Safeguarding Policy
(including anti-bullying and harassment policy)

Introduction

This policy sets out the expectations, duties and requirements of students and staff in respect to the safeguarding the wellbeing of members of the University community (including children and adults at risk) within the University.

The University is subject to statutory requirements in relation to both Safeguarding and Prevent, and takes all reasonable measures to ensure that risks of harm to children, adults at risk and others are minimised, including the risks of students being drawn into terrorism. These measures are in addition to those required under Health & Safety legislation.

As the University considers the wellbeing of its community to be a priority, this policy will expand on those requirements to work toward the safeguarding of all students and staff within the University.

Safeguarding is defined as "protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation, victimisation, abuse, neglect, sexual misconduct and violence." (Care Quality Commission). The University includes the risk of someone being drawn into terrorism (radicalisation) as a risk of harm or exploitation. Examples of issues that may be considered under this policy can be found in Appendix 1.

The University encourages staff and students to adopt a responsible approach to safeguarding and wishes to reassure complainants that we will respond promptly to all concerns raised under this Policy. Staff and students should be reassured that all reports, made in good faith, will be dealt with fairly and reasonably, regardless of the outcome.

The policy has 3 sections:

1.   Preventative Steps
2.   Reporting of Safeguarding Concerns
3.   Support for those affected by safeguarding concerns

There are also 4 appendices:

1.   Examples of safeguarding concerns
2.   Safeguarding procedure in detail
3.   Prevent Duty
4.   Definition of Terms

Applicability

The policy applies to activities that take place:

a)   on University premises;
b)   during off-site placements; and
c)   other off-site activities for which the University is responsible.

The University also reserves the right to request appropriate safeguarding policies and assurances from contractors used on and off premises.

The University will also offer support to students who experience harassment, victimisation, hate crime, sexual misconduct or violence, outside and independent of the University.

Behaviours covered by this policy includes the behaviour of:

- staff to students
- students to staff
- student to student
- staff to staff
- third parties to staff/students, staff/students to third parties including students on placement
- Third parties to other third parties but only where the activity has taken place on University premises and involves children or adults at risk. For example: Concerns around safeguarding in connection with groups hiring rooms from the University.

Not covered by this policy:

- Safeguarding issues that arise as a result of private agreements made outside the University by students, e.g. with private halls of residence, private landlords or private counselling. In such cases, the University may facilitate a referral or a discussion, but the student is expected to follow the procedures of the appropriate private organisation or the professional body. However, the University may consider using this policy when both parties (the reporter and reported) are London Met students or involve London Met staff.

Relevant Staff

The University has nominated staff to assume responsibility for safeguarding:

Lead Safeguarding Officer (LeSO) - has overall responsibility for the strategic and operational implementation of the policy and guidelines.

- concerns relating to children and vulnerable adults: Sarah Richardson, Head of Student Services (s.richardson@londonmet.ac.uk).
- concerns relating to radicalisation, violence against women, harassment and hate crime: Mark Ellul, Pro-Vice Chancellor, Student Services (m.ellul@londonmet.ac.uk).

Either Lead Safeguarding Officer may be contacted if the other is absent.

Local Safeguarding Officers (LoSO) – Each School and PSD has an officer responsible for providing immediate support, and for liaising with the Lead Safeguarding Officer and a reserve in case of absence.

If the Local Safeguarding Officer for the School / PSD and reserve are not available, a Local Safeguarding Officer from another School / PSD or a Lead Safeguarding Officer can be contacted.

Details of LoSO can be found on our Safeguarding webpages

Freedom of Speech within the Law

The University is committed to ensuring freedom of speech within the law for its employees, students and visiting speakers. Nothing in this policy is intended to limit staff or students' freedom of expression within the law.

Preventative Steps

The University takes seriously its safeguarding obligations and the requirement to take appropriate steps to prevent students from being drawn into terrorism. It therefore has in place a wide range of preventative measures, including the following:

Staff Recruitment: Recruitment procedures are in place to discourage and / or identify people who are not suited to working with children and adults at risk or individuals who past behaviour may indicate a risk in relation to violence against women, sexual misconduct, harassment or hate crime. At a staffing level, this includes advertising posts with a Disclosure and Barring Service (DBS) requirement as appropriate.

