

SAFEGUARDING POLICY

Contents

• <u>Policy Statement</u>	2
• <u>Purpose of Policy</u>	2
• <u>Scope of Policy</u>	2
• <u>Roles and responsibilities</u>	3
• <u>Recruitment, selection and employment procedures</u>	6
• <u>Safeguarding disclosure principles</u>	6
 <u>Part One - Safeguarding of Children</u>	 8
1. <u>Definition</u>	8
2. <u>Legislation and statutory guidance</u>	9
3. <u>Equality statement</u>	9
4. <u>Confidentiality</u>	10
5. <u>Recognising abuse and taking action</u>	11
6. <u>Online safety and use of mobile technology</u>	15
7. <u>Students with a social worker</u>	17
8. <u>Record-keeping</u>	17
9. <u>Visitors</u>	18
 <u>Part Two - Safeguarding Adults</u>	 19
1. <u>Definition</u>	19
2. <u>Disclosures</u>	20
3. <u>Confidentiality and information sharing</u>	21
4. <u>Making a referral or getting advice.</u>	22
 <u>Part Three - Prevent</u>	 24
1. <u>Introduction</u>	24
2. <u>The Duty</u>	25
3. <u>Vocabulary of Prevent</u>	26
4. <u>Threat and Risk</u>	28
5. <u>University Prevent actions</u>	28
6. <u>Channel</u>	29
7. <u>Ofsted</u>	32
8. <u>Counter Terrorism Local Profile (CTLP)</u>	33
9. <u>Prevent Toolkits and Support</u>	34
 Appendices	
A <u>Safeguarding Procedures Flowchart</u>	31
B <u>Sharing of nudes and semi-nudes ('sexting') Procedure</u>	32
C <u>Internal Safeguarding Contacts</u>	35
D <u>External Safeguarding Contacts</u>	36
E <u>Safeguarding Definitions</u>	39
F <u>Safeguarding for Saturday Clubs and under 16's</u>	48
G <u>Reporting and Dealing with Allegations of Abuse Against Members of Staff</u>	49
H <u>Supplementary Guidance on Particular Safeguarding Issues</u>	54
I <u>Key Legislation</u>	56

Policy Statement

Arts University Plymouth (AUP) is committed to providing a safe and supportive learning environment and valuing, promoting and safeguarding the welfare, health and safety of all our students.

Safeguarding and Duty of Care is the responsibility of all staff

The policy is in three parts, encompassing both **safeguarding of children, vulnerable adults and the Prevent Duty**.

This policy outlines Arts University Plymouth's approach to the safeguarding and protection of our students in relation to the statutory requirement and legal framework. This policy is informed by the relevant guidance from central government, legislation, and the [Plymouth Safeguarding Children Board](#) (PlymouthSCB).

Purpose of the Policy

The purpose of this policy is to ensure that Arts University Plymouth:

- safeguards children (those under the age of 18) and vulnerable adults and protects them from significant harm, abuse, maltreatment and inappropriate behaviour.
- discharges its Duty of Care to all its students.
 - AUP recognises we have a general duty of care to deliver educational and pastoral services to the standard of an 'ordinarily competent institution' and in carrying out these services, act reasonably to protect the health, safety and welfare of their students.
 - The duty owed is not a duty to ensure that no harm will ever occur, but a duty to take reasonable care to avoid harm being suffered.
- supports students in their transition to maturity and independence as an adult.
- identifies proactively those students who are suffering or likely to suffer significant harm and takes appropriate and timely action.
- follows the processes and procedures for reporting safeguarding and protection concerns and takes an active role in multi-agency working.
- follows and works in accordance with the [Plymouth Safeguarding Children Board](#) and Statutory guidelines.

In addition to this the University commits to providing a supportive and stimulating environment through health and wellbeing promotions, drug and alcohol awareness, radicalisation and e-safety awareness, preventing harassment and sexual misconduct and through responding to emergent needs from the student body and the wider community.

Scope of the Policy

This policy and associated processes cover safeguarding in the digital environment as well as the physical environment (with detailed information on both at Appendix E) and applies to all University staff, students and volunteers whether permanent or temporary and includes any agency or visiting staff (such as visiting artists / lecturers) who encounter the following groups through teaching, research, professional services and outreach activities:

- **children**
 - defined as those aged under 18
- **vulnerable adults**
 - defined as a person aged 18 or over, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

The terms “must” and “should” are used throughout the guidance. The term “must” is used when the person in question is legally required to do something and “should” when the advice set out should be followed unless there is good reason not to.

Occasionally external links are changed or cease to exist. If a link is not working please contact the [policy holder](#).

Roles and responsibilities

All Staff must:

- if working with children, read and understand **at least** Part 1 and Annex B of the Department of Education's statutory safeguarding guidance, the latest version of [Keeping Children Safe in Education](#) (updated September each year)
- sign a declaration at the beginning of each academic year to confirm they have reviewed the guidance
- be aware of our systems which support safeguarding, including this child protection and safeguarding policy, the [Code of Conduct for Employees](#), the role and identity of the designated safeguarding lead (DSL) and Deputy Designated Safeguarding Leads
- comply with this policy and subsequent safeguarding procedures
- successfully complete initial Safeguarding and Prevent induction training and thereafter complete refresher training every two years.
- be responsible for providing a safe environment
- be responsible for recognising and responding to students who are at risk, require additional support and who are, or could be, suffering harm/abuse
- support and actively engage in multi-agency working when making decisions about the welfare of a child or vulnerable adult
- be aware of new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.

The Vice-Chancellor will:

- designate overall responsibility for child protection and safeguarding activities including the appointment of a Designated Safeguarding Lead (DSL) who is a member of the Vice Chancellor's Executive (VCE) and has undertaken training in inter-agency working in addition to basic Child Protection training (provided by the Plymouth Safeguarding Board or other designated training provider)
- complete initial Safeguarding / Prevent training and refresher training every 2 years to keep up to date on child protection and safeguarding responsibilities and the University's procedures and policies

- allocate sufficient time, training, support and resources, including cover arrangements when necessary, to enable the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) to carry out their roles effectively, including the assessment of students and attendance at statutory discussions and other necessary meetings
- liaise with the DSL/DDSLs and the Head of HR when an allegation is made against a member of staff.

The Governing Body will:

- receive an annual report which reviews how the duties have been discharged undertake Safeguarding and Prevent training on appointment and thereafter every three years
- ensure that a DSL has been appointed, that the responsibility is detailed in the role holder's job description, the appropriate high-level training is completed and that refresher training is undertaken every two years thereafter
- ensure the University has procedures in place for dealing with allegations made against a member of staff including the Vice-Chancellor and allegations against other students
- ensure the University follows safer recruitment procedures that include statutory checks on staff suitability to work with children, young people and vulnerable adults
- ensure the University maintains and reviews its training strategy and safeguarding policy in accordance with the [Plymouth Safeguarding Children Board](#).
- ensure the University supports staff involved in safeguarding procedures
- Read the latest version of [Keeping Children Safe in Education](#) or at least Part one
- ensure that those staff who work directly with children (U18) and vulnerable adults read at least Part one of Keeping Children Safe in Education and others should either read Part 1 or the condensed version of Part one (Annex A to KCSIE - a condensed version of Part one).

The Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for child protection and wider safeguarding at AUP, including online safety. When the DSL is absent, the DDSLs will act as cover. The DSL will be given time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters
- undertake child protection and safeguarding training at least every 2 years.
- update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, or taking time to read and digest safeguarding developments).
- undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- ensure that AUP DDSLs refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly where appropriate.
- have a good understanding of harmful sexual behaviour.

The DSL will also:

- provide advice to the Vice-Chancellor, Vice-Chancellor's Executive and governing body on safeguarding issues, including resourcing requirements
- provide assurances to the governing body on safeguarding standards being met and that staff involved in safeguarding are sufficiently supported.
- chair termly Safeguarding Committee
- ensure relevant university policies and procedures are relevant, reviewed and meet the statutory requirements
- oversee the production of an annual report on safeguarding to the Board of Governors.
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

Deputy Designated Safeguarding Leads (DDSL) for Prevent, Higher Education and Pre Degree

The DDSLs must be trained to the same standard as the DSL and can be delegated to carry out the activities of the DSL. Whilst each DDSL will oversee their assigned area, all DDSLs will be able to respond to any form of safeguarding matter if any are absent.

The DDSLs will:

- undertake child protection and safeguarding training at least every 2 years.
- update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, or taking time to read and digest safeguarding developments).
- they, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.
- they, or any other designated Prevent lead will attend the relevant partnership meetings/conferences
- fulfill the duties and responsibilities as delegated by the DSL
- provide reports to the relevant internal and external stakeholders as outlined in job descriptions
- oversee the maintenance of appropriate and accurate record keeping.
- maintain an accurate and up to date list of external contacts and their referral processes.
- liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the University's policies.
- attend Child Protection Conferences (CPCs) where applicable for DDSL role.
- contribute to the assessment of children or vulnerable adults.
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- refer adult safeguarding cases to the local authority where appropriate.
- provide advice/guidance and training for AUP staff

- ensure a joined-up approach to safeguarding, working with the DSL and other DDSLs where applicable, ensuring the timely and relevant sharing of information - right time, right place, right people.

Senior Safeguarding Officers for Higher Education and Pre Degree (Lead Counsellor and Learning Support Coordinator)

- provide cover in the events the DDSL for HE and Pre Degree are absent.
- maintain accurate records for referrals and student case files
- attend training in Child Protection and Multi-Agency Working as required with [Plymouth Safeguarding Children Board](#) every 2 years
- make referrals and contact with external agencies as appropriate in collaboration with the student where possible
- share information with families with the best interests and wishes of the student in mind and in collaboration with the student

Recruitment, selection and employment procedures

The University will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children, young people and adults in a vulnerable situation.

Where a risk assessment has identified that students or staff are likely to have regular contact with or encounter children, young people or adults in a vulnerable situation, appropriate checks into their eligibility will be required. Such processes will be compliant with the University's [Equality, Diversity & Inclusion Policy](#).

