

## **SAFEGUARDING POLICY**

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## Policy Statement

Arts University Plymouth 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 two parts, encompassing both **safeguarding of children and 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.
  - the Duty of Care exists where one individual's actions or inactions could reasonably be expected to affect another person.
    - the University owes to each of its students a duty to take reasonable care for the well-being and health and safety of those 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 D) 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.**

## Part One - Safeguarding of Children and Vulnerable Adults

### 1 Roles and Responsibilities

- **All Staff must:**

- understand their safeguarding responsibilities
- comply with this policy and follow Safeguarding procedures
- successfully complete initial Safeguarding and Prevent induction training and thereafter complete refresher training every 2 years on a rolling basis.
- be responsible for providing a safe environment
- be responsible for identifying students who are at risk, require additional support and who are, or could be, suffering from significant harm/abuse
- be required to support multi-agency working when making decisions about the welfare of young people and vulnerable adults.
- read **at least Part one** of the Department for Education's most up to date [Keeping Children Safe in Education](#)<sup>1</sup> if working directly with those under 18 and if not then either Part 1 or the condensed version of Part one (Annex A to KCSIE - a condensed version of Part one)
- sign (electronically) to confirm that they have read Part One of [Keeping Children Safe in Education](#) when requested to do so

- **The Vice-Chancellor will:**

- designate overall responsibility for child protection and safeguarding activities including the appointment of a Designated Senior Person (DSP) who is a member of the Senior Leadership Team 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 Senior Person (DSP) and Designated Senior Safeguarding Officer (DSSO) to carry out their roles effectively, including the assessment of students and attendance at statutory discussions and other necessary meetings
- liaise with the DSP 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 DSP 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

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<sup>1</sup> Section 175 of the Education Act 2002

- 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 [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 Senior Person will:**
    - take senior leadership responsibility for safeguarding in the University
    - attend Safeguarding / Prevent refresher training every two years
    - provide advice to the Vice-Chancellor, SLT and governing body on safeguarding issues, including resource requirements
    - provide assurance to the governing body on safeguarding standards being met and staff involved in safeguarding being supported
    - chair a 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 be presented to the Board of Governors.
- **The Designated Safeguarding Officer and the Pre Degree Safeguarding Lead will:**
    - ensure Safeguarding Officers are supported and receive regular training
    - oversee the maintenance of appropriate and accurate record keeping
    - keep an up to date list of external agencies' contacts and referral processes
    - oversee the contact with appropriate agencies in the event of a safeguarding issue
    - attend training in Child Protection and Multi-Agency Working as required with [Plymouth Safeguarding Children Board](#) and thereafter attend refresher training every 2 years
    - arrange multi-agency meetings as required (on University premises)
    - advise the University on staff Safeguarding / Prevent training and refresher training across the University (together with Head of HR)
    - maintain "need to know in the child's interest" confidentiality and data protection in regards to sharing information within the University and externally
    - liaise with the current schools / institutions of new students and the agencies that they have been working with to ensure appropriate support is in place at the start of the course
    - advise the DSP of any concerns in relation to the daily operation of Safeguarding
    - provide an annual report on Safeguarding to be presented to the DSP
    - oversee the implementation of safeguarding staff and student training
- **Safeguarding Officers will:**
    - be the first point of contact for students and staff with safeguarding concerns
    - monitor students who require support and meet with them as appropriate

- raise awareness of emerging concerns and trends in safeguarding
  - 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
  - deliver Safeguarding / Prevent training as appropriate
  - deliver critical thinking and emotional resilience seminars to all students.
- **The Prevent Lead will:**
    - attend the Plymouth Prevent Partnership meetings (quarterly)
    - liaise with the Department for Education's Southwest Regional Prevent Coordinator for Education for advice as appropriate
    - make appropriate reports to the Safeguarding Committee
    - ensure staff members are updated with new information and threats
    - assist in the preparation of Prevent referrals
    - oversee the implementation of Prevent staff and student training in line with the safeguarding training provided by Pre Degree Safeguarding Lead.
    - Produce and send to the Office for Students (OfS) the Prevent accountability and data return on an annual basis.