Student Recruitment: Departments are responsible for managing their own safeguarding procedures, which must be consistent with this policy. Students accepted onto undergraduate and postgraduate programmes, such as Social Work, Teacher Training and Youth Work are required to obtain a satisfactory enhanced disclosure from the DBS or Disclosure Scotland as part of the application process.

Student Placements: Course teams which have a compulsory placement component involving access to children or adults at risk will ensure that appropriate procedures and guidelines are in place for students on placement. These will be consistent with this Safeguarding Policy and be accompanied by course-specific action plans. All other students on placement are covered within this policy.

Student Employment: The University employs students to work within the University. Where the role involves contact with children and adults at risk, the same recruitment requirements should be in place as for staff recruitment and risks associated with violence against women, sexual misconduct, harassment or hate crime should be assessed and DBS obtained as appropriate.

Widening Participation: The University engages in a wide range of Widening Participation activities. As part of this, University staff will go into local schools and organise summer schools on campus. Staff and student receive specialist training and resources, and project-specific documentation where applicable.

Engagement of Contractors: The engagement of contractors and others to work on behalf of the University is governed by procurement and tendering procedures. The University will ensure that contractors and others are appropriately selected in accordance with the University's procurement procedures and policies.

Guidance & Support – This takes a variety of forms:

- Advice to students is available through the University website and through the services offered within Student Services, most significantly: the Counselling Service, the Disabilities and Dyslexia Service (DDS), the Student Money and Accommodation Advice (SMAA) team;
- Students are informed about safeguarding issues and reporting procedures during their induction to the University. This is followed up by the Students' Union, which organises campaigns on appropriate behaviours and reinforcing information about reporting procedures;
- The University is committed to working with other external organisations with a view to fostering a 'healthy' campus. Throughout the year, the Students' Union and teams within Student Services may invite relevant external groups/speakers to the University from external support groups.

Staff Support - Support for staff dealing with, or affected by safeguarding issues, is generally offered through their Line Manager. Human Resources and the Employee Assistance Programme. In addition, regular training is provided to nominated Safeguarding Officers.

Proactive Policies and Procedures - The University has in place a range of policies and procedures which are of relevance to the implementation of the Safeguarding Policy. These include: Health & Safety policies; policies covering appropriate use of IT and Social Media; policies and guidelines relating to students on placement; policies and procedures for managing complaints, grievances and disciplinary matters; and close working relationships with the police and local Prevent co-ordinators.

Training and Promotion - The University will ensure that all staff are aware of their responsibilities and, where appropriate, will provide training in safeguarding and Prevent awareness for staff and volunteers, in line with current policy, procedures and professional guidance. The University will also work with the Students' Union, the police and other relevant groups to promote a safe campus

Best Practice - The University will also endeavour to work to raise standards by participating in national 'kite mark' awards, such as those awarded by Stonewall in relation to LGBT issues.

Procedure for Reporting Concerns

The University requires any staff member, student or visitor who has a safeguarding concern to report it. Members of staff who become aware of safeguarding concerns or allegations must not make an independent decision to withhold the information, but should report it.

A concern may be that they have experienced (or witnessed someone else experiencing):
- Abuse (in many forms)
- Bullying and harassment, including hate crimes
- Radicalisation
- Violence against women.

More detailed guidance on the types of safeguarding concerns that are covered by this policy can be found in Appendix 1.

The University commits to taking such concerns seriously and to investigating any concerns that are made, and to taking action where appropriate and in line with current University policy.

Emergency situations

If there is an immediate concern of risk to life, violence or other emergency situation, staff and students must contact the emergency services by calling 999 and/or University security teams on 3333.

