

Safeguarding: UoC Children, Vulnerable Groups and Adults at Risk Policy (incorporating the Prevent Duty and Modern Slavery) 2021-22

Please note:

*This is **NOT the protocol which outlines how to deal with an emergency situation** for example, where a student/staff member is declaring they are suicidal. If there is an emergency you should deal with it as such by calling 999, then reporting to the University via a Safeguarding Officer: see www.cumbria.ac.uk/safeguarding. If the situation is less serious then please refer to: *Top Tips for Dealing with Distressed students* available <https://my.cumbria.ac.uk/media/MyCumbria/Documents/Top-tips-for-supporting-students-in-distress.pdf>*

Context

The following statements set the context for the University of Cumbria's Safeguarding Policy and are fundamental to our focus and planned actions;

The University of Cumbria, as a provider of Higher Education, recognizes that it has a range of legal duties and moral and ethical responsibilities, to ensure, so far as reasonably practicable, the health, safety and welfare of all individuals adults or children accessing its services and facilities.

The University has an enhanced duty in relation to children and adults at risk. The University has a wider Public Protection Duty and recognizes that risk of harm to children and adults may be from sources outside the University's control and encourages reporting of such concerns to the appropriate external statutory agencies.

The University is committed to protecting individuals from any type of violence including sexual exploitation, Female Genital Mutilation, modern slavery and exploitation in relation to County Lines.

The University recognizes that those who are radicalized are often at risk due to mental health, poverty, isolation, addiction or by virtue of a protected characteristic. Therefore, in line with best practice, Prevent is embedded into the broader Safeguarding agenda at the University.

The University recognizes the increased risks of radicalization due to increased online teaching and learning and the impact of Covid 19-related lockdown situations leading to increased anxiety and mental health issues due to isolation, lack of face to face interactions to pick up on changes etc,

The University forms part of the wider, external, safeguarding framework in place to support children and adults at risk.

Legal responsibilities and Compliance requirements:

The University has legal responsibilities or compliance requirements and/or seeks to demonstrate good practice in relation to:

- Child Protection of those under 18 (*Children's Act 2004*)
- Those vulnerable groups described in the *Safeguarding Vulnerable Groups Act (2006)* and *Safeguarding Policy: Protecting Vulnerable Adults (2020)* and to uphold the principles of approach outlined in said document
- *The Counter Terrorism and Security Act 2018*, the *Prevent Statutory Duty (2015)*, and the *OfS Prevent Duty: Framework for monitoring in higher education in England*

(2018) to have “*due regard to the need to prevent people from being drawn into terrorism*”

- Mandatory reporting in relation to Modern Slavery
- Mandatory reporting in relation to Female Genital Mutilation
- Mandatory reporting of Honour-based violence and forced marriage
- A Duty of Care to take reasonable steps to prevent harm occurring, where that harm is within the University’s reasonable control
- *Working Together to Safeguard Children* (2020)
- *The Equality Act* (2010) and Single Equality Scheme
- Inspectorate body requirements such as OFSTED, ESFA, OfS
- Professional Body requirements e.g., HCPC, NMC, NCTL

The accompanying Safeguarding and Prevent guidance and protocols, give definitions, wider contextual information, advice on how to handle disclosures and reporting requirements, together with details of roles and responsibilities. Please see:

www.cumbria.ac.uk/safeguarding

Policy Statement

The University:

- supports the principle that Safeguarding and Prevent are everyone’s responsibility and embeds Safeguarding and Prevent into activity across the University
- has Leadership and Management of Safeguarding and Prevent overseen at the highest level to ensure accountability and identifies key roles and responsibilities across the organization
- has Risk Assessments in place for Safeguarding and Prevent and manages delivery through associated Action Plans for both areas and by ensuring protocols and policies are in place. The Risk Assessments take into account the nature of the University’s provision, its student and staff make up, and its geographically diverse locations.
- Conducts an annual review of the Safeguarding and Prevent Policy, publishes an annual report on Safeguarding and Prevent and complies with associated OfS Prevent and other monitoring requirements
- Aims to ensure:
 - Students (including apprentices) are supported across their journey to successful study outcomes
 - staff and students have a healthy and safe environment, with a range of support services available and appropriate policies and procedures in place
 - it takes appropriate action to safeguard individuals and those around them including:
 - having correct safer recruitment of staff and students in accordance with the DBS Vetting and Barring requirements to deter, reject or identify people who might abuse children or adults at risk or who are otherwise not suited to working with these groups
 - ensuring that students and staff have an awareness of Safeguarding and Prevent but in particular, are made aware of how to report concerns of any type and are encouraged to do so