## 2 Recruitment, selection and employment procedures

2.1 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](#).

2.2 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.

## 3 Disclosures

- **Procedure in the event of a disclosure**

3.1 The University is an agent of referral and not of investigation. 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.

3.2 Having informed the DSSO / DSL / Safeguarding Officers in the first instance by telephone or in person it is imperative that the person who becomes aware of the disclosure **immediately** provides full details (in the written format to ensure accuracy of the initial report) to Safeguarding Officers / relevant Safeguarding Lead. The information must include when the disclosure was

made, brief details of the disclosure, any evidence/witnesses of the event and any action that has already been taken.

**If the disclosure is regarding Female Genital Mutilation (FGM) and the student is under 18, this MUST be reported to the Police directly (see paragraphs 4.5-4.6)**

3.3 If a disclosure is made when Student Support staff (including DSSO / DSP) are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from the NHS (dial 111) or Police (dial 101). In these circumstances, any action should be shared with the Pre-degree Safeguarding Lead or Student Support as soon as it is practically possible. See Appendix A for flowchart.

3.4 The DSL will lead on liaising with other agencies. If a child is suffering, or is likely to suffer from harm, Student Support will contact Children's Social Care or the Police to refer to their **Child Protection Team** immediately. It is important to emphasise this when reporting the matter.

3.5 Due to the confidential nature of safeguarding/duty of care, the student support team will only contact you again if it is directly relevant to the safeguarding/duty of care concern. The Dignity at Study Policy and Sexual Violence & Misconduct Policy may also be referred to.

## 4 Legal Requirements

### • Legal Requirements – Pre-Degree

4.1 [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.

4.2 [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.

4.3 The Pre-degree Safeguarding Lead will provide support for staff in safeguarding matters as required and will liaise with other external services as appropriate.

4.4 Where a referral has been made by the University for a safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police, or an allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority) then the ESFA should also be informed via the General Enquiries Contact Form.

The [factual update](#) to Working Together to Safeguard Children 2018 reflects recent changes to legislation, including:

- Integrated Care Boards: from 1 July 2022, integrated care boards have replaced clinical commissioning groups as a result of the Health and Care Act 2022
- Public Health England: has now been replaced by the UK Health Security Agency and the Office for Health Improvement and Disparities (OHID), which is part of the Department of Health and Social Care, and by the UK Health Security Agency. The Chief Public Health Nurse role has transferred to OHID
- Domestic Abuse Act 2021: references to the Domestic Abuse Bill should be read as the Domestic Abuse Act 2021
- UK GDPR: references to the GDPR should be read as the UK GDPR. The UK GDPR is the retained EU law version of the GDPR. The UK GDPR sits alongside the Data Protection Act 2018

- **Legal Requirements - Female Genital Mutilation (FGM)**

4.5 As mentioned in paragraph 3 there is a [mandatory reporting duty](#) for concerns relating to **Female Genital Mutilation**.

4.6 Whilst all staff should speak to the DSL (or a Safeguarding Officer) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers<sup>2</sup> in the course of their work in the profession. If an act of FGM is disclosed or appears to have been carried out on a girl under the age of 18, this **must be reported to the police** without delay.

- **Legal Requirements – Prevent (All University Students)**

4.7 The [Counter-Terrorism and Security Act 2015](#) contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. Prevent is covered in Part 2 of this policy.

## 5 Safeguarding Arrangements for those under 16 years old

5.1 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 Pre Degree Safeguarding Lead 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.

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<sup>2</sup> 3 Section 5B(11) of the FGM Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) provides the definition for the term ‘teacher’: “‘teacher’ means – (a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).



- 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.

## **6. Safeguarding Arrangements for Young Arts Club**

6.1 The University runs a number of Saturday morning arts clubs known as [Young Arts 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.