This action must then be followed up urgently with a Safeguarding report by the relevant staff member to their LoSO or via the report a concern form located on the [Safeguarding webpages.](#)

If such an incident is reported by students, the report should be made by the staff member made aware of the incident and it is their responsibility to ensure that a safeguarding report is submitted. Staff should also report such actions to their LoSO.

All other safeguarding concerns

Reports should be submitted as soon as possible via the report a concern form located on the [Safeguarding webpages](#)

OR

to the relevant Local Safeguarding Officer (LoSO) who will then report using the online link. Reports should contain all information and evidence as is available at that time.

Unless there are good grounds for doing otherwise, it is likely that the University will not take action when allegations are made anonymously. However, investigations can, in some instances, be carried out without disclosing the identity of the person making the complaint at the discretion of the LeSO.

Consideration process – overview

Having considered the concern and evidence, the LeSO shall determine what further steps to take, which may include:

- Referring the person concerned to relevant support services, such as to the Counselling Service or the Disabilities & Dyslexia Service (DDS); and/or
- Referring the matter to be considered under other University procedures such as the Student or Staff Disciplinary Procedure or Complaints Procedure.
- Reporting the matter to an external body, such as the police or the local authority.

The LoSO may also be requested to undertake further investigation or collation of additional information or evidence before a decision on the next steps is made.

Detailed information on the process, recordkeeping, and action taken can be found in **Appendix 2**.

Confidentiality

Confidentiality is necessarily limited by the law and by some university policies. The University is subject to statutory requirements to disclose information to external agencies in specific circumstances. This may happen without the consent of the individual reporting a cause for concern. Staff receiving a report should not give any assurance of confidentiality. Further information can be found in Appendix 3

Concerns that relate to criminal matters

The University reserves the right to report to the Police any incident which it believes may constitute a criminal offence.

It should be noted that the University does not undertake criminal investigations and individuals who believe that they are a victim of crime should report this to the police or other relevant authority.

Malicious allegations

The University will seek to ensure that this Policy is not used in a way which causes unwarranted detriment to others. The University will act when vexatious or malicious allegations are made, when false information is provided or when the complainant has otherwise acted in bad faith. In such circumstances, disciplinary action may be taken and any investigation based upon those allegations may be terminated.

Support for those affected by safeguarding concerns

The University provides support to students and staff affected by safeguarding concerns.

Students

Students can access specialist support from the expert teams within the Student Journey:

Counselling Service: provides an inclusive, confidential service supporting students who may be experiencing personal or emotional difficulties, whether that be as a result of safeguarding concerns or other issues. In addition to 1-1 personal counselling sessions, students can participate in group sessions on such issues as confidence building, stress management, self- awareness, mindfulness, and mental health awareness. Counsellors are also able to provide effective referrals to specialist external organisations when appropriate.

The Counselling Service also provide advice, guidance and training for staff across the University on a range of matters.

Disabilities and Dyslexia Service (DDS): offers advice, information and support for students with a disability, a Specific Learning Difficulty (SpLD) such as Dyslexia or Dyspraxia, students who are Deaf or hard of hearing, blind or partially sighted students, students with chronic long-term health conditions and students with mental health difficulties. The Disabilities and Dyslexia Service aims to ensure that all disabled students are supported in order to reduce any barriers presented by their disability and achieve their full academic potential.

In addition, the DDS aims to ensure that all staff working with disabled students, are educated and empowered to fully understand and support the needs of the University's disabled cohort.

Student Money and Accommodation Advice (SMAA) team: provides confidential, face-to-face drop-in sessions and appointments on a range of issues including student funding, personal finance concerns and accommodation advice. The team can make direct referrals for specialist debt advice and has staff members dedicated specifically to care-leavers and estranged students. The team works with a wide range of hall providers and private landlords to ensure students have suitable and safe accommodation, including on-site visits and interventions when appropriate.

International Student Support: The international advice team provide a wide range of guidance and advice to international students and staff. The team can help with immigration issues that may arise as a result of a safeguarding concern including Tier 4 and short-term study visas, family and dependants, and the rules relating to working during and after studies.

The team also provide training, advice and support for staff dealing with student matters.