- a swift response to any concern and to provide support for staff, students and its partners, to “do the right thing” when they have a concern
- proportionality; making sure our actions are appropriate to the situation and the individual
- access to training/information for staff as relevant so they feel supported to deliver in their roles
- is committed to a person-centered approach, putting the alleged victim at the heart of the process (unless for legal reasons reporting has to be carried out without their consent)
- takes mental capacity, confidentiality, informed consent into consideration in its approach, but cannot guarantee this eg where there is deemed to be serious risk to self or others or where directed to act otherwise by an external statutory agency
- engages proactively with external agencies as appropriate
- expects organisers of activities involving under 18s to take responsibility for familiarizing themselves with the University’s policies and procedures;
- reserves the right to request relevant Safeguarding and Prevent documentation and assurances from third party entities e.g. contractors or placement providers and expects third parties with their own safeguarding procedures to implement them and then report to the University where one of our staff or students is involved in a concern on their premises.

This policy is supported by a range of protocols, information and guidance which can be found at www.cumbria.ac.uk/safeguarding.

Scope

This policy and its accompanying protocols apply to every member of the University community including:

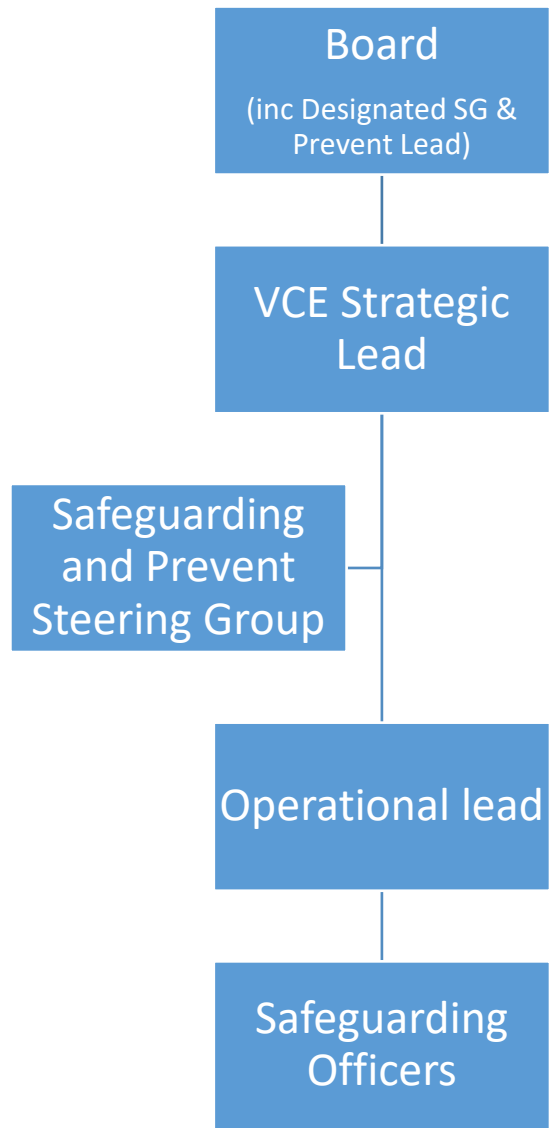
- All staff and students of the University of Cumbria
- All of its partners
- Any organisation bringing under 18s or vulnerable adults onto its premises
- Prospective students engaged in university activities
- External contractors and visitors to the University