6.2 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 that young people are making their own way home during the booking process. An emergency mobile number is provided for parents who may be unable to collect children or are delayed.

6.3 Young Arts tutors are assisted by Student Ambassadors and Arts University Plymouth student volunteers will 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.

## **7. Visitors**

7.1 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.

7.2 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.

7.3 The [External Speaker and Freedom of Expression Policy](#) should also be considered when external visitors are invited to address students from both Pre Degree and Higher Education.

## **8 Safeguarding Confidentiality and Sharing Information**

- **Safeguarding Systems and sharing**

8.1 Individuals who may be at risk want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals in relation to confidentiality.

8.2 Effective safeguarding systems are centred around the individual and this includes operating a “**need to know in the individual’s interest**” when considering the storage and sharing of information with other University staff.

It is absolutely critical that there is a full audit trail and the critical part of this process will be when the initial concern was raised.

Thus, it is imperative that the original member of staff who hears the concern provides **full written information** to Student Support / Safeguarding Officers / Safeguarding Leads, as appropriate.

8.3 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).

8.4 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’.

8.5 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. However, it is University Policy to inform a student’s Emergency Contact, should concern be at a level where the student’s immediate safety is at risk.

## Part Two - Prevent

### 1 Introduction

1.1 [CONTEST](#) (Counter-Terrorism Strategy) 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](#)<sup>3</sup>) 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 It is noted that there was an [Independent Review of Prevent](#) with the findings published in February 2023 with 34 recommendations. When these are passed in law this policy will be updated accordingly.

### 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 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)

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<sup>3</sup> CONTEST is currently being reviewed by the government.

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.”<sup>4</sup>

### **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 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 [Revised Prevent duty Guidance](#) of April 2021):

- **‘Radicalisation’** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **‘Extremism’** is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The government also includes in its definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- **‘Non-violent extremism’** is extremism, as defined above, which is not accompanied by violence.
- **‘Terrorism’** The current UK definition of ‘terrorism’ is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious

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<sup>4</sup> [Prevent Duty Guidance](#).

violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- **‘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.
- **‘Prevention’** in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
- **‘Interventions’** are projects intended to divert people who are being drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).
- **‘Vulnerability’** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to 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.

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

4.1 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.

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

*The guidance states that “Compliance with the Prevent duty requires that properly thought through procedures and policies are in place. Having procedures and policies in place which match the general expectations set out in [this guidance] will mean that institutions are well placed to comply with the Prevent duty. Compliance will only be achieved if these procedures and policies are properly followed and applied. This guidance does not prescribe what appropriate decisions would be - this will be up to institutions to determine, having considered all the factors of the case.”*

4.3 The following areas are addressed:

- **Campus events**
  - 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.
  - 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, as outlined in the [guidance produced in 2014 by the Equality and Human Rights Commission](#).
- **See AUP Freedom of Expression Policy**

- **Partnership**

- Active engagement is expected from senior management of the HEI 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.

- **Training**

- Compliance with the duty will also require HEIs 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 to the Channel programme and where to get additional advice and support.

- HEIs 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 chaplaincy and 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**

- HEIs 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 HEIs 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 ICT Policy**

- **Student unions and societies**

- Policies should set out what is expected from the student unions and societies in relation to Prevent including making clear the need to challenge extremist ideas which risk drawing people into terrorism. We would expect student unions and societies to work closely with their institution and co-operate with the institutions' policies.
- The Students' Unions 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 External Speaker and Freedom of Speech 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 DSSO/ SOs / 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 to the **Channel programme** 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.

#### 4 Channel

[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

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.

#### 5 Ofsted

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.*

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

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.

## **6. Counter Terrorism Local Profile (CTLP)**

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. The CTLP recommendations (as briefed by Devon and Cornwall Police CTP to partners in May 2019) are at Appendix I and are currently under review.