School Offices: offer advice and support for students who experience challenges, providing advice and guidance relating to academic matters and personal support available at the University.

All services can be accessed via their webpages or through the School Offices

Staff

Staff Support - Support for staff dealing with, or affected by safeguarding issues, is generally offered through their Line Manager. Human Resources and the Employee Assistance Programme. In addition, staff can seek advice from the specialist services listed above and regular training is provided to nominated Safeguarding Officers.

Appendix 1

Examples of safeguarding concerns and definitions.

Causes for concern that would fall under this policy – see definitions below. This list is not exhaustive, and many issues are interlinked and overlapping.

- **Abuse (in many forms and including historical abuse)**
- **Bullying and harassment, including hate crimes**
- **Radicalisation**
- **Violence against women**

The decision to follow the procedures set out in this policy will depend upon several key factors:

- **Allegations must be supported with reference to specific behaviours – what was said or done by the person who is the subject of a report.**
- **The severity of ill-treatment.**
- **The degree and extent of the harm done.**
- **The duration and frequency of abuse and / or neglect.**
- **Whether observed directly or reported indirectly.**

Further Guidance on the types of causes for concern Abuse

Abuse can take many forms and can be loosely defined as cruel and/or violent treatment. It may be a single act or repeated behaviour and it may also be intentional or unintentional. Abuse may also be peer on peer, carried out by children, young people and adults at risk.

Abuse may also be defined as an act of neglect or a failure to act on the part of someone who has caring responsibilities

The following examples would be considered to be abuse. This list is not exhaustive:

Safeguarding Concern	Characteristics
• Physical abuse and violence.	May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm, including by fabricating the symptoms of, or deliberately causing, ill health to another.

• Verbal abuse and insults.	Verbal abuse most commonly includes abusive behaviour such as name calling, put downs and discounting feelings. As well as using words, verbal abuse can include using silence to exert control.
• Sexual violence and abuse.	Acts of physical, psychological and emotional violation in the form of a sexual act, inflicted on someone without their consent. It can involve forcing or manipulating someone to witness or participate in any sexual acts. Sexual violence and abuse is any behaviour of a sexual nature which is unwanted and takes place without consent or understanding. Not all cases of sexual assault involve violence, cause physical injury or leave visible marks. Sexual assault can cause severe distress, emotional harm and injuries which can't be seen – all of which can take a long time to recover from. It can include forcing or enticing a child, young or vulnerable person to take part in sexual activities, whether or not the individual is aware of what is happening. The activities may involve physical contact, including rape or sexual assault or non-penetrative acts. It would also include individuals in looking at, or in the production of, pornographic material, or encouraging children, young or vulnerable individuals to behave in sexually inappropriate ways.

• Emotional and psychological abuse.	Emotional or psychological abuse can be verbal or nonverbal. It is ill-treatment such as to cause severe and persistent adverse effects on an individual's emotional wellbeing and includes verbal abuse such as yelling, name-calling, blaming and shaming or isolation, intimidation, threats of violence and controlling behaviour. It may involve conveying to individuals that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It would also include age or developmentally inappropriate expectations being imposed on children and adults at risk, causing children frequently to feel frightened, or the exploitation or corruption of children or adults at risk.
• Financial exploitation or control of children, adults at risk or as a form of domestic violence.	In relation to children or adults at risk, my include having money or other property stolen, being defrauded, being put under pressure in relation to money or other property, and having money or other property misused. It may also be defined in intimate relationships as a way of controlling a person's ability to acquire, use and maintain their own money and financial resources, particularly in terms of domestic violence.