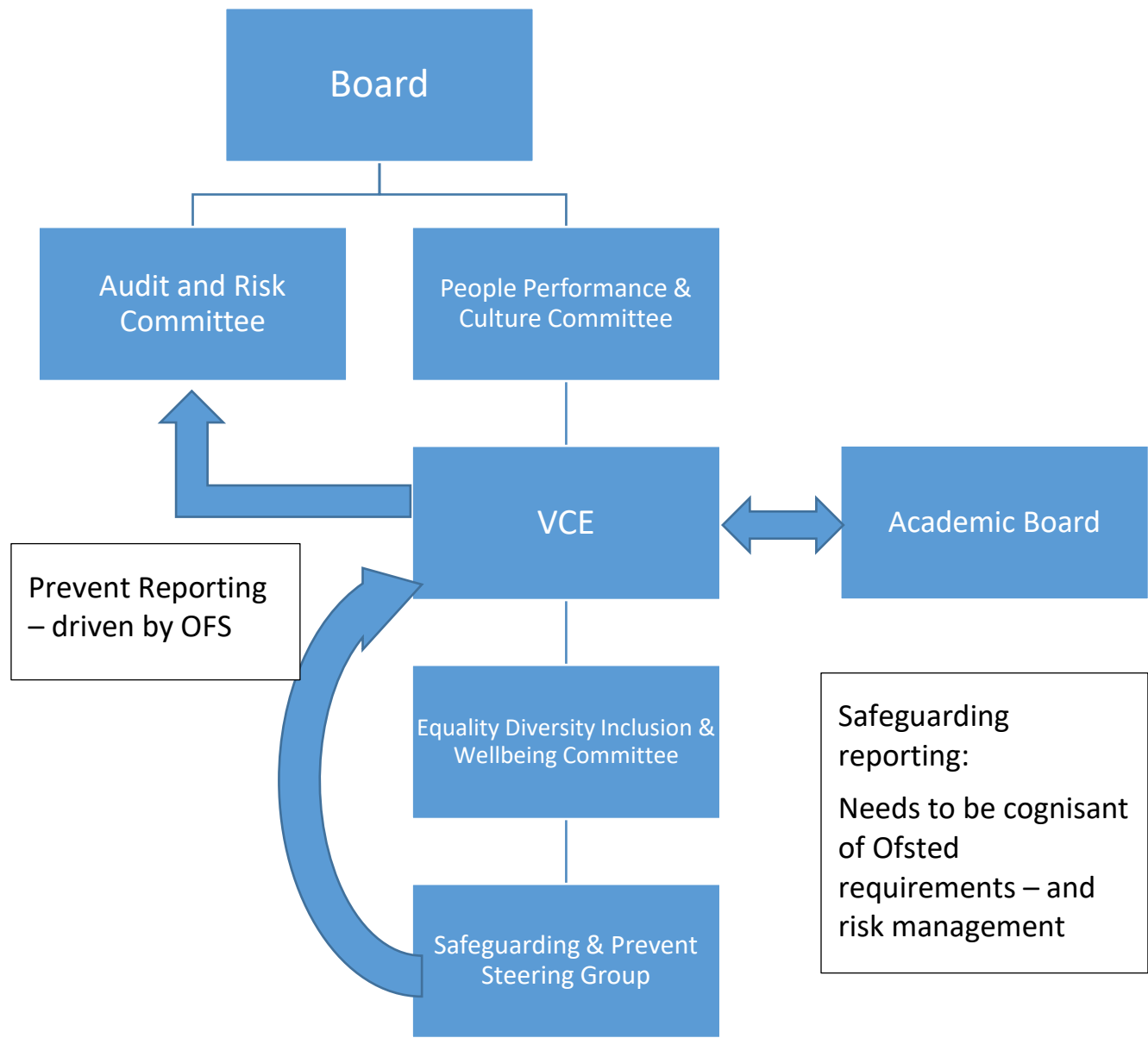
The University recognizes that students and staff, whilst they may not fall under statutory definitions of Safeguarding, may face barriers to success at times for which they require support. Groups to be aware of include (but are not limited to):

- care leavers/care experienced
- adult carers
- estranged students
- those who are or become disabled or have mental health condition diagnosed whilst at university
- those who may have been subject to bullying/harassment of any type(including cyberbullying or peer to peer bullying)
- those subject to abuse
- asylum-seekers
- migrants
- those who may be living away from home for the first time
- those living in an environment with domestic violence, coercive or controlling behavior
- victims of trafficking or exploitation by criminal gangs or organized crime.

Roles and Responsibilities

Safeguarding is everyone's responsibility. In addition to this general responsibility, different role holders across the University have specific duties, as set out in full in the Safeguarding: Roles and Responsibilities document (appendix 1) but summarised in the flow chart below showing key management structures and the wider roles and responsibilities.





- **Definitions in relation to this policy and its procedures**

'Safeguarding' is a term used to describe how we protect adults and children from abuse, neglect and harm from themselves or others. Although it has a statutory context, it is applied here to include wide range of individuals at the University who may be, or become, at risk.

The definition of a 'child or young person' applies to a person under the age of 18 years." For 'Looked After Children' this extends to 25, but the University recognizes barriers beyond this age limit for this group.