The University is registered with the [Disclosure and Barring Service](#) ("DBS") and will ensure that any member of staff or any student who will have substantial one-to-one contact with children, young people or adults in a vulnerable situation and their role falls within the eligibility criteria will be checked for relevant criminal convictions. The DBS does not charge for checks on volunteers.

Safeguarding Disclosures Principles

The procedures in the event of a disclosure will look different depending on whether the concern is for an adult or child - however Appendix A is suitable for both adult and child concerns. The following general principles apply:

- The University is an agent of referral and not of investigation, other than when this pertains to ensuring we are fulfilling our duty of care. It is not necessarily the University's responsibility to investigate abuse/significant harm. **Staff should not extend an offer of confidentiality** but should clearly inform the person that when information about abuse/significant harm is disclosed there is a duty on all staff to follow reporting procedures.
- **Staff and students may not always recognise what is happening as abuse -**

Sometimes disclosures are made because someone has taken the time to recognise and ask the question. You are not in a position to assess how serious a concern is - if you do not report it is likely to become more serious.

- Where possible, apply a “nothing about me, without me” person centred approach to safeguarding - the person who needs safeguarding should be involved in the decisions and actions that are taken (where this is possible and doesn’t add risk), with their feelings, wishes and beliefs considered.
- Apply the child and adult principles when deciding which approach to take.

Part One - Safeguarding of Children

1. Definitions

1.1 **Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

1.2 **Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

1.3 **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix E explains the different types of abuse.

1.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix E defines neglect in more detail.

The following three **safeguarding partners** are identified in the September 2025 [Keeping Children Safe in Education](#) (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

1.5 **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

1.6 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

2. Legislation and Statutory Guidances

2.1 [Section 175 of the Education Act 2002](#) requires institutions delivering Further Education (FE) to exercise their functions with a view to safeguarding and promoting the welfare of children under 18 years of age. [Section 10 of the Children Act 2004](#) outlines the duty on institutions delivering FE to cooperate with the Local Authority and other agencies.

2.2 [Working Together to Safeguard Children 2018](#) (updated December 2020) outlines the role institutions have in the early identification of concerns and to take an active role in liaising with social care, the police, health services and other services to protect and promote the welfare of children under 18 years of age. Safeguarding and protecting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

2.3 Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

2.4 [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

3. Equality statement

3.1 Some children and young people have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

3.2 We give special consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language (EAL)
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation

- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing or absent from education for prolonged periods and/or repeat occasions.

4 Confidentiality

4.1 AUP recognise that, timely information sharing is essential to effective safeguarding and when exploring whether to share information, staff will consider the laws and apply the following principles:

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a student asks the university not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if they don't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL or DDSL

5. Recognising abuse and taking action:

5.1 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- is disabled
- has special educational needs (whether or not they have a statutory education health and care plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from education, care or home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol
- is suffering from mental ill health
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- is a privately fostered child
- has a parent or carer in custody or is affected by parental offending
- is missing education, or persistently absent from school/college, or not in receipt of full-time education
- as experienced multiple suspensions and is at risk of, or has been permanently excluded

5.2 Staff who are concerned about actual or potential abuse or harm, should follow the safeguarding reporting flowchart (Appendix A).

5.3 **If a child is suffering or likely to suffer harm, or is in immediate danger**, staff must follow the Safeguarding referral pathway in Appendix A.

5.4 In the event that there is no DSL/DDSL onsite or the safeguarding concern comes outside of normal hours, you can make a referral to local authority children's social care

and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

5.5 Tell the DSL/DDSL as soon as possible if you make a referral directly.

5.6 For more information on reporting abuse, you can visit the [local council reporting site](#) or there is more information in Appendix D.

- **What to do in the event of a disclosure**

5.7 If a child discloses a safeguarding issue to you, you should:

- Listen to and take them seriously. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Follow the safeguarding reporting safeguarding concerns flowchart Appendix A, making sure to tell the right people, at the right time, in the right way - follow up by completing formal details in an email or using the [AUP Safeguarding Referral form](#) and sending by email. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- **Do not let the absence of a designated lead prevent you from following the safeguarding procedures** particularly if immediate action needs to be taken. Staff should consider speaking to a member of the VCE and/or take advice from the social services or police.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

- **If you discover that FGM has taken place or a student is at risk of FGM**

5.8 [Keeping Children Safe in Education](#) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

5.9 Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix E of this policy.

5.10 **Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

5.11 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

5.12 The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. **Staff should not examine students.** **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a student **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures Appendix A

- **If you have concerns about a child (as opposed to believing a child is suffering from harm, or is in immediate danger).**

5.13 Where possible, speak to the Pre Degree DDSL or wider Safeguarding Team first to agree a course of action. If in exceptional circumstances the safeguarding team is not available, this should not delay appropriate action being taken. Speak to a member of VCE and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible, following up with written details.

- **Early Help Assessment**

5.14 If an early assessment help is appropriate, the Pre Degree DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

5.15 We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

5.16 The Pre Degree DDSL will keep the case under constant review and the University will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

- **Referral**

5.17 If it is appropriate to refer the case to local authority children's social care or the police, the Pre Degree DDSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible.

5.18 The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The Pre Degree DDSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

5.19 If the child's situation does not seem to be improving after the referral, the Pre Degree DDSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

- **If you have a concern about mental health**

5.20 Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

5.21 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Appendix A. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Pre Degree DDSL to agree on a course of action.

- **Allegations of abuse made against other students.**

5.23 We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

5.24 We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

5.25 Most cases of students hurting other students will be dealt with under our University's Code of Conduct and Disciplinary Procedures, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put fellow students at risk
- Is violent

- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix E for more information about child-on-child abuse.

- **Procedures for dealing with allegations of child-on-child abuse**

5.26 If an AUP student makes an allegation of abuse against another AUP student:

- You must record the allegation and tell the DSL/Pre Degree DSL, but do not investigate it
- The DDSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DDSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DDSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DDSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

- **Sharing of nudes and semi-nudes**

5.27 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately, it is **vitaly important** you follow the procedure in **Appendix B**.

6. Online Safety and the use of mobile technology

6.1 We recognise the importance of safeguarding children and vulnerable adults from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

6.2 To address this, AUP aims to:

- Have robust processes in place (including filtering and monitoring) to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole university community in its safe and responsible use of technology, including mobile and smart technology
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

- **The 4 key categories of risk**

6.3 Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

6.4 **To meet our aims and address the risks above, we will:**

- Educate students about online safety as part of our wellbeing support. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalization, and their expectations, roles and responsibilities around filtering and monitoring.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet.
- Put in place robust filtering and monitoring systems to limit exposure to the 4 key categories of risk (described above) from AUP's IT systems.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

- **Artificial Intelligence (AI)**

6.5 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

6.6 AUP recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students.

6.7 However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

6.8 AUP will treat any use of AI to access harmful content or bully students in line with this policy and our Conduct policy.

6.9 Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by AUP.

7. Students with a social worker

7.1 Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

7.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a student has a social worker, the DDSL/DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- responding to unauthorised absence or missing education where there are known safeguarding risks
- the provision of pastoral and/or academic support.

8. Record-Keeping

8.1 All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. Where staff have shared concerns with the DSL/DDSLs, this should always be followed up in writing, as per the reporting concern flowchart (Appendix A).

8.2 Record-keeping should also include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

8.3 Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

8.4 Concerns and referrals will be kept in a separate child protection file for each child.

8.5 Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

8.6 If a child for whom AUP has, or has had, safeguarding concerns moves to another educational institution, the DDSL for Pre Degree will ensure that their child protection file is forwarded promptly and securely.

8.7 This will be done to allow the new college to have support in place when the child arrives.

8.8 In addition, if the concerns are significant or complex, and/or social services are involved, the DDSL will speak to the DSL of the receiving college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

9. Visitors

9.1 Any visitors including external speakers or visiting lecturers should be escorted and accompanied by a staff member at all times. It is University policy not to leave a visitor unattended and this includes both external visitors on campus and when conducting a session online. This is the case even if the visitor has appropriate DBS clearance and / or safeguarding training. This is no reflection on the external visitor but helps to ensure professional safety for all involved.

9.2 When external visitors are running sessions with Pre Degree learners they should be made aware of this policy. The staff member responsible for the external visitor must ensure they are appropriately prepared for the session and have been offered support by the University so that they are able to join or facilitate the online session safely.

9.3 The [Academic Freedom & Freedom of Speech Policy](#) should also be considered when external visitors are invited to address students from both Pre Degree and Higher Education.

Part Two - Safeguarding of Adults

1. Definitions

The term safeguarding can be interpreted in different ways, this policy recognises that adopting an agreed language and understanding will enable a consistent response and appropriate action.

1.1 **Safeguarding with a capital 'S'** is a formal response to safeguarding resulting in a referral (or enquiry) under s42 of the Care Act to the Local Authority. In order to meet the threshold for an enquiry, it has to meet three criteria:

1. An adult who has **care and support needs** (whether or not the LA is meeting those needs),
2. and is experiencing, or at **risk of abuse and neglect**
3. and as a result of those care and support needs is unable to protect themselves from abuse and neglect or the risk of it"

1.2 **Safeguarding with a little 's'** many adults with mental health problems who have care and support needs can be vulnerable due to the complexities of their situation. They may need a coordinated approach to support, from services such as the NHS or social care to mitigate the risks within their daily life. The difference is that they are not necessarily experiencing abuse or neglect, so will not meet the formal threshold for an enquiry under the Care Act.

1.3 Whilst AUP is not subject to the legal provisions within the Care Act 2014, this policy and associated procedures draws on the formal definition of safeguarding (capital S), although with the caveat that you can have an adult who could have both small 's' and capital 'S' needs. Small 's' safeguarding responses are managed through the 'Health, Wellbeing and Support to Study' policy and procedures - and the "[Higher Education Mental Health and Wellbeing - Information and Procedures for staff](#)" (for internal staff only).

1.4 **What is abuse and neglect/self-neglect:** this is outlined in Appendix E of this policy.