• Exposing children / adults at risk to inappropriate situations.	Such as drug taking or heavy drinking, and/or inappropriate materials such as pornography, violent films, and cruelty.
• Domestic violence including coercion, financial and emotional abuse.	Domestic abuse, or domestic violence, can be defined as any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality. The abuse can encompass, but is not limited to: ● psychological ● physical ● sexual ● financial ● emotional The definition includes so-called 'honour' based violence, female genital mutilation (FGM) and forced marriage. Victims are not confined to one gender or ethnic group. Family members include mother, father, son, daughter, brother, sister, and grandparents, whether directly related, in laws or stepfamily. **Definitions:** **Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploring their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

	Coercive behaviour is an act or pattern of acts of assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

Forced marriage is a marriage conducted without the valid consent of one or both parties and where duress is a factor. An arranged marriage becomes a safeguarding issue where the person concerned is a child or is an adult who lacks the capacity to provide valid consent. |
• Female Genital Mutilation.	Female Genital Mutilation (FGM) - A collective term for a range of procedures which involve partial or total removal of the external female genitalia for non-medical reasons. It is sometimes referred to as female circumcision, or female genital cutting.
• Honour based violence including forced marriage (see Domestic violence).	**'Honour-based' violence** is a crime or incident which has or may have been committed to protect or defend the honour of the family and / or community.
• Modern slavery and human trafficking.	Modern slavery is the recruitment, movement, harbouring or receiving of children or adults through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

• Neglectful behaviours while performing a care role.	The persistent failure to meet a child, or adults at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a child or adults at risk's basic emotional needs.

Potential signs of abuse - Signs may not always be indicative of abuse and it is advised that those with concerns approach the issue **carefully**, being aware that to make false allegations of abuse may in itself cause harm.

With both children and adults at risk the clearest sign is an actual report or direct statement. Staff receiving such reports will not decide if there is sufficient evidence or if the allegation is 'true' this is the responsibility of either Social Services or the police. Staff must always report such disclosures to the LoSO/LeSO via the online reporting tool.

Other signs are generally either physical, behavioural or both:

- Neglected or under nourished appearance
- A deterioration in appearance and / or mood
- Unexplained bruising
- Unexplained or inappropriate covering up
- A deterioration in social engagement, accompanied by an increase in fearfulness
- Children using sexually explicit language or gestures
- Children using violent gestures or being violent to others

Further details and other examples can be viewed on the [Social Care Institute for Excellence (SCIE) website](#)

Bullying and Harassment

The terms 'bullying' and 'harassment' are often used interchangeably, and bullying may be seen as a form of harassment. Bullying / harassment and discrimination can take place in relation to any individual, who may not necessarily be a child or adult at risk.

For the purposes of this policy and its implementation, the University defines bullying and harassment as behaviour that:

- is not acceptable to the recipient and
- can 'reasonably' be considered to be harassment.

While the motivation of the person doing the harassment may be considered, it is not a deciding factor. The key question is: could the behaviour in question 'reasonably' be considered to be harassing, hostile, intimidating, degrading or humiliating, to the other.

Bullying, harassment and discrimination can take place through 'actively' harmful behaviour (such as name calling) or through passive behaviour (such as intentionally excluding someone). The behaviour is "unwarranted and unwelcome" (Bullying or harassment may be by an individual against an individual (perhaps by someone in a position of authority such as a manager or supervisor) or involve groups of people. It may be obvious or it may be insidious. (ACAS).

Typically, for behaviour to be considered harassment, it must be persistent and continue or develop over a period of time. Nevertheless, a one-off incident which is particularly serious can however, in itself constitute harassment.

Harassment relating to any of the protected characteristics (Equality Act, 2010) is unlawful. The protected characteristics are:

- Age
- Disability (physical or mental)
- Gender reassignment
- Marriage and civil partnership
- Race (including ethnic and national origins, colour and nationality)
- Religion or belief (including lack of belief)
- Sex (including sexual harassment)
- Sexual orientation
- Pregnancy and maternity

Harassment can be verbal, physical or emotional. It can be carried out using letters, emails, social media, text messages and graffiti. It may be expressed directly to the 'recipient', occur in their presence or be communicated about them to a third party. The following are typical examples (not exhaustive):

- Insults, name-calling and offensive language and gestures
- Offensive or demeaning jokes
- Ridiculing and undermining behaviour
- Inappropriate or unnecessary physical contact
- Physical assault or threats of physical assault
- Intimidating, coercive or threatening actions and behaviour
- Unwanted sexual advances
- Isolation, non-cooperation or deliberate exclusion
- Comments about a person's appearance, intrusive questions
- Comments about a person's private life and malicious gossip
- Offensive images and literature
- Pestering, spying, trolling or stalking

Staff members should also reference the University's [Harassment policy](#)

Hate Crimes - Hate crimes are crimes motivated by prejudice, hatred or intolerance that intentionally demean or harm individuals and groups, defined by their actual (or perceived): disability, race, religion, sexual orientation or transgender identity.