The definition of regulated activity relating to 'adults at risk' is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. The definition means "Any adult to whom an activity which is regulated activity relating to vulnerable adults as defined by the Act."

Full definitions of types of abuse that children and vulnerable groups might be subjected to can be found here www.cumbria.ac.uk/safeguarding.

"Radicalisation" is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

"Student" includes Higher Level Apprentices.

Review period: Annually

Support

Safeguarding information and a list of contacts can be found here:

www.cumbria.ac.uk/safeguarding

Details of support for staff and support for students can be accessed via:

www.cumbria.ac.uk/safeguarding

POLICY SCHEDULE	
Policy title	Safeguarding: Children, Vulnerable Groups and Adults at Risk Policy
Policy owner	DVC (Health, Environment & Innovation)
Policy lead contact	Head of Student Support
Approving body	Vice Chancellor's Executive
Date of approval	
Date of implementation	Immediate
Version no.	1.0
Review interval	1 year
Related policy Related Guidelines, Procedures, Codes of Practice etc.	Available at www.cumbria.ac.uk/safeguarding

Appendix 1: Safeguarding and Prevent Roles and Responsibilities: University of Cumbria 2021-22

Safeguarding is everyone’s responsibility. As staff and students, partners, placement providers or visitors to the University we all have a role to play in keeping each other and ourselves safe and we have a duty to ACT where safeguarding issues present themselves. The University takes a risk-based approach to safeguarding and Prevent. Directors of Institutes and Professional Services are responsible for ensuring safeguarding and Prevent are captured in policies and procedures and programmes as relevant to their area.

Role	Responsible for	How
University Board	Ensuring satisfactory mechanisms are in place for the discharge of the Prevent Duty, duty of care and statutory safeguarding at the University	Via receipt of reports via ARC and other committees as relevant including receipt of the overarching Safeguarding and Prevent Risk Assessment and Action Plans, policies and procedures via Audit and Risk Committee Declarations from Board Chair as part of OfS Annual data and accountability return.
	Identifying a nominated safeguarding/Prevent Board member	Board processes
	Undertaking relevant Safeguarding/Prevent training as Board members	Training recorded by Organizational Development in Human Resources and captured in Safeguarding/Prevent Annual Report
Strategic Safeguarding/Prevent Lead Accountable (Role held by the DVC Health,	Ensuring safeguarding and Prevent are afforded the utmost priority at the most senior level through their links to the Board, VCE and SLT	Ensuring nominated SG/Prevent Lead at Board Level
		Reporting to Board, (ARC) VCE, BAB and SLT
		Annual OfS Prevent reporting
		Safeguarding/Prevent Annual Report

Environment & Innovation)	Ensuring a staff and committee structure is in place to fulfill safeguarding and Prevent responsibilities	As above
	Ensuring procedures are in place for managing safeguarding allegations, whistleblowing, and safe recruitment practice	As above and via relevant HR policies
	Ensuring secure records relating to safeguarding are stored and shared appropriately	Records Management Policy
	Ensuring that monitoring review systems are in place to incorporate new guidance in line with external requirements and best practice, overseeing associated procedures, practice and guidance	Through established governance processes
	Taking the strategic lead for the Prevent agenda including being the named OfS contact.	Submission of ADR to OfS.
Safeguarding/Prevent Management Group (from the current ToR)	Oversight of the University's approach to safeguarding and Prevent including relevant aspects of Modern Slavery and associated planning, policies and procedures	Reporting to committees as required. Minutes of meetings. Papers to meetings SG/Prevent Audit
	The development, implementation and monitoring of both safeguarding and Prevent Risk Assessments and Action Plans to ensure compliance with statutory duties and good practice	Representation from key role holders in Professional Services and the Institutes responsible for the operationalisation of Safeguarding and Prevent Annual Audit of relevant areas