## **7. Prevent Toolkits and Support - Covid-19**

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 so much radicalisation takes place online. 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.

The [Let's talk about it](#) website has been produced which includes an article on [Staying safe online](#) with text clicking on hints and tips. In addition there is the [Act Early Safeguarding campaign](#) which focuses on the theme of 'friends and family'.

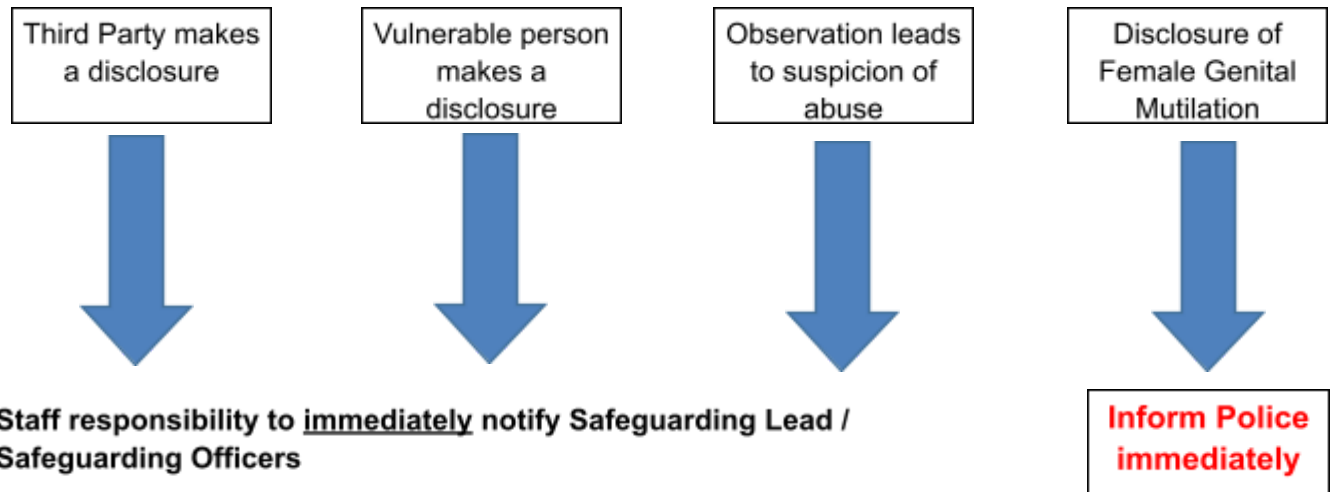


The [website](#) is designed to increase awareness of the signs of radicalisation, where to go for help and support and to increase understanding and confidence in the referral process. See also the [Act Early Video](#)

## Appendix A

### Safeguarding Procedures Flowchart

**To be completed within 2 hours of disclosure**



Staff responsibility to immediately notify Safeguarding Lead / Safeguarding Officers

by phone or in person and then complete:

#### Record of Events:

Date: \_\_\_\_\_ :

Time: \_\_\_\_\_

Name of complainant / names of those affected

Nature of alleged abuse:

Place where alleged abuse is happening:

Description of any injuries:

Your names and others who were present

Account of Allegation:

Email [studentsupport@pca.ac.uk](mailto:studentsupport@pca.ac.uk)

If Student is at immediate risk of harm you must accompany them directly to Student Support

**The record of events must be forwarded in an email marked 'Highly Restricted' to Student Support without delay**

The Student Support Team will respond within one hour during opening hours. They will contact relevant services, emergency contact and implement required action.

Due to the confidential nature of safeguarding/duty of care, the student support team will only contact you again if it is directly relevant to the safeguarding/duty of care concern.