They create an environment in which people experience or could reasonably fear, harassment, intimidation or violence.
Hate crimes can include:

- threatening behaviour
- assault
- robbery
- damage to property
- inciting others to commit hate crimes
- harassment

The University will treat Hate Crime as a form of harassment under this Policy.

Radicalisation

Defined in the Prevent duty guidance as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups". More information on can be found in Appendix 3 and on the [Government webpages.](#)

Potential signs of Radicalisation - It is widely acknowledged that radicalised individuals come from a wide range of backgrounds and are often described as "demographically unremarkable" (House of Commons, 2010-12). The caution needs to be emphasised when considering a potential concern about radicalisation, as many signs of radicalisation can equally well be brought about by other life circumstances:
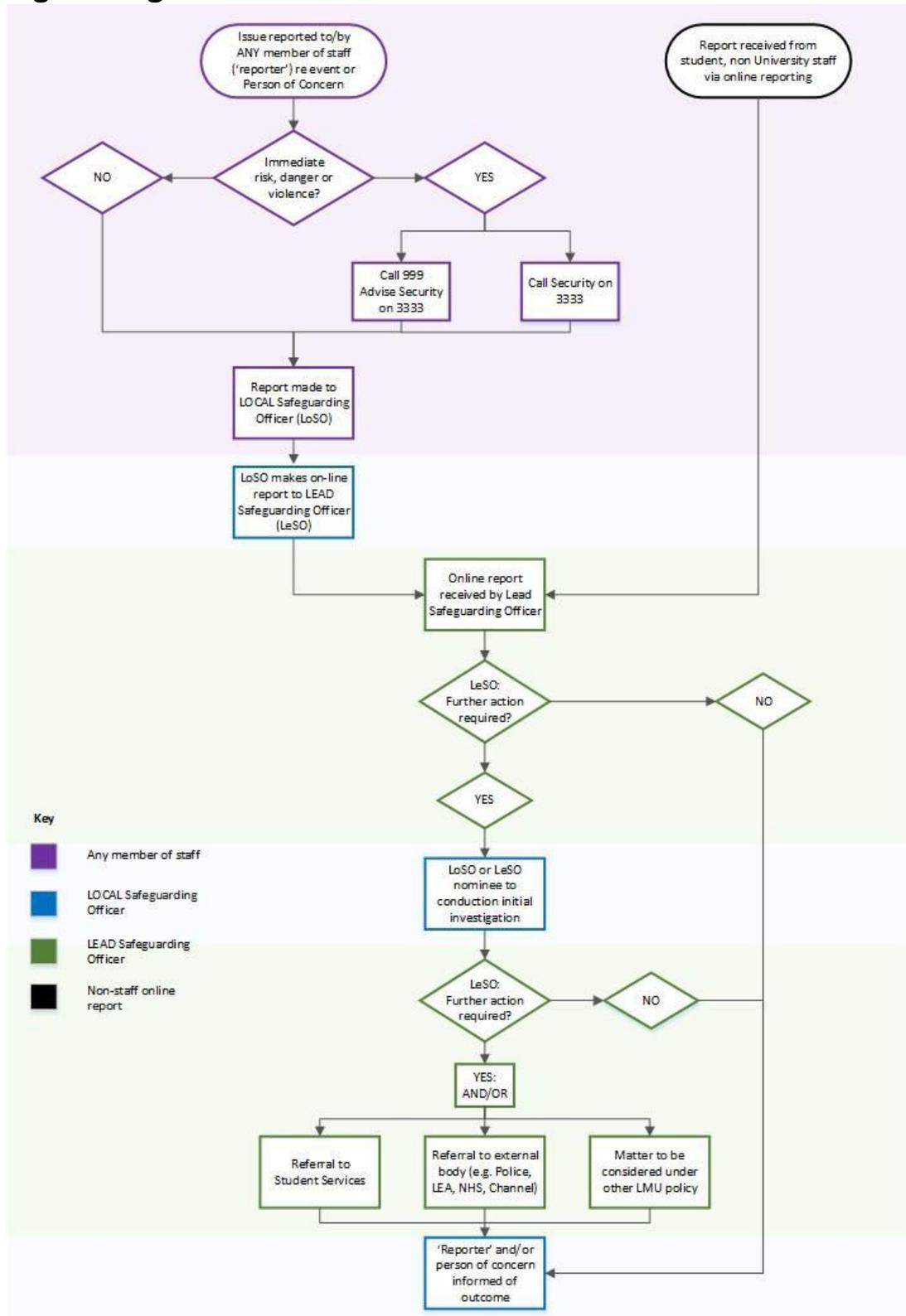
- Notable changes in behaviour and mood
- Expressed support for violence and terrorism or increasingly sympathetic views to terrorist acts
- Expression of extreme political or radical views
- Change of appearance
- Dramatic change of friends
- Spending excessive time alone
- Possession of violent extremist literature
- Attempts to access or contribute to violent extremist websites
- Possession of material regarding weapons and/or explosives
- Possession of literature regarding military training, skills and techniques.
- Claims of involvement in organisations Espousing violent extremist ideology
- Claims of attendance at training camps
- Claims of involvement in combat or violent activity on behalf of violent extremist groups

