

Board paper

Subject: ARB's approach to Safeguarding

Board meeting:

22 July 2026

Agenda item:

11

Action:

- For noting ☐
- For discussion ☐
- For decision ☒

Purpose

To agree ARB's approach to safeguarding.

Recommendations

The Board is asked to agree the proposed future approach to safeguarding as outlined in key points 2.20-2.20.2.

Annexes

N/A

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1. Open Session

2. Background and Key points

Context

- 2.1. One of the recommendations from the last externally facilitated Board and Committees Effectiveness Review in late 2023, advised ARB to develop provision for safeguarding. The National Council for Voluntary Organisations (NCVO), who undertook the Effectiveness Review, confirmed that protecting people and safeguarding responsibilities should be a governance priority for all organisations, and that this is a key part of operating as an organisation which exists to protect the public.
- 2.2. Noting that ARB's governance processes did not explicitly take safeguarding into account, the review outcomes suggested that safeguarding briefing sessions should be provided to Board Members in relation to their duties and responsibilities. It was also suggested that ARB should develop a safeguarding culture, including a policy. The Board was additionally advised to review risks associated with potential safeguarding matters.
- 2.3. After initial discussions in the first part of 2024, and given the nature of ARB's role and business, it was felt that this was a low-risk area and that it could be returned to later.
- 2.4. It is, however, an important area and further to the recommendations, the Executive with input from the People Committee, have been exploring whether it would be appropriate to develop a safeguarding policy and/or organise relevant briefing and development sessions.

Legislation Background

- 2.5. There are several pieces of legislation which deal with the area of safeguarding, including the Care Act 2014, the Children Act 1989 and Children Act 2004, as well as statutory guidance. Safeguarding is generally understood to refer to the protection of a person's right to live in safety, free from abuse and neglect. In the case of adults, this directly links to protecting people with care and support needs from abuse or neglect. The legislation places an emphasis on empowerment and supporting people to make their own decisions, wellbeing and dignity. Preventing harm as well as reacting to situations where harm is or has been experienced are vitally important.

- 2.6. Safeguarding includes indirect risks, including data handling and the misuse of personal information, online services, and contracting with third parties. All public bodies are expected to act in the public interest and protect rights and wellbeing. Failure to safeguard, even in a low-level way, can impact on the trust in an organisation, result in reputational harm and could in some circumstances lead to legal action.
- 2.7. Most public sector organisations therefore have formal safeguarding policies and supporting guidance for the people connected to them. As such this is seen as good practice. However, context is particularly crucial. Organisations, who have groups including board/committee members, associates, and stakeholders, who may have contact with children or vulnerable individuals will often have more detailed safeguarding frameworks and policies in place.
- 2.8. For ARB, and as set out in 2.6 above, safeguarding is linked to the organisation's obligations as an employer and as a regulatory body with responsibility for protecting the public. The organisation carries a responsibility for safeguarding, and individuals' responsibilities will vary by role.

Safeguarding levels of responsibility

- 2.9. The following table summarises the relevant levels of responsibility:

Level of Responsibility	Summary of Responsibilities
Board and Committee Members	Establishing and maintaining appropriate organisational culture Ensuring appropriate systems and processes are in place and that they are effective Monitoring risk and compliance with relevant the framework and policies Holding the Executive to account
Senior Leadership Group	Upholding and supporting the appropriate organisational culture Ensuring that appropriate systems and processes are in place and are being followed, including any vetting and contractual safeguards Monitoring risks and compliance Reporting issues to the Board

Level of Responsibility	Summary of Responsibilities
Staff	Supporting the appropriate organisational culture Following appropriate systems and processes Reporting concerns Engaging in mandatory briefing and development activities
Associates	Participate in any organisational vetting processes and adhere to contractual safeguards Undertake relevant briefing and development activities provided by the organisation.

2.10. We have also assessed the likelihood of where ARB's Board and Committee Members, Associates and/or staff may have potential contact with vulnerable individuals.

ARB Groups	Likelihood of contact with vulnerable individuals
ARB Board members	Low
ARB Committee members	Low
ARB Associates – Accreditation Visitors	Low, however they may have potential contact with vulnerable individuals when visiting education providers either in person or online.
ARB Associates – Prescribed Examiners/UK Adaptation Assessors	Low, however they may have potential contact with vulnerable individuals when examining or assessing candidates online.
ARB Associates – Professional Conduct Committee Members	Low, however they may have potential contact with vulnerable individuals when undertaking hearings, either in person or online.

ARB Groups	Likelihood of contact with vulnerable individuals
ARB Associates – Expert Advisers (International advisers, Chair’s Independent Annual Reviewer)	Low, the work they undertake is almost exclusively desk based, although there are occasional in person meetings.
ARB Associates – Investigations Panels	Low, however they may have potential contact with vulnerable individuals when undertaking hearings, either in person or online.
ARB Staff	Low, however they may have potential contact with vulnerable individuals when dealing with queries, visiting education providers, participating in external meetings and conferences.

2.11. We have considered how this might impact the profession, but have excluded registered architects from further consideration, noting that ARB’s Code of Conduct applies to them.