## Appendix B

### Internal Safeguarding Contacts

#### 1 University contacts

- **Policy Holders**

Head of Compliance & Quality Systems - Jeff Wright, Ext 275, [jwright@aup.ac.uk](mailto:jwright@aup.ac.uk)

Head of Student Support - Kerry Dungay, Ext 274, [kdungay@aup.ac.uk](mailto:kdungay@aup.ac.uk)

- **Designated Senior Person (with lead responsibility for Safeguarding and Prevent)**

University Registrar & Deputy Vice-Chancellor - Dr Robin Kirby Ext 310, [rkirby@aup.ac.uk](mailto:rkirby@aup.ac.uk)

The Vice-Chancellor should be contacted in the DSP's absence

- **Designated Senior Safeguarding Officer**

Head of Student Support - Kerry Dungay, Ext 274, [kdungay@aup.ac.uk](mailto:kdungay@aup.ac.uk)

- **Designated Pre-Degree Safeguarding Lead and Prevent Single Point of Contact**

Pre Degree Safeguarding Lead and Information Advice and Guidance Coordinator - Carol Edwards, Ext 227, [cedwards@aup.ac.uk](mailto:cedwards@aup.ac.uk)

- **Safeguarding Officers**

Charlotte Bowyer (Lead Counsellor), Ext 222, [cbowyer@aup.ac.uk](mailto:cbowyer@aup.ac.uk)

Rachel Hamilton (Student Counsellor ), Ext 222, [rhamilton@aup.ac.uk](mailto:rhamilton@aup.ac.uk)

Susanna Wain (Student Support), Ext 213, [swain@aup.ac.uk](mailto:swain@aup.ac.uk)

- **Safeguarding Advisors:**

All staff within Student Support can advise on safeguarding concerns and refer to Safeguarding Officers if appropriate