1.5 **What are some of the reasons students may be unable to protect themselves?** Lacking the executive functions (autism/adhd), skills, means or opportunity to self-protect; lacking capacity to make decisions (through a disability; substance misuse or mental health issue); living in a group environment and unable to control their treatment (power imbalance); domestic situation lacking resources to leave or by coercion; lack of resilience or resourcefulness to protect themselves.

1.6 **Who might require "care and support" (not exhaustive):**

A person with a physical disability, a learning difficulty or a sensory impairment; someone with mental health needs, including a personality disorder; a person with a long-term condition; someone misusing substances or alcohol; care experienced; young carers; those living in temporary accommodation.

1.7 **What are the types of 'Care and Support':**

These are types of support provided in response the above vulnerabilities (not exhaustive):

Accommodation; financial; psychotherapy; other healthcare; physical support (dressing, hygiene, eating and drinking); maintaining human connections.

1.8 The Six safeguarding principles (embedded in the Care Act):

1. **Empowerment:** people being supported and encouraged to make their own decisions
2. **Prevention:** It is better to take action before harm occurs
3. **Proportionality:** The least intrusive response appropriate to the risk presented.
4. **Protection:** Support and representation for those in greatest need.
5. **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. **Accountability** - Accountability and transparency in safeguarding practice.

2. Disclosures

2.1 Adult safeguarding disclosures happen when:

- a. The adult communicates that they have been (or are worried they may be) abused or neglected; or
- b. Any other person reveals that they have seen an incident of abuse or neglect, or found evidence that indicates it may be, or is occurring.

2.2 Follow the safeguarding referral pathway flowchart (Appendix A), making sure to tell the right people, at the right time, in the right way - follow up by completing a formal report, [AUP Safeguarding Referral form](#) and sending by email.

2.3 Any member of AUP, including the vulnerable adult can make a safeguarding referral - please see paragraph 4.

2.4 Following a disclosure, or whenever concerns are present, there should always be an immediate evaluation of risk to identify any urgent steps required to ensure the adult is in no pressing danger.

2.5 Unless there is a risk to life, the adult lacks capacity to make decisions of this nature, or there is a risk to others, any immediate actions should take place in line with the views and wishes of the adult about how best to protect them from harm.

2.6 Examples of immediate action might include:

- a. Calling 999 if a crime is in progress;
- b. Calling 999 in a medical emergency;
- c. Calling NHS 111 for medical advice;
- d. Calling 101 for Police (where this is non-urgent)
- e. Advising them of how to contact their GP or other health professional;
- f. Supporting the adult to get home safely;
- g. Arranging for someone to be with the adult so they are not alone;
- h. Steps to manage the risk to others.

2.7 If immediate action is required, do not let the absence of a designated safeguarding lead delay appropriate action. Staff should consider speaking to a member of VCE and/or take advice from NHS 11 or Police 101. In these circumstances, actions can then be shared with the relevant staff - see Appendix A

2.8 A disclosure may be related to a current or past event, and can be very traumatic for the adult. It may have taken a long time for them to decide whether to tell someone - they may feel they won't be believed, nothing will happen, or that their safety could be at risk. Do:

- Take the disclosure seriously;
- Accept what they are saying;
- Listen carefully and don't interrupt them;
- Try to remember the words used by the adult, and anything they want to happen next;
- Stay calm and avoid reactions such as shock, disbelief or anger;
- Ask questions to establish basic facts;
- Establish if the adult feels safe now, to identify if immediate action may be required;
- Establish any emotional support they may need after you leave;
- Talk about the safeguarding adults process, what it means and **seek consent to make a referral**, you may want to offer help them submit a referral themselves;
- Explain what will happen next and when they can expect to hear from someone;
- Reassure them that they will be involved in any decisions;
- When talking about what will happen next, think about any specific communication needs they may have and how to make sure information is accessible.

2.9 If someone, usually a student / member of staff, puts forward an event of significant concern that they have witnessed it is imperative a statement is obtained from that person (it needs to be written by the witness/es).

3. Confidentiality and Information Sharing

3.1 Adults have a general right to independence, choice and self-determination including control over information about themselves; wherever possible AUP will seek to gain consent over the sharing of information.

The six safeguarding principles should underpin all safeguarding practice, including information-sharing.

3.2 Sharing of information within the University, with families and with external agencies will be considered on an individual case by case basis and the wishes and needs of the individual will be taken into consideration where at all possible.

3.3 The following exceptions apply to sharing information with consent:

- **Sharing information with external parties**

1. Where it is believed to be in the vital interests (life or death situation) of the adult (or those the adult may have caring responsibilities to)
2. The adult is being subjected to inhuman or degrading treatment which is having a serious impact on their wellbeing;
3. Other adults or children are at risk of being abused;
4. There are concerns that a decision has not been made freely but been unduly influenced or subject to coercive control.

- **Sharing information with relevant AUP staff**

3.4 Where it is deemed in the best interest of the student and/or wider public interest, information may be shared internally, within the parameters of the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). Reporting of concerns should be carried out in line with internal processes (Appendix A) whilst always attempting to gain the consent of the adult concerned. Always pass on concerns in person or by telephone and follow by submitting [AUP Safeguarding Referral form](#) and sending by email.

3.5 As long as it does not increase risk, staff should inform the person if they need to share their information without consent.

3.6 Where an adult has declined safeguarding support, and the above criteria are not met, AUP recognise that decisions should be made regarding any reasonable mitigation of risk, taking into account the impact of the abuse or neglect on the person's wellbeing and the impact on others.

3.7 Due to the confidential nature of safeguarding, the student support team will only contact you again if it is directly relevant to the concern. The University's discipline and harassment and sexual misconduct policies can also be referred to.

3.8 Student Support case files will be kept in an appropriate format and will be limited for viewing on a strict 'need-to-know' basis, usually only by Safeguarding Officers. When feeding back to meetings and the Safeguarding Committee, data, including names and courses will be anonymised using only information such as 'a 3rd year undergraduate student'.

4. Making a referral or seeking advice.

4.1 If you are unable to, or do not want to make contact with a safeguarding lead, Plymouth Adult Social Care and Safeguarding can be contacted on **01752 668000** if you are not sure whether your concern meets the safeguarding definition/criteria as set out in the Care Act.

If you are independently making a safeguarding referral as a vulnerable adult or as a member of staff, you can do so via the "[Report adult abuse, neglect or a safeguarding concern](#)" referral site.

It is your right to contest any safeguarding decisions; full comprehensive information can be found at [‘Understanding what constitutes as a safeguarding concern’](#).

Part Three - Prevent

1 Introduction

1.1 [CONTEST](#) (**C**ounter-**T**errorism **S**trategy) is the overarching strategy to reduce the risk to the UK and its interests overseas from terrorism.

1.2 It has four strands:

- pursue: stopping terrorist attacks
- protect: strengthening protection against terrorist attacks
- prepare: where an attack cannot be stopped, mitigating its impact
- prevent: stopping people becoming terrorists or supporting violent extremism

1.3 **Prevent** is one part of the United Kingdom's counter terrorism strategy ([CONTEST](#)¹) and aims to:

stop people from becoming terrorists or supporting terrorism

1.4 Prevent has three objectives in CONTEST:

- tackle the causes of radicalisation and respond to the ideological challenge of terrorism
- safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
- enable those who have already engaged in terrorism to disengage and rehabilitate

1.5 There was an [Independent Review of Prevent](#) with the findings published in February 2023 with 34 recommendations. These have been processed through appropriate channels (Counter Terror Police Southwest).

1.6 A [Prevent Learning Review](#), jointly-commissioned by Counter Terrorism Policing and the Home Office was produced after the Southport attack in July 2024, and was published on 5 February 2025). Head of Counter Terror Policing, Matt Jukes, made a statement that included:

“Around the world, we are seeing growing numbers of young people drawn not only to terrorism but also into extreme violence online of all forms, including those with an interest in mass casualty attacks and contending with mental health and social challenges. As others have recognised, as well as ensuring Prevent plays its part, new interventions for young people fixated on violence rather than terrorist ideology are needed, and their cases should have a clear home. They should not be passed from organisation to organisation”.

2 The Duty

2.1 The [current threat](#) from terrorism and extremism in the United Kingdom is set by the Joint Terrorism Analysis Centre and the Security Service (MI5). The threat level indicates

¹ CONTEST is currently being reviewed by the government.

the likelihood of a terrorist attack in the UK. The levels are as follows and can change at any time:

- low - an attack is highly unlikely
- moderate - an attack is possible but not likely
- substantial - an attack is likely
- severe - an attack is highly likely
- critical - an attack is highly likely in the near future

2.2 The threat can involve the exploitation of vulnerable people, including children, to involve them in extremist activity. [Section 26](#) of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies (“specified authorities” listed in [Schedule 6 to the Act](#)), in the exercise of their functions, to have

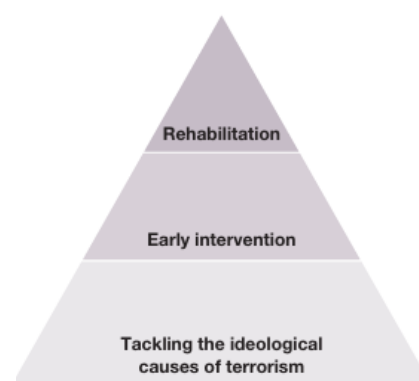
“due regard to the need to **prevent** people from being drawn into terrorism.”²

Educational institutions including both Further Education and Higher Education are included and Prevent is therefore included within this Safeguarding Policy.

2.3 Prevent utilises a multi-agency approach, similar to the one that has already been proved to be successful in dealing with other safeguarding issues such as [Child Sexual Exploitation \(CSE\)](#). It is local authority led (Plymouth City Council for AUP) and the multi-agency approach allows Prevent to achieve its purpose of safeguarding vulnerable individuals who are at risk of radicalisation.

2.4 The overall Prevent strategy is to respond to the ideological challenge of terrorism and the threat we face from those who promote it and to ‘prevent’ people from being drawn into terrorism and ensure that they are given appropriate advice and support. The Police work with sectors and institutions where there are risks of radicalisation that need to be addressed.