Violence Against Women -

The United Nations defines violence against women as: "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life" (General Assembly Resolution 48/104; Declaration on the Elimination of Violence against Women, 1993

Appendix 2

Safeguarding Procedure in detail

Key
- Any member of staff
- LOCAL Safeguarding Officer
- LEAD Safeguarding Officer
- Non-staff online report

Issue reported to/by ANY member of staff ('reporter') re event or Person of Concern

Report received from student, non University staff via online reporting

Immediate risk, danger or violence?
- NO
- YES

Call 999 Advise Security on 3333

Call Security on 3333

Report made to LOCAL Safeguarding Officer (LoSO)

LoSO makes on-line report to LEAD Safeguarding Officer (LeSO)

Online report received by Lead Safeguarding Officer

LeSO: Further action required?
- NO
- YES

LoSO or LeSO nominee to conduction initial investigation

LeSO: Further action required?
- NO
- YES: AND/OR

Referral to Student Services

Referral to external body (e.g. Police, LEA, NHS, Channel)

Matter to be considered under other LMU policy

'Reporter' and/or person of concern informed of outcome

Once a concern has been reported to them, the LoSO will liaise with the LeSO who will make an initial determination whether it is an emergency or if urgent action is required. Reports may also be received directly via the on-line report a concern form located on the [Safeguarding webpages.](#)

If urgent action is required the LeSO, or nominate, will: contact the police and inform the University Secretary's Office and Security.

If the situation is not urgent but requires further action, then the LeSO may request the LoSO or nominated staff member to, initiate an initial assessment of the concern if appropriate so that the LeSO can decide on the best way to respond to the concern. The purpose of the initial assessment is not to arrive at a definite answer nor is it about determining whether someone is being harmed. It is to clarify if there are sufficient grounds to take further action.

The initial assessment may involve a conversation with the person making the report or whom it suspected that they may be experiencing behaviour as covered by this policy. Such conversations must be handled sensitively and are often challenging.

The staff member undertaking the initial assessment should consider the following guidance and may also find it helpful to speak first with a counsellor in the University Counselling Service.