- **Lead Governor for Safeguarding including Prevent:**

TBC

## Appendix C

### External Safeguarding Contacts

Safeguarding / Child Protection			
Multi-agency Safeguarding Hub / Plymouth  <b>(MASH)</b>	Email: <a href="mailto:MASH@plymouth.gov.uk">MASH@plymouth.gov.uk</a>	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 <b>child is in real danger NOW call 999</b>  You'll be asked to follow up your call by submitting an inter-agency referral form which you can download from the <a href="#">Plymouth Safeguarding Children Board</a> website.
Multi Agency Referral Unit (MARU) for Cornwall	<a href="mailto:multiagencyreferralunit@cornwall.gov.uk">multiagencyreferralunit@cornwall.gov.uk</a>	0300 1231 116	<b>Call 999 if the child is in real danger now.</b> If you are concerned about a child in Cornwall telephone MARU
<b>Devon &amp; Torbay</b> Safeguarding Children Boards	<a href="mailto:mashsecure@devon.gcsx.gov.uk">mashsecure@devon.gcsx.gov.uk</a>	0345 155 1071	If you are concerned about a child or young person in Devon contact the Multi-Agency Safeguarding Hub (MASH). <b>Call 999 if the child is in real danger now.</b>
<b>Plymouth Children Safeguarding Board (PCSB)</b>	<a href="https://plymouthscb.co.uk/">https://plymouthscb.co.uk/</a>  <a href="#">PCSB Business Unit</a>  Email: <a href="mailto:PSCP@plymouth.gov.uk">PSCP@plymouth.gov.uk</a>  <a href="#">Adult safeguarding</a>	01752 307535  01752 346784 (out of hours)	Plymouth Safeguarding Children Board Floor 3 Midland House Notte Street Plymouth PL1 2EJ
<b>Community Connections</b>	<a href="mailto:communityconnections@plymouth.gov.uk">communityconnections@plymouth.gov.uk</a>	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
<b>UKCIS (UK Child Internet Safety)</b>	<a href="mailto:ukccis.secretariat@culture.gov.uk">ukccis.secretariat@culture.gov.uk</a>		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.
<b>NSPCC</b>		0808 800 5000	Child Protection Helpline
<b>Child-Line</b>		0800 1111	Child Protection Helpline
<b>First Light</b>	hyperlinked to <a href="#">Firstlight</a>		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.
<b>Plymouth Sexual Assault Referral Centre (SARC)</b>	<a href="https://sarchelp.co.uk/">https://sarchelp.co.uk/</a>	0300 3034626 - 24 Hours	Hawthorne House Darklake View Estover Plymouth Devon PL6 7TL
<b>Plymouth Domestic Abuse Services</b>	Email <a href="mailto:pdas@sanctuary-housing.co.uk">pdas@sanctuary-housing.co.uk</a>  <a href="#">Plymouth Domestic Abuse Services</a>	01752 252033	Domestic Abuse support
<b>Refuge</b>	<a href="#">National Domestic Abuse Helpline</a>	0808 2000 247	Multiple ways to contact
<b>Devon Splitz Support Service</b>	<a href="#">Devon Splitz</a>  Email <a href="mailto:devon@splitz.org.cjism.org">devon@splitz.org.cjism.org</a>	0345 1551074	Domestic Abuse support
<b>MALE - Male Advice LinE</b>	<a href="mailto:info@mensadviceonline.org.uk">info@mensadviceonline.org.uk</a>	0808 801 0327	Male advice
<b>Andy's Man Club</b>	<a href="#">Andys Man Club details</a>	Hyde Park House	Safe space to talk about male issues with other men
<b>Barnado's Exceed Service</b>	<a href="http://www.barnardosexceed.org.uk/">http://www.barnardosexceed.org.uk/</a>  <a href="mailto:exceed@barnardos.org.uk">exceed@barnardos.org.uk</a>	01752 256339  07783 801218	Child exploitation support / advice  <a href="mailto:phoebe.evans@barnardos.org.uk">phoebe.evans@barnardos.org.uk</a>
<b>Prevent Contacts</b>			
<b>Regional Prevent Education Coordinator for South West Counter-Extremism Division</b>	<a href="mailto:Cheri.FAYERS@education.gov.uk">Cheri.FAYERS@education.gov.uk</a>		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 <a href="#">here</a> to log any concerns directly via Gov.uk
<b>Channel Plymouth Lead</b>	<a href="mailto:dave.ryland@plymouth.gov.uk">dave.ryland@plymouth.gov.uk</a> <a href="mailto:prevent@devonandcornwall.pnn.police.uk">prevent@devonandcornwall.pnn.police.uk</a> (referral) <a href="mailto:channelsw@devonandcornwall.pnn.police.uk">channelsw@devonandcornwall.pnn.police.uk</a> (referral)	01752 307387	PREVENT The Channel police practitioner will make an initial assessment and advise. If the person is not suitable for Channel they can be directed to safeguarding and support services.
<b>D&amp;C Police Prevent Team</b>	<a href="mailto:prevent@devonandcornwall.pnn.police.uk">prevent@devonandcornwall.pnn.police.uk</a>	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
<b>Other areas of support</b>			
County Lines information	<a href="https://www.devon-cornwall.police.uk/contact">https://www.devon-cornwall.police.uk/contact</a>	Crimestoppers 0800 555 111	If you see or suspect County Lines activity contact the Police via <a href="#">Email 101</a> or via the <a href="#">Intelligence Form</a> or report, 100% anonymously to <a href="#">Crimestoppers</a> . <a href="#">Partner agency information sharing form</a>
National Illegal Money Lending Team	<a href="https://www.stoploansharks.co.uk/contact-us/">https://www.stoploansharks.co.uk/contact-us/</a> (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 <a href="http://www.stoploansharks.co.uk/we-can-help/">http://www.stoploansharks.co.uk/we-can-help/</a>
University of Plymouth Neighbourhood Beat Manager, (PC Tracey Godfrey, PC 6685)	<a href="mailto:16685@dc.police.uk">16685@dc.police.uk</a>	01752 487237 (x306637) 01752 487111 (x306511) 01752 487145 (x306545) 07710 076009	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 D

### 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 Children<sup>5</sup>

- 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**

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<sup>5</sup> [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**

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**

Neglect<sup>6</sup> 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.
- Medical neglect - failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

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**

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<sup>6</sup> [Horwath, 2007 \(taken from NSPCC website\)](#)

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 relationships<sup>7</sup>.