2.5 Prevent **does not** aim to criminalise people for holding extreme views; it operates in the ‘pre-criminal space’. Instead it aims to stop the encouragement or commission of violent activity. Therefore, reporting concerns **will not** automatically cause the person to have a criminal record. Prevent is not an alternative to the criminal justice system. Only if an actual crime has been committed then normal criminal justice procedures will apply.



2.6 In summary, Prevent aims to bring together local authorities, statutory partners (such as the education and health sectors, social services, children’s and youth services and offender management services), the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and

² [Prevent Duty Guidance](#).

extent of that risk and to develop the most appropriate support plan for those individuals concerned.

3 Vocabulary of Prevent

3.1 There are many terms that are associated with the topic of terrorism and it is important that for the purposes of promoting understanding of the aims of Prevent, that they are clearly explained (reviewed in accordance with the [Prevent Glossary of Terms](#) and [Revised Prevent duty Guidance](#) of March 2024):

- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance. that aims to:
 1. negate or destroy the fundamental rights and freedom³ of others; or
 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights⁴; or
 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
 - Extremism is typically judged on a pattern of behaviour to be the exhibiting of 3 or more instances of extreme behaviour that align to one or more extremist aims in the space of 6 months, but this yardstick must be flexible and considered proportionally and contextually in line with the evidence.
- **Extreme Right-Wing Terrorism** describes those involved in Extreme Right-Wing activity who use violence in furtherance of their ideology. These ideologies can be broadly characterised as Cultural Nationalism, White Nationalism and White Supremacism. Individuals and groups may subscribe to ideological tenets and ideas from more than one category.
- **Ideology** is a set of social, political, or religious ideas, beliefs, and attitudes that contribute to a person's worldview.
- **Interventions** are tailored packages intended to divert people away from extremist activity at the earliest opportunity and support their disengagement with terrorist ideologies where they have been involved in terrorism or terrorist-related activity.
- **Intolerance** as a phrase is found consistently in the jurisprudence of the European Court of Human Rights; see for example *Perinçek v Switzerland* (App. 27510/08). "Intolerance" in the context of the definition is closely linked with "violence" and "hatred" and is intended to mean (and is to be applied to mean) an actively repressive approach rather than simply a strong opposition or dislike.
- **Islamist Terrorism** is the threat or use of violence as a means to establish a strict interpretation of an Islamic society. For some this is a political ideology which envisions, for example, the creation of a global Islamic caliphate based on strict implementation of shari'ah law. Many adherents believe that violence (or jihad as they conceive it) is not only a necessary strategic tool to achieve their aims, but an individual's religious duty. In the UK the Islamist terrorist threat comes overwhelmingly from those inspired by, but not necessarily affiliated with, Daesh (ISIS / ISIL / Islamic State) and/or al-Qa'ida, but they operate within a wider

³ In particular those rights and freedoms listed in Schedule 1 to the Human Rights Act 1998. Lawful expression of one's beliefs, for example advocating for changes to the law by Parliament, exercising the right to protest, or expressing oneself in art, literature, and comedy, is not extremism

⁴ Including the right to vote, the right to join a political party, or the right to stand in elections

landscape of radicalising influences as set out in the government's response to the Independent Review of Prevent. Islamist should not be interpreted as a reference to individuals who follow the religion of Islam.

- **Left Wing, Anarchist and Single-Issue Terrorism (LASIT)** encompasses a wide range of ideologies. It includes those from the extreme political left-wing as well as anarchists who seek to use violence to advance their cause in seeking to overthrow the State in all its forms.
- **Online radicalisation** describes situations where the internet is believed to have played a role in a person's radicalisation pathway. The internet can play two broad roles in radicalisation (offering mechanisms often unavailable to people offline). These are: exposure to extremist and terrorist content and socialisation within 'likeminded' networks. Often this is facilitated by highly permissive environments online.
- **Permissive environments** may be characterised as being tolerant of behaviour or practices strongly disapproved of by others, such as an environment where radicalising ideologies are permitted to flourish. Radicalisers create and take advantage of permissive environments to promote or condone violence and to spread harmful ideologies that undermine our values and society. Permissive environments can exist both online and offline. Permissive online environments can contribute to online radicalisation.
- **Prevention** In the context of this document means reducing or eliminating the risk of people being radicalised or becoming involved in terrorism.
- **Radicalisation** is a personal and individual process, which will look different from person to person. When talking about the 'risk of radicalisation', it is therefore challenging to describe exactly what it looks like. Various signs or indicators may signal a person is at risk of being radicalised into terrorism. The Home Office's Prevent page on GOV.UK sets out in further detail how to spot the signs of radicalisation.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in the context of Prevent) from being drawn into terrorist related activity.
- **Susceptibility** is complex and unique to a person's circumstances. Within Prevent, susceptibility refers to the fact that a person may be likely or liable to be influenced or harmed by terrorist and extremist ideologies that support or radicalise people into terrorism (see the 'susceptibility to radicalisation' section of the Prevent duty guidance 2023). As set out in the Prevent duty guidance, a person's susceptibility may be linked to their vulnerability (see vulnerability below), but not all people susceptible to radicalisation will be vulnerable. There may be other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.
- **Terrorism** The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as 'The use or threat of serious violence against a person or serious damage to property where that action is:
 - designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; and
 - for the purpose of advancing a political, religious, racial or ideological cause.'
- **Terrorist 'ideology'** is a set of beliefs, principles, and objectives to which an individual or group purports to adhere and attempts to instil in others to radicalise

them towards becoming terrorists or supporting terrorism. There are several concepts or 'tools' that often feature in terrorist and extremist ideologies, including: narrative, propaganda, grievances, and conspiracy theory.

- **Terrorist-related offences** are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
- **Vulnerability** describes the condition of being in need of special care, support, or protection because of age, disability, risk of abuse or neglect.

4. Threat and Risk

4.1 Prevent deals with all kinds of terrorist threats to the UK. Prevent's first objective is to tackle the ideological causes of terrorism. The ideological component of terrorism is what sets it apart from other acts of serious violence. **Islamist ideology** is resilient and enduring. **Extreme Right-Wing ideology** is resurgent. Other ideologies are less present, but still have the potential to motivate, inspire and be used to justify terrorism.

4.2 In the UK, the primary domestic terrorist threat has in recent years come from **Islamist terrorism**. Islamist terrorism is the threat or use of violence as a means to establish a strict interpretation of an Islamic society and many adherents believe that violence (or 'jihad' as they conceive it) is not only a necessary strategic tool to achieve their aims, but an individual's religious duty.

4.3 The greatest number of Prevent referrals now involve **Extreme Right-Wing ideologies**. Individuals and groups may subscribe to ideological trends and ideas broadly characterised as Cultural Nationalism, White Nationalism and White Supremacism and often from more than one category of those mentioned above. Unlike Islamist terrorist groups, Extreme Right-Wing terrorists are not typically organised into formal groups with leadership hierarchies and territorial ambitions, but informal online communities which facilitate international links.

4.4 Prevent also tackles **other ideologies and concerns** that may pose a terrorist threat.

4.5 Established terrorist narratives exhibit common themes such as **antisemitism, misogyny, antiestablishment, anti-LGBT grievances and religious or ethnic superiority**.

4.6 **Left-Wing, Anarchist and Single Issue Terrorism** currently represents a significantly smaller terrorist threat to the UK than Islamist terrorism or Extreme Right-Wing Terrorism and is not currently present in the UK at any significant scale (although there has been some activity that has met a terrorism threshold in recent years). The majority of related activity in the UK has consisted of lawful protest, and where these have involved violence, it has resulted in offences relating to public order.

4.7 **Conspiracy theories** can act as gateways to radicalised thinking and sometimes violence. In some cases, a blurring of ideologies with personal narratives makes it harder to assess the risk that people may pose. The need to understand motivation and intent is why

in some cases it can take time for an incident to be declared terrorism or not, and why sometimes it remains unclear.

4.8 Counter-terrorism efforts encounter a range of personal and ideological motivations to violence, where a traditional terrorist narrative may only be part of a much more complex picture. Terrorists can hold a range of personal grievances alongside the primary ideology for committing an attack. Individuals are increasingly adopting a mix of ideas from different ideologies into their grievance narratives. This contributes to the increasing challenge of assessing the motivation behind an individual's violence, determining the most appropriate mitigations to put in place and judging whether or not that violence constitutes an act of terrorism.

4.9 It is possible that violent adherents to movements and subcultures, such as **Involuntary Celibacy (Incel)**, could meet the threshold of terrorist intent or action, should the threat or use of serious violence be used to influence the government or intimidate the public.

5 University Prevent actions (updated in accordance with April 2021 guidance review)

5.1 Under the [Counter Terrorism and Security Act 2015](#) the government created Prevent duty guidance: for higher education institutions in England and Wales, specifically for **higher education** bodies. The **Office for Students** (OfS) has been delegated authority to monitor higher education providers and how they prevent people from being drawn into terrorism. The [Prevent Duty in Higher Education - Training & Guidance for Practitioners](#) (Apr 24) provides lots of information.

5.2 Further to the above the government created Prevent duty guidance for further education institutions in England and Wales, specifically for **further education** bodies. Since January 2024 the [Prevent Duty Guidance](#) applies. Monitoring and enforcement is carried out by Ofsted; safeguarding is inspected as part of leadership and management judgement.