Benchmarking of other organisations

2.12. We have undertaken some benchmarking to understand whether ARB is an outlier, as well as show the approaches taken by other statutory regulatory bodies and similar organisations. This has helped us gauge what others are doing and identify what positive things we can learn and consider in taking a proportionate approach to this area.

2.13. The Solicitors Regulatory Authority (SRA) does not have a standalone safeguarding policy. It has embedded its approach to safeguarding within its regulatory framework through several of its existing policies and guidance. It requires solicitors to identify and respond to risks of harm through its Principles. As such, solicitors are required to act in a way that upholds public trust, act with integrity and honesty, act in their clients’ best interest and to promote equality, diversity and inclusion. This approach is reinforced through the SRA’s Code of Conduct. The SRA also provides specific guidance for solicitors on safeguarding.

2.14. Safeguarding is embedded within the SRA’s internal policies for its staff, Board and Committee members, and associates. Whilst the SRA does not have a single policy covering safeguarding, provision has been included within policies such as the dignity at work/bullying and harassment policy, whistleblowing procedures, inclusion and diversity policies, and health and wellbeing policies.

- 2.15. A similar approach has been taken in relation to the SRA's Board and Committee members, as well as associates who undertake work for the SRA. Relevant requirements are covered within Codes of Conduct, values and behaviours and appropriate processes have been put in place for investigation and dismissal where these may be required and relate to safeguarding issues.
- 2.16. The Financial Conduct Authority (FCA) embeds safeguarding within its consumer protection framework. For example, the FCA has guidance for firms on the fair treatment of vulnerable customers, and it requires firms to embed safeguarding within their operations. The FCA has a series of robust, more direct, and measurable requirements that it expects firms to comply with.
- 2.17. As with the SRA, the FCA has similar key internal policies and governance processes in place which relate to staff, Board and Committee members, as well as associates.

ARB's current approach

- 2.18. Noting the approaches taken, ARB already has the following in place:
- 2.18.1. Board, Committee and Associates Handbooks which include codes of conduct, policies covering complaints, details of ARB's approach to equality, diversity and inclusion and dignity in the workplace, ARB's whistleblowing policy, as well as ARB's Values and Behaviours.
 - 2.18.2. The current staff handbook covers our policies around bullying and harassment and dignity at work.
 - 2.18.3. Briefing and development through online modules cover the above to address and make clear responsibilities and expectations. All Board members, committee members, associates and staff undertake mandatory training in these areas.
- 2.19. It is important to note that the handbook documents and policies do not refer explicitly to safeguarding but are implicit in their nature and they do cover the principles and approaches that must be adopted.

ARB's proposed future approach

- 2.20. Noting that ARB exists to protect the public, and that safeguarding should be a key feature of the organisation's governance, we propose to take the following actions forward to equip those who work for ARB with the appropriate knowledge should they encounter any safeguarding issues:

- 2.20.1. The Governance and HR Teams will update documents such as the Board Handbook, Associates Handbook and/or relevant policies during our established review cycle period. We do not see the need to bring this work forward due to the low-risk nature identified. This will include more specific references to safeguarding which will be appropriate and proportionate.
- 2.20.2. Similarly, as we undergo the review of our staff handbook and/or relevant policies the HR team will consider the inclusion of more specific references to safeguarding. The HR team will also look at our briefing and training material at the same time.
- 2.21. The People Committee discussed ARB's approach to safeguarding at its meeting on 28 April 2026, and after considering different potential scenarios, agreed that there was no need for ARB to develop a separate policy. The Committee therefore supported the proposed future approach as outlined in key points 2.20-2.20.2 above.
- 2.22. The Board is asked to consider the details within the paper and agree the proposed future approach as outlined in key points 2.20-2.20.2.

3. Resource Implications

- 3.1. Regular reviews of our internal policies form part of our core work, although if and when expert advice is required this is likely to have cost implications. These will need to be borne in mind, should any external advice be required. There is contingency within budgets to cover one off costs such as this.
- 3.2. If it is determined that further briefing and development via online modules is appropriate, this too will have a cost implication. If the costs cannot be covered from within our 2026 budget, we may need to consider this when we collate our 2027 budgets.

4. Risk Implications

- 4.1. Safeguarding has been flagged as an important area through the last externally facilitated Board and Committee Effectiveness Review, and as a result, it is important that we explore the development of a proportionate approach to this area based on good practice.

4.2. In order to fulfil our role in protecting the public, supporting the profession, and ensuring that those who work for and come into contact with ARB are appropriately supported, it is important that we explore this area and ensure we put appropriate measures in place to mitigate any potential risks.

4.3. We have looked at the likelihood of a number of groups coming into contact with vulnerable individuals within this paper. This has identified that there are no significant risks and that the impact is low. Should situations arise where some ARB's associates and staff come into contact with vulnerable individuals, our current approaches enable them to respond and conduct themselves in a respectful and professional manner. Our approach to further inform and integrate safeguarding into our work have been set out above.

5. Equality and Diversity implications

5.1. Equality, diversity and inclusion matters have been considered in putting this paper together. See key points above.

6. Recommendations

6.1. The Board is asked to agree the proposed future approach to safeguarding as outlined in key points 2.20-2.20.2.