### **Online Abuse**

Online abuse<sup>8</sup> 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 relationships<sup>9</sup>. 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)

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

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

<sup>9</sup> <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

- 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

Grooming<sup>10</sup> 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 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](#)<sup>11</sup>

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

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

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

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.

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](#)).

### **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)<sup>12</sup> 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. ['Honour'-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](#)<sup>13</sup> 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](#)

### **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.

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<sup>12</sup> <https://www.devon-cornwall.police.uk/advice/threat-assault-abuse/honour-based-abuse/>

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

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. 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 E

### Adult Safeguarding - Vulnerable Adults

Definition of Adult in [Section 42 the Care Act 2014](#):

An adult who may be vulnerable to abuse or maltreatment is deemed to be someone aged 18 or over, who is in an area and:

1. Has needs for care and support (whether or not the authority is meeting any of those needs);
2. Is experiencing, or is at risk of, abuse or neglect; and
3. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Abuse is defined widely and includes domestic and financial abuse. The other crucial difference from the previous definition is that the duties apply regardless of whether the adult lacks mental capacity.

The [Care Act 2014](#) states; Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Abuse of adults does happen with some different types of abuse listed, which include:

- Physical abuse - being hurt or harmed either deliberately or through rough, careless or thoughtless behaviour
- Emotional abuse - being humiliated or made to feel anxious or frightened
- Financial abuse or theft - having money or possessions used by a third party in a detrimental way / loan sharking
- Neglect - not being made safe and comfortable or not receiving the care or treatment needed
- Sexual abuse
- Domestic abuse - examples include psychological, physical, sexual, financial, emotional abuse or 'honour'-based violence.
- Modern slavery - includes slavery, human trafficking and forced labour (note the University has a [modern slavery statement and policy](#)).
- Organisational abuse - include neglect and poor care within an institution or specific care setting such as a hospital or a care home.
- Self-neglect - includes not caring for personal cleanliness, health or surroundings.
- Cuckooing - use of a local property by exploiters / criminal gangs occupied by a vulnerable adult - used as a base for criminal activity

## Appendix F

### 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 SLT 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 Designated Senior Person (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 Registrar/ 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 DSP) 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 University Registrar 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 University Registrar 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 Procedure.

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 DSP 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 Senior Person and Lead Designated Person 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 G

### Supplementary Guidance on Particular Safeguarding Issues (see also page 153 of [KCSIE](#))

- [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 \(September 2023\)](#) **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 H

### 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
- 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)
- 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).*



## Appendix I

### Counter Terrorism Local Profile (CTLP) Recommendations

As a CTLP partner the University is provided with a copy of the recommendations. As they contain no intelligence, sources or specific institutions/people they can be disseminated as an 'official' document to more partners and practitioners than the confidential CTLP. However, those not applicable to the University have been removed with those applicable included below as part of the Prevent Policy. This is due to be updated Autumn 2022.

#### **Recommendation 1:**

All statutory partners should use the Local Authority Partnership Self-Assessment Tool contained within the Prevent Duty guidance to assess their delivery of Prevent, identifying areas of strengths and weaknesses. The results of the assessment should be fed into the local Prevent Board who will use the information and examples of good practice to develop local delivery.

#### **Recommendation 2:**

Partners should routinely consider the information they hold and participate in future iterations of the CTLP. Information provided by local authorities and their partners should highlight any current and emerging themes or vulnerabilities in local radicalisation and extremism, and indicate whether the threats, risks and vulnerabilities have changed or remained the same.

#### **Recommendation 8:**

Partner agencies should set up a process to quality assure the referrals their practitioners make. If not at time of submission (due to necessary time constraints in reporting) shortly after completion; to ensure they are appropriate, timely, and contain the necessary information. Areas for improvement should be identified and considered within awareness training.