5.3 The following areas are addressed:

- **Freedom of Speech / External Speakers**
 - policies and procedures in place for the management of events on campus and use of all premises, relevant to all staff, students and visitors and clearly set out what is required for any event to proceed.
 - in carrying out the Prevent duty, the University must have particular regard to the duty to ensure freedom of speech and to the importance of academic freedom.
 - a balance of legal duties in terms of both ensuring freedom of speech and academic freedom, and also protecting student and staff welfare. (Although it predates the legislation, Universities UK produced guidance in 2013 to support institutions to make decisions about hosting events and have the proper safeguards in place. [The Charity Commission also produced guidance on this matter](#)

- ensure a platform is not provided for encouragement of terrorism and inviting support for a proscribed terrorist organisation - which are both criminal offences.
- consider carefully whether the views being expressed by a potential speaker, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. (In these circumstances the event should not be allowed to proceed).
- Risk assess any event planned and demonstrate that staff involved in the physical security of the estate have an awareness of the Prevent duty; this could be achieved through engagement with the Association of University Chief Security Officers (AUCSO).
- Additionally, institutions should pay regard to their existing responsibilities in relation to gender segregation -

See AUP [Freedom of Speech & Academic Freedom Policy](#)

- **Partnership**

- Active engagement is expected from senior management of an institution with other partners including police and regional education Prevent coordinators.
 - The University achieves this through membership of the Plymouth Prevent Partnership and attending DfE or police-led HE/FE Prevent / Counter Terrorism Police (CTLP) briefings.
- Institutions are expected to seek to engage and consult students on their plans for implementing the duty via the Student Union and relevant committees / working groups.
- Institutions are expected to have regular contact with the relevant Prevent coordinator. These coordinators help with compliance with the duty and can provide advice and guidance on risk and on the appropriate response.
 - Regional coordinators are on the [list of further and higher education Prevent coordinators](#).

- **Risk**

- Risk assessments to be carried out which assesses where and how their students might be at risk of being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- The risk assessment would be expected to look at institutional policies regarding the campus and student welfare, including equality and diversity and the safety and welfare of students and staff. Also expected to assess the physical management of the estate including policies and procedures for events held by staff, students or visitors and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.
- With the support of co-ordinators, and others as necessary, any institution that identifies a risk should develop a Prevent action plan to set out the actions they will take to mitigate this risk.
 - Prevent Risk Assessment & Action Plan is a standing item on the Safeguarding Committee.

- **Training**

- Compliance with the duty will also require providers to demonstrate Prevent awareness training and other training that could help the relevant staff prevent people from being drawn into terrorism and challenge extremist ideas which risk drawing people into terrorism. Appropriate members of staff are expected to have an understanding of the factors that make people support terrorist ideologies or engage in terrorist-related activity. Such staff should have sufficient training to be able to recognise vulnerability to being drawn into terrorism, and be aware of what action to take in response. This will include an understanding of when to make referrals and where to get additional advice and support.
 - All staff undergo biannual Safeguarding and Prevent training.
- HE providers are expected to have robust procedures both internally and externally for sharing information about vulnerable individuals (where appropriate to do so). This should include appropriate internal mechanisms and external information sharing agreements where possible.

- **Pastoral Support**

- HE providers have a clear role to play in the welfare of their students and it is expected there to be sufficient pastoral support available for all students.
- As part of this, providers are expected to have clear and widely available policies for the use of prayer rooms and other faith-related facilities. These policies should outline arrangements for managing prayer and faith facilities (for example an oversight committee) and for dealing with any issues arising from the use of the facilities.

- **IT Policies**

- HE providers are expected to have policies relating to the use of their IT equipment. and to contain specific reference to the statutory duty. HEIs should consider the use of filters as part of their overall strategy to prevent people from being drawn into terrorism.
- To enable providers to identify and address issues where online materials are accessed for non-research purposes, clear policies and procedures for students and staff working on sensitive or extremism-related research are expected to be seen. [Universities UK provided guidance on this.](#)
 - See AUP [Information Systems / Cyber Security Policy](#) and [ICT Acceptable Use Policy](#)

- **Student unions and societies**

- The Students' Union should also consider whether their staff, elected officers and student ambassadors would benefit from Prevent awareness training or other relevant training provided by the regional Prevent co-ordinator or University Prevent Lead

In addition, the University aims to fulfil these expectations by:

- having the Prevent Duty as part of this Safeguarding Policy

- having effective welfare support systems in the form of Student Support with links to local authorities and the Police and attending CTLP partner events as required
- having systems for assessing and mitigating risks around external speakers and events through the [Freedom of Speech and Academic Freedom Policy](#)
 - these apply to all staff, students and visitors and clearly set out what is required for any event to proceed while balancing legal duties in terms of both ensuring freedom of speech and academic freedom, and also protecting student and staff welfare.
- arranging ongoing Prevent training as part of mandatory safeguarding training
 - expecting appropriate members of staff (such as safeguarding roles / Student Support) to have an understanding of the factors that make people support terrorist ideologies or engage in terrorist-related activity. Such staff should have sufficient training to be able to recognise vulnerability to being drawn into terrorism, and be aware of what action to take in response including an understanding of when to make referrals and where to get additional advice and support.
- having an [Information Systems / Cyber Security Policy](#) and [ICT Acceptable Use Policy](#) that includes coverage of the Prevent Duty.
- ensuring our IT procedures include the filtering of inappropriate and harmful content and regular screening to protect students and staff from radicalisation. Requests for access to restricted content will be considered according to research ethics.
- engaging and consulting with students on the Duty and developing cross-University Prevent awareness in staff and students.
- having an embedded Student Union in the University with a President who is a member of the Safeguarding Committee and Equality, Diversity & Inclusion Committee and with training in Prevent provided for SU Executive Officers and Student Representatives of academic programmes.
- having clear and widely available policies such as the Equality, Diversity & Inclusion Policy for the use of faith-related facilities and signposting accordingly to external centres and support.
- delivering training to ensure students access the internet responsibly and critically to ensure their own personal safety.
- having a Prevent Risk Assessment and Mitigation Plan that is presented to each Safeguarding Committee meeting.

6 Channel

6.1 [Channel](#) was first piloted in 2007 and rolled out across England and Wales in April 2012. Channel is a **voluntary, confidential programme** which provides support to individuals who are vulnerable to being drawn into any form of terrorism. The programme was placed on a statutory basis in the Counter-Terrorism and Security Act 2015. Channel is used for:

- identifying individuals at risk;
- assessing the nature and extent of that risk; and
- developing the most appropriate support plan for the individuals concerned

6.2 Prevent fits into Channel's safeguarding processes and will be considered alongside other early intervention measures. Their own safeguarding officers will initiate the Prevent

process for an individual through Channel in consultation with the South West Channel Regional Coordinator. It is important to remember that Prevent and Channel operate outside of the criminal space.

7 Ofsted

7.1 Ofsted's [Education Inspection Framework](#) makes specific reference under 'Leadership and Management' to the need to have safeguarding arrangements to promote students' welfare and prevent radicalisation and extremism. Paragraph 29 of the EIF states:

Inspectors will make a judgement on the effectiveness of leadership and management by evaluating the extent to which:

- *the provider fulfils its statutory duties, for example under the Equality Act 2010, and other duties, for example in relation to the 'Prevent' strategy and safeguarding, and promoting the welfare of learners.*

7.2 Ofsted inspectors will always comment on whether safeguarding arrangements for learners are effective or otherwise.

7.3 ESFA should be informed via the Enquiries Form for Pre Degree students:

- Where a referral has been made, or
- where we are aware of an incident, or pattern of incidents, which undermines the promotion of British fundamental values or the ability of the University to comply with the Prevent duty,
- or make a referral of an individual member of University Personnel for the purposes of determining whether that member of University personnel should be referred to a panel for the carrying out of an assessment under section 36 of the CounterTerrorism and Security Act 2015 of the extent to which that individual is vulnerable to being drawn into terrorism.

8. Counter Terrorism Local Profile (CTLP)

8.1 Counter-terrorism local profiles (CTLPs) identify the threat and vulnerability from terrorism and extremism relating to terrorism in local areas. A CTLP helps the police and local partners understand and prioritise threat and vulnerability with suggested recommendations to address any risk. [CTLP guidance](#) is written for local partners, of which the University is one, and counter-terrorism leads setting out the key principles to encourage a consistent approach to CTLPs nationally.

8.2 The police forces in the South West have released the 2024 Counter Terrorism Local Profile (CTLP) to the partnership. This embeds the principles of **Notice, Check, Share**'.

NOTICE the change in behaviour, use of language or other Prevent related concerns.

CHECK your concern with the Designated Safeguarding Lead

SHARE your concerns with Counter Terrorism Policing by submitting a referral - remembering to submit as much detail as possible taking note of the prompts on the referral form to allow the police to make an accurate assessment.

9. Information available

9.1 During the period of lockdown and school / university/college campus closures during the period of the Covid-19 coronavirus pandemic, the numbers of Prevent referrals decreased. However, police and partner concerns were that the risk was still high and arguably had grown but the effects were not clearly seen as most radicalisation takes place online.

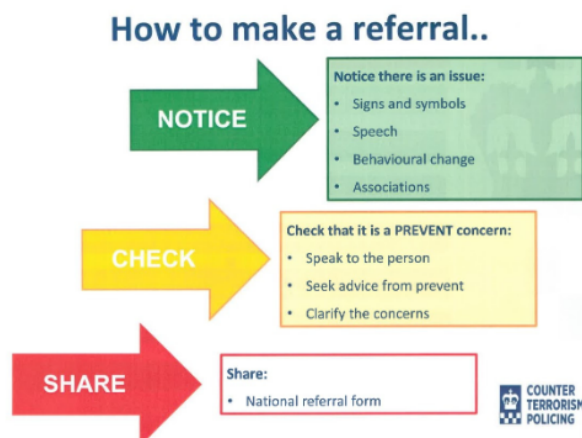
9.2 Increased time alone or on the internet exacerbated these concerns and is something that all staff should be aware of as students join college/university after school or return to campus if already at college/university.

9.3 The [Act Early Safeguarding campaign](#) which focuses on the theme of 'friends and family' is a government website designed to prevent radicalisation.



9.4 The [website](#) is designed to increase awareness of the signs of radicalisation, where to go for help and support and to increase understanding and confidence in the referral process. See also the [Act Early Video](#)

10. Making a referral



Appendix A



Please see Appendix C for key personnel:

Links to:

[AUP Safeguarding Referral form](#)

Appendix B

Procedure for responding to sharing of nudes and semi-nudes

- **Sharing of nudes and semi-nudes ('sexting')**

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

- **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the Pre Degree DDSL and/or wider Student Support team.