	Monitoring risk and mitigating actions in relation to safeguarding, Prevent and the relevant aspects of Modern Slavery	Annual Audit
	Providing input to, shaping and relevant critique of related policy and procedure documents and reporting as required	Annual audit and annual report
Lead Operational SG and Prevent Officer (Role held by the Head of Student Support) (Director of Student Services assumes the role in the LOSO's absence supported by the Mental Health and Wellbeing Manager)	Overseeing a network of Principal and Designated Safeguarding Officers including support for training as required	Production of Annual SG and Prevent Report including staff training and casework data
	Acting as key point for referrals to and from external agencies and liaising with eg Local Authority Designated Officers, Adult and Children's Services, the Independent Safeguarding Authority and local and regional Prevent leads, and making referrals to those agencies as required including to Channel for Prevent	Via network of contacts and clear contact information at www.cumbria.ac.uk/safeguarding
	Attending and contributing to Initial Strategy Meetings or provide information as required by external statutory bodies	SG Annual Report
	For having a working knowledge of how safeguarding procedures work at local, regional and national level	Ongoing liaison and training records
	For making referrals to Channel Panel for Prevent for students	SG/Prevent Annual report
Designated Safeguarding Officers	Acting as a source of support, advice and expertise when staff or students have a concern about possible risk or harm	List of Safeguarding Officers can be found at www.cumbria.ac.uk/safeguarding Casework is captured in the SG and Prevent Annual Report

	Referring cases of suspected abuse or allegations to the LOSO	as above
	Liaising with the LOSO regarding ongoing investigations	as above
	Liaising with the external agencies as required to support the LOSO	as above
	Keeping detailed, accurate records of any cases stored securely	Centralised by LOSO
Freedom of Speech and External Speakers nominated contacts	Director of Student Services	Safeguarding/Prevent Annual Report.
The Co-ordinating Chaplain	For ensuring appropriate SG and Prevent policies and protocols for Chaplaincy and the multi faith spaces are in place	Annual reporting, risk assessments
All staff	To be aware of the Safeguarding Policy and other university policies such as IT, Student and Staff, Progress Reviews	Briefings to raise awareness - Training Plan
	To raise concerns about their own support and safeguarding needs as soon as possible.	Via their Line Manager in the first instance
	To raise safeguarding and Prevent concerns about students as soon as possible	See www.cumbria.ac.uk/safeguarding for reporting process and contacts.
	To remain within the boundaries of their role and involve specialist student or staff support mechanisms	

	To ensure any staff or volunteers recruited to work with under 18s or vulnerable adults unsupervised undergo DBS checks where required	Working with Human Resources who can advise on DBS and compliance
	To complete required risk assessments for 18 students/volunteers or activities as required	Admissions/Starez identify under 18 – copy RAs for under 18s to LOSO who is also able to
	To engage in Safeguarding and Prevent training in line with mandatory UOC basic requirements and any other enhanced training required for their role	Training is recorded on My HR and statistics for mandatory training recorded in the Safeguarding and Prevent Annual Report
Head of Human Resources	Responsible for ensuring safer recruitment protocols are in place for staff and volunteers, in relation to both UKVI/right to work and DBS processes, which deter, reject or identify those who might abuse children or vulnerable adults, or are unsuited to working with them.	Annual Audit, HRes reports for compliance eg to International Compliance Group, Ofsted reports.
	To ensure appropriate support mechanisms are in place for staff impacted by handling safeguarding concerns and for vulnerable staff.	Human Resources protocols and wellbeing support information. EAP, Occupational Health, Annual audit.
	For making referrals of staff to Channel Panel process for Prevent	Annual Reporting via SG Annual Report
Director of Student Services	To ensure appropriate health, wellbeing and support services for students are in place	Service protocols, Business Plans, Annual Reports
Directors of Institutes /TLSE leads	To ensure that Institutes are guided by external requirements from professional bodies and inspectorates eg OFSTED/ESFA	Continued registration of programmes, OFSTED outcomes

	in relation to safeguarding and Prevent in relation to programme delivery	
Director of SAAS	Ensuring safe recruitment and admission of students including those under 18 on entry	Relevant policies and procedures relating to Under 18s, DBS, Admissions and OH, Ofsted Reports
Admissions Manager (SAAS)	Responsible for ensuring the LOSO and Programme Leads are alerted to under 18s admitted to programmes so risk assessments can be conducted by the PL's	Admissions policy, U18 RAs held by PLs and copy by LOSO
International Admissions/Compliance	To ensure appropriate UK guardianship contacts provided via admissions process for under 18 international students	Admissions files /student record
Residential Services Manager	To ensure parental consent for admission to halls for any under 18	Starez records
Residence Life/Accommodation Officer	To meet any under 18 in halls to go through under 18 checklist with them	Accommodation files show completed forms on audit
Director of Outreach	To ensure all activity with under 18s is risk assessed and the relevant policies and procedures are in place	Development of under 18 outreach and u18s on campus for outreach policy eg schools etc Evidence of appropriate risk assessments LOSO and H& S manager involved in risk assessments
Hello Future	To ensure all activity including that delivered online with under 18s is risk assessed and the relevant policies and procedures are in place	Development of under 18 policy and evidence of appropriate risk assessments including LOSO and H & S manager where required
Director of IT services	To ensure that relevant policies and procedures are in place to meet Prevent and safeguarding to requirements	Annual Audit/SGSG