#### **Recommendation 10:**

Prevent partner agencies to continue to explore and deliver ways of raising Prevent awareness thereby encouraging appropriate referrals at an early stage. Prevent refresher training should be considered within the learning and development structure. As part of their training all relevant staff in the partnership and its commissioned services should understand where to get additional advice and support to make new referrals, and how to make referrals to Prevent to help enable them to effectively safeguard vulnerable people.

#### **Recommendation 11:**

Prevent partner agencies and Boards should refresh their communication strategy around Prevent to ensure it provides clarity on the referral process. With simple access to information including spotting the signs of radicalisation and who to contact. Emphasising the importance of safeguarding. Equipping practitioners with clear guidance and leading to good quality referrals.

#### **Recommendation 13:**

The Prevent Partnership should continue the development of internet use and auditing policies with key organisations. Internet filtering software used by partners should be reviewed to ensure it is up-to-date and blocks extremist websites.

#### **Recommendation 17:**

Prevent partnerships to develop an outreach programme to engage and work with a range of community and civil society groups, both faith-based and secular, including a variety of educational

institutions. To train staff members and members of the community on identifying those at risk of radicalisation, and to build resilience in those who may be vulnerable in a way which is both proportionate and relevant. A key element of this programme should be through raising awareness and prevention of radicalisation which is perpetrated through the promotion of terrorist networks and materials via digital media.

**Recommendation 18:**

Partners to develop a consistent approach to identifying and challenging both proscribed and non-proscribed groups and individuals who may be assessed to hold extremist views and therefore pose a threat to vulnerable individuals.

**Recommendation 19:**

Partners and Prevent Boards to ensure structures are in place to enable the continued identification, report and counter messaging of extreme right wing groups that emerge, which has been seen in our area this year. Awareness around such groups should be given on an ad hoc basis when required, to public facing employees/ practitioners and police staff.

<b>Document version control</b>	
Policy title:	Safeguarding Policy
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Next review date:	Safeguarding Committee May 2024
Main amendments this review	<b>Updated Keeping Children Safe in Education</b> <b>Reference to Plymouth Safeguarding Children Board (PSCB)</b> <b>Requirement to electronically sign to say when KCSIE is read</b> <b>Part 1 Section 6 - Young Arts Club</b> <b>Part 1 Paras 8.4 - 8.5 informing emergency contacts</b> <b>Part 2 Para 1 - CONTEST description</b> <b>Part 2 Para 1.5 Prevent Review</b> <b>Part 2 Para 4.3 - SU</b> <b>App 4 - Glossary / Terminology - Money Muling added</b>
Related Statutes, Ordinances, & General Regulations	See legislation and guidance at Appendix H
Related policies:	<ul style="list-style-type: none"> <li>• Dignity at Study Policy (Bullying and Harassment)</li> <li>• Sexual Violence &amp; Misconduct Policy</li> <li>• External Speaker and Freedom of Speech Policy</li> <li>• Learning and Disability Support Policy</li> <li>• ICT Acceptable Use Policy</li> <li>• IT / Cyber Security Policy</li> <li>• Disciplinary Policy and Procedures (Staff)</li> <li>• Modern Slavery Statement and Policy</li> </ul>
Related procedures	<ul style="list-style-type: none"> <li>• Disciplinary Procedures for Students</li> <li>• Support for Study Procedure</li> </ul>
Related information:	See additional information at Appendix H
Policy owner and Lead contact:	Designated Senior Safeguarding Person Email: <a href="mailto:rwatson@aup.ac.uk">rwatson@aup.ac.uk</a> Head of Compliance & Quality Systems / Prevent Policy Lead Email: <a href="mailto:jwright@aup.ac.uk">jwright@aup.ac.uk</a> Head of Student Support / Designated Senior Safeguarding Officer Email: <a href="mailto:kdungay@pca.ac.uk">kdungay@pca.ac.uk</a>