- **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident, Pre Degree SEN coordinator / Learning Support Coordinator, and other safeguarding DDSLs.

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
 - If a referral needs to be made to the police and/or local authority children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (**in most cases, images or videos should not be viewed**)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The Pre Degree DDSL will make an immediate referral to police and/or local authority children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the safeguarding leads and the Head of Pre Degree - and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

- Further review by the DSL/DDSL

If at the initial review stage a decision has been made not to refer to police and/or local authority children's social care, the DSL/DDSL/Head of Pre Degree will conduct a further review to establish the facts and assess the risks. They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to local authority children's social care and/or the police immediately.

- Informing parents/carers

The DSL/DDSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

- Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

- Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 9 of this policy also apply to recording these incidents.

- Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL/DDSL will normally do this in the event of a suspicion or disclosure. Other

staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL/DDSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Appendix C

Internal Safeguarding Contacts

1 University contacts

- **Policy Holders**
Deputy Vice-Chancellor - Dr Robin Kirby Ext 310, rkirby@aup.ac.uk
Head of Compliance & Quality Systems - Jeff Wright, Ext 275, jwright@aup.ac.uk
- **Designated Safeguarding Lead (DSL) (with lead responsibility for Safeguarding and Prevent)**
Deputy Vice-Chancellor - Dr Robin Kirby Ext 310, rkirby@aup.ac.uk

The Vice-Chancellor should be contacted in the DSL's absence
- **Deputy Designated Safeguarding Lead (DDSL) - Higher Education**
Student Support & Wellbeing Manager - Charlie Bowyer, Ext 274, cbowyer@aup.ac.uk
- **Deputy Designated Safeguarding Lead (DDSL) - Pre Degree**
Information Advice and Guidance Coordinator -Carol Edwards, Ext 227, cedwards@aup.ac.uk
- **Deputy Designated Safeguarding Lead- Prevent**
Head of Compliance & Quality Systems - Jeff Wright, Ext 275, jwright@aup.ac.uk
- **Senior Safeguarding Officers**
Vicki Prout (Learning Support Coordinator), Ext 211, vprout@aup.ac.uk
- **Safeguarding Advisors:**
All staff within Student Support can advise on safeguarding concerns and refer on as appropriate
- **Lead Governor for Safeguarding including Prevent:**
Andrew Honey, ahoney@aup.ac.uk

Appendix D

External Safeguarding Contacts

Safeguarding / Child Protection

Multi-agency Safeguarding Hub / Plymouth (MASH)	Email: MASH@plymouth.gov.uk	01752 668000 Select Option 1 01752 346984 (out of hours) 01752 307160 (advice on referral)	If you are a professional with an urgent child protection concern make an immediate referral by calling the Multi-agency Hub - if the child is in real danger NOW call 999 You'll be asked to follow up your call by submitting an inter-agency referral form which you can download from the Plymouth Safeguarding Children Board website.
Multi Agency Referral Unit (MARU) for Cornwall	multiagencyreferralunit@cornwall.gov.uk	0300 1231 116	Call 999 if the child is in real danger now. If you are concerned about a child in Cornwall telephone MARU
Devon & Torbay Safeguarding Children Boards	mashsecure@devon.gcsx.gov.uk	0345 155 1071	If you are concerned about a child or young person in Devon contact the Multi-Agency Safeguarding Hub (MASH). Call 999 if the child is in real danger now.
Plymouth Children Safeguarding Board (PCSB)	https://plymouthscb.co.uk/ PCSB Business Unit Email: PSCP@plymouth.gov.uk Adult safeguarding	01752 307535 01752 346784 (out of hours)	Plymouth Safeguarding Children Board Floor 3 Midland House Notte Street Plymouth PL1 2EJ
Community Connections	communityconnections@plymouth.gov.uk	01752 668000 or 01752 398500	If you have concerns about a person aged 18 and over please contact the Community Connections team on 01752 304440 / 398500
UKCIS (UK Child Internet Safety)	ukccis.secretariat@culture.gov.uk		A group of more than 200 organisations drawn from across government, industry, law, academia and charity sectors that work in partnership to help keep children safe online.
NSPCC		0808 800 5000	Child Protection Helpline
Child-Line		0800 1111	Child Protection Helpline

First Light	hyperlinked to Firstlight		Based in Plymouth and is the lead agency for Plymouth Sexual Assault Referral Centre. The organisation supports men, women, children and young people who have been affected by rape and serious sexual assault.
Plymouth Sexual Assault Referral Centre (SARC)	https://sarchelp.co.uk/	0300 3034626 - 24 Hours	Hawthorne House Darklake View Estover Plymouth Devon PL6 7TL
Plymouth Domestic Abuse Services	Email pdas@sanctuary-housing.co.uk Plymouth Domestic Abuse Services	01752 252033	Domestic Abuse support
Refuge	National Domestic Abuse Helpline	0808 2000 247	Multiple ways to contact
Devon Splitz Support Service	Devon Splitz Email devon@splitz.org.cjsm.org	0345 1551074	Domestic Abuse support
MALE - Male Advice LinE	info@mensadvice.org.uk	0808 801 0327	Male advice
Andy's Man Club	Andys Man Club details	Hyde Park House	Safe space to talk about male issues with other men
Barnado's Exceed Service	http://www.barnardosexceed.org.uk/ exceed@barnardos.org.uk	01752 256339 07783 801218	Child exploitation support / advice phoebe.evans@barnardos.org.uk
Prevent Contacts			
Regional Prevent Education Coordinator for South West Counter-Extremism Division	Cheri.FAYERS@education.gov.uk	See HoCQS	DfE's Counter-Extremism Division investigates extremism concerns and allegations related to adults working in or connected to the education sector (from early years to HE). Click here to log any concerns directly via Gov.uk
Channel Plymouth Lead	dave.ryland@plymouth.gov.uk prevent@devonandcornwall.gov.uk	01752 307387	PREVENT The Channel police practitioner will make an initial assessment and

	ll.pnn.police.uk (referral) channelsw@devonandcornwall.pnn.police.uk (referral)		advise. If the person is not suitable for Channel they can be directed to safeguarding and support services.
D&C Police Prevent Team	prevent@devonandcornwall.pnn.police.uk	01392 226514	For urgent referrals after 1715 or at the weekend call the Out of Hours Service on 01208 251 300 or MARU numbers in table above Contacts in Plymouth available from the Prevent lead
Other areas of support			
County Lines information	https://www.devon-cornwall.police.uk/contact	Crimestoppers 0800 555 111	If you see or suspect County Lines activity contact the Police via Email 101 or via the Intelligence Form or report, 100% anonymously to Crimestoppers . Partner agency information sharing form
National Illegal Money Lending Team	https://www.stoploansharks.co.uk/contact-us/ (Plymouth lead) or contact sheet on website	07864 928754 0300 555 2222 (hotline)	Team operating on behalf of the Government under Proceeds of Crime Act http://www.stoploansharks.co.uk/we-can-help/
University of Plymouth Neighbourhood Officer PC Kristy Monk	universityplymouthpolice@pnn.police.uk Contact HoSS, SU or HoCQS for partner services / contacts	See HoCQS	Local contact - can be via Student Support, SU or HoCQS

Additional support

Furthermore, Samaritans offer an online service 'Step by Step' that provides practical support and guidance to help college and HEI communities (staff, students and family members) prepare for, and recover from, a suspected or attempted suicide.

<https://www.samaritans.org/how-we-can-help/schools/universities/>

Universities UK also offer advice on how universities may respond to student suicides.

[New guidance for universities on how to respond to student suicides](#)

Helpline around the world

This link provides helplines and crisis lines from countries around the world - useful if on overseas trips for example or if a student is visiting family overseas:

<https://www.therapyroute.com/article/helplines-suicide-hotlines-and-crisis-lines-from-around-the-world>

Appendix E

Safeguarding Definitions

The following definitions are mainly taken from NSPCC as well as government sources such as 'Working together to safeguard children'. Many of the definitions and advice therein via the links have been updated to include and account for Covid-19. For definitions / vocabulary relating to Prevent see Part 2 Paragraph 2.

Children

In this policy, as in the Children Acts of [1989](#) and [2004](#) respectively, a child is anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. The fact that a child has reached 16 years of age, is living independently or is in further education does not change their status or entitlement to services or protection under the [Children Act 1989](#).

Safeguarding and Promoting the Welfare of Children⁵

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Child Protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Categories of abuse for children (under 18)

The four main categories of abuse in safeguarding are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

See definitions below:

- **Physical Abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

- **Sexual Abuse**

⁵ [Working together to safeguard children 2018 \(revised Dec 20\)](#)

Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Emotional Abuse (including gaslighting)**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Neglect (Child)**

Neglect⁶ is the ongoing failure to meet a child's basic needs and is [the most common form of child abuse](#). A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm.

They may not get the love, care and attention they need from their parents.

A child who's neglected will often suffer from other [abuse](#) as well. Neglect is dangerous and can cause serious, long-term damage - even death.

Types of neglect are as follows:

- Physical neglect - failing to provide for a child's basic needs such as food, clothing or shelter. Failing to adequately supervise a child, or provide for their safety.
- Educational neglect - failing to ensure a child receives an education.
- Emotional neglect - failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. It's often the most difficult to prove.

⁶ [Horwath, 2007 \(taken from NSPCC website\)](#)

- Medical neglect - failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.
- **Neglect (Adult)**
Where an adult has care and support needs, neglect includes not being provided with enough food or with the right kind of food, or not being taken proper care of. Leaving the adult without help to wash or change dirty or wet clothes, not getting them to a doctor when they need one or not making sure they have the right medicines, all count as neglect.
- **Self-neglect (Adult)**
This not the same as self-harm/suicidal ideation. Self-neglect can lead to self-harm/suicide - or other forms of abuse. Conversations to uncover the root causes may well result in a decision to signpost through other pathways but could at any point become a safeguarding matter.