Director of Research and Knowledge Exchange/Chair of Ethics Committee	To ensure research ethics protocols reflect safeguarding and Prevent	Annual Audit by SGSG
Sports Centre Manager	To ensure appropriate safeguarding processes are in place for any activities for under 18s of vulnerable adults eg summer sport camps etc Or that third parties delivering such activities have the relevant safeguarding protocols in place.	Annual Audit and risk assessments shared with LOSO
Head of Collaborative Provision	To ensure agreements with Partners clearly outline who is responsible for safeguarding and Prevent and how to report concerns.	Annual SG Audit.
UCSU	CEO -To ensure relevant SG and Prevent protocols are in place and staff undertake SG and Prevent training as relevant to their roles.	Annual Audit SGSG
Student and Staff parents and visitors or those acting in loco parentis	To ensure they remain in charge of any under 18 or vulnerable adult that they bring to campus (this is discouraged but we recognize childcare/care responsibilities can be an issue at times)	Students may need to bring children with them at times but we do not encourage bringing them to lectures, and for health and safety reasons they may not be permitted into some areas of the University
HLA Programmes	<p>Whilst apprentices are with the University for their study they fall under the University's Safeguarding/Prevent policies and procedures.</p> <p>Where employers are in sectors where they have their own safeguarding policies, apprentices will be expected to be inducted</p>	<p>SAR and HLA employer agreements</p> <p>SG Case Log</p>

	into the workplace policies and procedures and to work within them.	
	Where a safeguarding-related incident occurs in the employment setting, the setting should implement its own safeguarding protocols liaising with external agencies as appropriate. The setting should inform the agreed programme related contact or the UoC Lead Operational Safeguarding Officer	Cases captured in SG Annual report. STEP will allow third parties to raise/report SG and Prevent concerns.
	Where the University becomes aware of a safeguarding related issue or incident involving an apprentice, they will contact the employer's agreed safeguarding contact.	Annual Audit.
	Where the employer does not have its own safeguarding policy, they will be sent a link to the University's Safeguarding Policy and this should be part of the employer induction process from the HLA	Audit by HLA office
	Apprenticeship unit/Programme Leads to identify referral routes to employers and from employers for Safeguarding/Prevent concerns	Some agreements in place eg Paramedics
School Direct Programmes	It is expected that where safeguarding incidents occur within a school direct placement or partner setting that the third party organisation should deal with the safeguarding matter within its own policy and procedures, informing external	SG Annual Report

	agencies as required and keeping the University via the UPL appraised.	
	It is expected that if the University becomes aware of a safeguarding issue involving a school direct student, that the UPL will inform the school concerned.	Casework reporting in Annual Report where relevant
Lead School	Ensuring it establishes a reporting protocol for its partners in relation to dealing with Safeguarding/Prevent incidents so that parallel action by both parties can be taken eg instigation of the Student Code of Conduct etc	Partnership agreements
National Tutor Programme	Those tutors employed by the university who have a safeguarding/Prevent concern in relation to the pupil they are supporting should report concerns via the schools SG protocols but inform the NTP programme lead at UOC	Casework reporting
	If they have safeguarding concerns re a member of school staff they should report via the school's protocols but inform the NTP UOC programme lead.	Casework reporting
	If schools or others eg parents have concerns about the tutor, they should report to UOC NTP programme lead or the UoC Lead Operational Safeguarding Officer.	Casework reporting
Other Settings Involving UoC students	Ensuring implementation of their own safeguarding policy and reporting any concerns to the Lead Operational Safeguarding Officer at the University.	Casework reporting

Contractors	To comply with the Safeguarding and Prevent requirements as per their contracts	Contract Management Policy Signed Contracts Sign in at Reception and badges worn
Those booking Conference/event organisers etc on UoC premises	To comply with the Supervision of Minors clauses in the Conference and Events Booking Terms and Conditions. Those bringing under 18s onto campus are responsible for safeguarding them.	Conference office