To meet the threshold for self-neglect in order to receive support/funding from Adult Social Care, they would be unable to achieve **two** of the following specified outcomes under the eligibility criteria of the Care Act 2014:

- Managing and maintaining nutrition
- Maintaining personal hygiene (has physical access to and the ability to use cleaning facilities)
- Managing toilet needs
- Being appropriately clothed
- Being able to make use of the home safely
- Maintaining a habitable home environment
- Making use of necessary facilities or services in the local community

Other forms of abuse can include domestic abuse, online abuse, female genital mutilation, bullying and cyberbullying, child trafficking, harmful sexual behaviour and grooming.

Domestic Abuse

The cross-government definition of domestic violence is:

‘Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships⁷.

Online Abuse

⁷ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/>

Online abuse⁸ is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers.

Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships⁹. All staff should consider the context in which the incidents occur and ensure this is reported to the relevant authorities or to seek advice on the University's disciplinary procedures

Peer-to-Peer Abuse (also referred to as Peer-on-Peer)

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Peer-on-peer abuse takes place between children and young people and can be sexual, emotional, physical or financial and can involve coercive control within intimate or non-intimate relationships. Due to increasing concern about this issue, which has been recognised as one of the most common forms of abuse affecting children and young people, peer-on-peer abuse is now specifically recognised in [Keeping Children Safe in Education](#). An important aspect of peer-to-peer abuse is the wider context of where, when and how such abuse can occur so the contextualised safeguarding approach is particularly useful in addressing this abuse.

Examples may include:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery) and
- initiation/hazing type violence and rituals

Grooming

Grooming¹⁰ is when someone builds an emotional connection with a child to gain their trust for the purposes of [sexual abuse](#), [sexual exploitation](#) or [trafficking](#). Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for

⁸ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/>

⁹ <https://learning.nspcc.org.uk/news/2019/october/what-is-contextual-safeguarding>

¹⁰ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/grooming/>

example a family member, friend or professional. Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed or that what has happened is abuse.

The [NSPCC Grooming](#) page provides much more information on signs and how grooming happens.

Child Criminal Exploitation: [County Lines](#)¹¹

A common feature in 'county lines' drug supply is the exploitation of young and vulnerable people (often with multiple complex needs) who are targeted to act as drug runners or move cash as well as being the mules between the city locations and our rural and seaside drug markets. It's a competitive market with serious violence linked to maintaining control of a 'line' and the market share. In some cases the dealers will take over a local property, normally belonging to a vulnerable person. These homes become a 'trap house' or 'safe house' used to prepare and sell the drugs to the local market - this is known as cuckooing. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

County Lines or Dangerous Drug Networks operate in our area, and have exploited local vulnerable adults and young people in our schools and colleges and more recently reported in universities too - who are susceptible to the tactics used by the City-based Gangs to market their particular products and Line.

As has been seen in child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. It is vital that we all play our part to understand county lines and speak out if we have concerns.

D&C Police are particularly keen to get a good quality intelligence picture of County Lines exploitation across Cornwall so they and partners can take action both to safeguard those affected and disrupt criminal activity. Intelligence can be reported by staff or students by completing the simple online form [Partner agency information sharing form](#).

Child Trafficking

Child trafficking and modern slavery are child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold.

Children are trafficked for:

- [child sexual exploitation \(NSPCC\)](#)
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft.

¹¹ <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

Loan sharks

Linked to child exploitation and trafficking, the lending of money to young people (often to pay a drug debt) with astronomical interest rates and threats of violence / coercion to carry out criminal activities. There is a [government agency](#) (Report a Loan Shark) to help combat this illegal activity.

Child Sexual Exploitation (note: links are to NSPCC pages on each area)

Child sexual exploitation (CSE) is a type of [sexual abuse](#). Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be [groomed](#) and exploited [online](#).

Some children and young people are [trafficked](#) into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to [young people in gangs](#).

CSE is a hidden crime. Young people often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. It can involve violent, humiliating and degrading sexual assaults, including oral and anal rape. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child sexual exploitation doesn't always involve physical contact and can happen online.

When [sexual exploitation](#) happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the child's friends and family unless they take part in other sexual activity.

Images or videos may continue to be shared long after the sexual abuse has stopped.

Sexual exploitation is used in gangs to:

- exert power and control over members
- initiate young people into the gang
- exchange sexual activity for status or protection
- entrap rival gang members by exploiting girls and young women
- inflict sexual assault as a weapon in conflict.

Girls and young women are frequently forced into sexual activity by gang members.

Research by [Beckett \(2012\)](#) found girls considered to be engaging in casual sex were seen as forfeiting their right to refuse sex. The majority of sexual exploitation within gangs is committed by teenage boys and men in their twenties. In law, there's no specific crime of child sexual exploitation. Offenders are often convicted for associated offences such as

sexual activity with a child. Therefore it's not possible to obtain figures from police statistics of sexual exploitation offences ([Berelowitz et al, 2012](#)).

Gender or “so called ‘Honour’ based” violence or abuse

“an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community’s code of behaviour” (CPS)

Honour-based abuse, sometimes Honour-based violence (HBV)¹² is a term that is used to describe the action taken when a family or a community believes that the victim has breached the family's honour or the honour code, or it is believed that the victim may have brought shame or dishonour to the family or community. There is no specific offence of honour-based abuse, however there are a range of criminal offences committed within the honour-based abuse category. Offences can include physical assault, abduction, rape and murder.

HBV cuts across all cultures, nationalities, faith groups and communities. It can affect both males and females. Honour-based abuse transcends national and international borders. [Gender based violence - Refuge](#).

Female Genital Mutilation

All forms of HBV are abuses and should be escalated by the safeguarding officers to the relevant authorities.

[Female genital mutilation](#)¹³ is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence in England and Wales. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Unlike in Wales there is no statutory duty on FE College teaching staff to report to the police where they discover (either through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18. However, within the government regulations this is a grey area as it does include age 16-19 academies and therefore it the University policy that a report must be made if FGM on a girl under 18 is suspected. Information of when and how to make a report can be found at:

[Mandatory reporting of female genital mutilation: procedural information](#)

¹²

<https://www.devon-cornwall.police.uk/advice/advice-and-information/honour-based-abuse/honour-based-abuse-support-organisations/>

¹³ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>

Section 5.8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from University
 - Attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Breast flattening

Also known as breast ironing, this is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (ranging from a few weeks to years) in order for the breasts to disappear or delay the development of the breasts entirely.

In some families, large stones, a hammer or spatula that have been heated over hot coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts to prevent them from growing. More information is available at the [National FGM Centre](#).

Forced Marriage

The definition of forced marriage is in line with the offence under section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014. An arranged marriage is very different from a forced marriage. An arranged marriage is entered into freely by both people, although their families take a leading role in the choice of partner. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be emotional, physical or psychological. [Forced marriage - GOV.UK](#)

Upskirting

Typically involves taking a photograph under a person's clothing without their knowledge with the intention of viewing their genitals or buttocks for sexual gratification or cause the victim humiliation or distress. This is now a criminal offence. ['Upskirting' law comes into force - GOV.UK](#)

Sharing nudes and semi-nudes

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

Details on what to do in the event of such an incident coming to your attention can be found in this advice from UKCIS: [Sharing nudes and semi-nudes: how to respond to an incident](#). This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds - this is a form of child sexual abuse and must be referred to the police as a matter of urgency.

Money Muling

Money mules are recruited, sometimes unwittingly, by criminals to transfer illegally obtained money between different bank accounts. Money mules receive the stolen funds into their account, they are then asked to withdraw it and wire the money to a different account, often one overseas, keeping some of the money for themselves.

Even if you're unaware that the money you're transferring was illegally obtained, you have played an important role in fraud and money laundering, and can still be prosecuted.

Criminals will often use fake job adverts, or create social media posts about opportunities to make money quickly, in order to lure potential money mule recruits. Also known as squaring.

This has also been apparent recently in scams involving 'liking' Tiktok pages for money with demands for payment to access larger amounts of money.

<https://www.theguardian.com/money/2025/jun/15/earn-job-scammers-calls-texts-tiktok>

See [Action Fraud](#).

Significant Harm

There are no absolute criteria on which to rely when judging what constitutes **significant harm**. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development.

Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

Under section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002: '**harm**' means ill-treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; '**development**' means physical, intellectual, emotional, social or behavioural development; '**health**' means physical or mental health; and '**ill treatment**' includes sexual abuse and forms of ill-treatment which are not physical.

Under section 31(10) of the Act: Where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child.

Young Carer

A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

Parent Carer

A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.

Children missing from Education

All staff should be aware that children (under the age of 18) going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.

Children with family members in prison

Children who have family members in prison have been identified as being at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) (<https://www.nicco.org.uk>) provides further information.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Concerns should be raised with the Local Authorities if you are concerned that a child is homeless. The Homelessness Reduction Act 2017 places a new legal duty on English Councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and to work to help them retain their accommodation or find a new place to live. For those young people under 18 the safeguarding officers need to ensure appropriate referrals are made based on the child's circumstances.

Appendix F

Safeguarding Arrangements for those under 16 years old

The University does not deliver specific provision for students under 16 years of age (other than Young Arts (in paragraph 6)) but may occasionally accept students who start studying at the University just before or leading up to their 16th birthday.

- The DDSL (Pre Degree) will meet with and be available to support students under the age of 16.
- Under 16 year olds will be supervised at all times including lunch times.
- Under 16 year olds will not be permitted to leave the campus premises during the day without the express permission of their parent/carer or guardian.
- A register will be taken at the start of each session and parent/carer or guardian will be contacted by the University where there is an unauthorised absence recorded. In the event that a student under 16 leaves the University premises without permission the University will contact the parent/carer or guardian immediately.
- Travel arrangements to and from the University are the responsibility of the parent/carer or guardian and are not the responsibility of the University. When circumstances arise that require a student under 16 to be supported to return home, arrangements will be made only at the request of the parent/carer or guardian.
- The University will work collaboratively with the appropriate local authority in order to share information about the attendance and/or absences as the local authority considers necessary.
- The University will also inform the relevant local authority immediately if that person under 16 years old is removed so that the local authority can, as part of their duty, identify children of compulsory school age who are Missing in Education.

- **Safeguarding Arrangements for Young Arts Club**

The University runs a number of Saturday morning arts clubs known as [Young Arts Saturday Club](#). Young Arts is for all children in school years 5, 6, 7, 8 and 9 (aged ranges 9-14) where children are selected into groups by age so that they are working with their peers.

Young Arts students will be supervised at all times and on completion of sessions children aged under 16 are brought to the Pre Degree courtyard area to wait with their tutor for parents to collect them unless it is specified in the booking process that they will be making their own way home. An emergency mobile number is provided for parents who may be unable to collect children or who are delayed.

Young Arts tutors are assisted by Student Ambassadors and AUP student volunteers attend groups to share their skills and offer inspiration. All volunteers and student ambassadors are subject to Enhanced DBS checks and undergo mandatory Safeguarding training. **For any issues arising the Young Arts student's emergency contact should be called.**

Appendix G

Reporting and Dealing with allegations of abuse against members of staff

Introduction

In rare instances, staff of educational institutions have been found guilty of child abuse. Because of their frequent contact with children, young people, and vulnerable adults staff may have allegations of harm or abuse made against them. The University recognises that an allegation of harm or abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough, managed by HR and the DSP in most cases, and not subject to delay.

The University recognises that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations will do so with sensitivity and will act in a careful, measured way.

Receiving an Allegation

A member of staff who receives an allegation about another member of staff should follow the guidelines for dealing with disclosure and report this immediately to the DSP and Head of HR.

The allegation should then be reported immediately, in person, to the Vice-Chancellor and the following procedures should be followed:

- Obtain written details of the allegation from the person who received it and ensure that they are signed and dated. The written details should be countersigned and dated by the Vice-Chancellor (or delegated person such as the DVC / DSP)
- Record information about times, dates, locations and names of potential witnesses.

Initial Assessment

The Vice-Chancellor or DSP should make an initial assessment of the allegation, consulting with the Head of HR, and external organisations such as the Multi-agency Hub as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child or vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the [Local Safeguarding Children's Board](#) (LSCB) and the Police.

The initial assessment, which establishes the context and facts of the situation, should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or vulnerable adult. The matter should be addressed in accordance with the University staff disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Child protection enquiries by Children's Social Care or the police are not to be confused with internal disciplinary enquiries by the University. The University may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the University to act in a particular way; however, the University should assist the agencies with their enquiries.

The University shall temporarily suspend its own investigation, after initially establishing the material facts, while the formal police or Children's Social Care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing [Staff Disciplinary Policy & Procedure](#).

If there is an investigation by an external agency, for example the police, the Vice-Chancellor should normally be involved with this and contribute to the inter-agency strategy discussions. The Vice-Chancellor is responsible for ensuring that the University gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with enquiries, in the interests of the member of staff about whom the allegation is made. The Vice-Chancellor or Head of HR shall advise the member of staff that they should seek advice from the relevant Trade Union.

The Vice-Chancellor (or DSL) will consult with the police or other investigating agency, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Chair of the Board of Governors of the allegation and the investigation.
- HR (or a Designated Person) shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic. In respect of staff other than the Vice-Chancellor, suspension can only be carried out by the Vice-Chancellor (or Deputy Vice-Chancellor by delegated authority). In respect of the Vice-Chancellor, suspension can only be carried out by the Chair of the Board of Governors (or Vice Chair by delegated authority). Where, in the following text, reference is made to the Vice-Chancellor, this means the Vice-Chancellor (or Deputy Vice-Chancellor by delegated authority) or if suspension of the Vice-Chancellor is being considered then it means the Chair of Governors (or Vice Chair by delegated authority).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal

from, specified duties. If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

Suspension should only occur for a good reason. For example:

- where a child or vulnerable adult is at risk
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct
- where necessary for the good and efficient conduct of the investigation.

Prior to making the decision to suspend, the Vice-Chancellor should interview the member of staff. This should occur with the approval of the appropriate agency if relevant; for example, if the police are engaged in an investigation the officer in charge of the case should be consulted.

The member of staff should be advised to seek the advice and/or assistance of their trade union and should be informed that they have the right to be accompanied by a work colleague. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to them at the meeting and prepare a response, although that adjournment may be brief.

If the Vice-Chancellor considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day.

Where a member of staff is suspended, the Vice-Chancellor should address the following issues:

- The Chair of the Board of Governors should be informed of the suspension in writing.
- The Board should receive a report that a member of staff has been suspended pending investigation; the detail given to the Board should be minimal and not include information that may identify either the staff member or child / complainant.
- Where the Vice-Chancellor has been suspended, the Chair or Deputy Chair of the Board of Governors will need to take action to address the management of the University.
- The parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension.

- Senior staff that need to know the reason for the suspension should be informed.
- Depending on the nature of the allegation, the Vice-Chancellor should consider whether a statement to the students of the University and/or parents/carers should be made, taking due regard of the need to avoid unhelpful publicity

The Vice-Chancellor shall consider carefully and review the decisions as to who is informed of the suspension and investigation. External investigating authorities should be consulted where relevant.

The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals. The suspension should remain under review in accordance with the Staff Disciplinary Policy.

It is important that consideration should be made of case law stating that a legal representative may represent an employee in relation to Safeguarding ([Article 6 of Human Rights Act - Right to a Fair Trial](#)), and that the employee has a right to a fair hearing and the right to legal representation where an individual is facing a criminal charge and the outcome might prevent someone working in their chosen profession.

The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing [Staff Disciplinary Policy & Procedure](#).

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The child or children or vulnerable adult making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to the University of the member of staff (if suspended).

The Vice-Chancellor (or DSP) should give consideration to what information should be made available to the general population of the University.

Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the agency as determined by local arrangements in order that other agencies may act upon the information.

In consultation with HR and the DSL the Vice-Chancellor shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.

- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child other than the alleged victim, consideration should be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained for a period of 25 years.

If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed of the University's statutory duty to inform the Secretary of State for Education under the Disclosure and Barring Service.

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Head of HR, Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising that could lead to the improvement of the University's procedures and/or policies and/or which should be drawn to the attention of the LSCB. Consideration should also be given to the training needs of staff.

Appendix H

Supplementary Guidance on Particular Safeguarding Issues (see also page 153 of [Keeping Children Safe in Education](#))

- [Going Too Far](#) (teaching resources)
- [Educate Against Hate](#) **UPDATED** (teaching resources)
- [Act Early Safeguarding campaign](#) **UPDATED** (Counter Terror Police advice)
- [Think You Know - NCA CEOP Education](#) (support for parents / carers)
- [Keeping Children safe in education \(September 2025\)](#) **UPDATED** (Gov)
- [Mandatory reporting of female genital mutilation procedural information](#) (Gov)
- [Safeguarding Children from female genital mutilation](#) (Gov)
- [NSPCC](#)
- [Online Tool to report child abuse to local council](#) (Gov)
- [Safeguarding children who may have been trafficked](#) (Gov)
- [Safe Young Lives: young people and domestic abuse](#)
- [Statutory guidance for homelessness](#) (Gov)
- [Forced Marriage](#) (Gov)
- [Safeguarding children from abuse linked to faith or belief](#) (Gov)
- [Child sexual exploitation: definition and guide for practitioners](#) (Gov)
- [Safeguarding children in whom illness is fabricated or induced](#) (Gov)
- [Preventing Bullying](#) (Gov)
- [Safeguarding Disabled Children](#) (Gov)
- [Counter-Terrorism Strategy. CONTEST](#) (Gov)
- [OfS - Counter-terrorism - the Prevent duty](#) (OfS)
- [Working Together to Safeguard Children 2018](#) (Gov)
- [Safe from Bullying in Further Education Colleges \(2009\)](#)
- [What to do if you are worried a child is Being Abused](#) - Advice for Practitioners (Gov)
- [Children Missing in Education \(2016\)](#) (Gov)
- [Disclosure and Barring Service \(DBS\)](#) (Gov)
- [Online Harms White Paper](#) (Gov)
- [Sexual violence and sexual harassment between children in schools and colleges](#) (Gov)
- [Prevent Duty Guidance](#) (Gov)
- [Channel Guidance](#) (Gov)
- [The Prevent Duty in higher education \(HE\): training and guidance for practitioners](#) (Gov)
- [Prevent for Further Education & Training](#) (Education & Training Foundation)
- [Money Muling video](#)
- [Responding to suicide](#)

Appendix I

Key Legislation

- United Nations Rights of the Child (1989)
- Children Act 1989 and 2004
- Human Rights Act 1998
- Education Act 2002 and 2011
- Female Genital Mutilation Act 2003 as amended by Serious Crime Act 2015
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012
- Immigration, Asylum and Nationality Act 2006
- Every Child Matters: Change for Children 2007
- Equality Act 2010
- Anti-Social Behaviour, Crime and Policing Act 2014
- Care Act 2014
- Online Safety Act 2023 - [Explainer](#)
- Counter-Terrorism and Security Act 2015
- [Revised Prevent Duty Guidance for England and Wales](#) 2015 (Revised 1 Apr 21)
 - Prevent Duty Guidance for Higher Education Institutions in England and Wales
 - Prevent Duty Guidance for Further Education Institutions in England and Wales
- Serious Crime Act 2015
- Homelessness Reduction Act 2017
- Data Protection Act (2018) incorporating General Data Protection Regulations (GDPR)
- Higher Education (Freedom of Speech) Act 2024
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) England and Wales Order 2014
 - *(The 1975 Order dis-applies specified provisions of the Rehabilitation of Offenders Act 1974 to permit questions to be asked about spent convictions and cautions (except where they are protected convictions and cautions) in order to assess a person's suitability for...certain types of employment...and... also permits spent convictions and cautions, or a failure to disclose them, to be a ground for excluding a person from types of employment).*

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Related procedures	• Disciplinary Procedures for Students • Health Wellbeing Support to Study Procedure
Related information:	See additional information at Appendices H / I
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