The staff member should:

- Listen carefully and respond sensitively without expressing an opinion and without imposing their views and values.
- Consider very carefully before asking direct and/or invasive questions. These may prevent the person from telling the full story and may also trigger trauma symptoms.
- Encourage, giving lots of time and not pressurising responses.
- Be aware that, for various reasons, disclosure of such information can be difficult: the person may be low in self-confidence; they may have poor communication skills; they may not expect to be believed; there may be a background of threat or coercion; there may be 'secondary gains' such as presents, power or attention; they may be protecting others, including an abuser/radicaliser or other potential victims; the experience may have become a normal reality.
- Stay calm and keep listening, without expressing whatever shock, disgust or alarm they may personally feel.
- Be honest about confidentiality (see below) and the requirement to share information to relevant parities. Reassure the person that the University will try to keep the reporting individual involved in the decision-making process where possible, however they should also be aware that in some circumstances this will not be the case.

- Under no circumstances should the staff member contact or confront the alleged abuser/radicaliser, even if they are known to them or are a student / staff member of the university.

Impartiality and self-care

It is recognised that dealing with these situations and listening to personal accounts can be frightening, distressing and potentially triggering for the listener. It is also important to note that these heightened reactions have the capacity to impair judgement. As a consequence, staff who are vulnerable to the issues under investigation, should not be involved in the investigation and reporting process.

For many staff, even those not triggered by these incidents, a debriefing session may be advisable and essential. Staff are advised that this is good practice and should not be viewed as a source of shame or an indication of weakness or failure.

Should a debriefing take place, it is important to do so without reference to identifying details of staff or students involved. In some circumstances, staff may also wish to speak in confidence with a counsellor through the [Employee Assistance Programme.](#)

Record keeping

A record of the concern and the initial assessment and decision should be made by the LeSO and LoSO as appropriate and should include:

- Appropriate personal details of the child, adults at risk, staff member or student (such as name; age; address; ID number. If appropriate; telephone number; email address)
- The nature of the concern; what has been disclosed, using quotations where possible and being careful to be objective and factual. The record may refer to any signs of abuse or violence
- The source(s) of information about the concern
- Details of witnesses (where appropriate)
- Any advice given to the child / adults at risk / staff member / student
- What has been discussed with the child / adults at risk / staff member / student about confidentiality
- Names of staff with whom the incident or concern has been discussed
- Details of the action taken or any referrals made (internal and external)
- Date of the decision

This is information must be kept confidentiality and only shared with the appropriate staff.

Confidentiality

Safeguarding issues present major challenges to confidentiality. If individuals reporting concerns fear that information will be passed on to others, they may be less likely to disclose. The same issue may exist for someone who is seeking help with their violent, abusive or potentially extremist or terrorist behaviour or thinking.

Staff cannot give an assurance of confidentiality. Confidentiality is necessarily limited by the law and by some university policies.

Where appropriate staff should normally inform the person making the disclosure that the information will be passed on to the relevant Lead Safeguarding Officer, who may then have to pass this to the police or Social Services.

The need to break confidentiality is rare but it most certainly applies in relation to some safeguarding issues. These may include but are not limited to:

- where the welfare of a child or adults at risk is at risk
- where a student is at risk of being drawn into terrorism or ideologies that support terrorism.
- discussions where an intention to harm oneself or someone else are expressed
- discussions where involvement in; or intention to become involved in; terrorism, or support for terrorism or extremist ideologies is expressed.

When it is considered necessary to break confidentiality, staff are advised to first discuss the issues with a senior colleague (if possible) and to do so on what is called a 'need to know' basis only. Where possible and safe, the need to break confidentiality should be discussed with the person making a disclosure.

There may be exceptional circumstances where it is not possible to inform the person making the disclosure that the information will be passed on: e.g. if this would be likely to impede the investigation of a crime or the arrest of an offender, or put the safety of others at risk – this should be discussed immediately with the LeSO if possible.

Consideration and decision making

When considering safeguarding concerns (relating to a child, adults at risk, an individual at risk of radicalisation, violence against women, harassment or hate crime) the LoSO and LeSO should consider the evidence that is giving rise to the concern and assess how objective it is, e.g. is it a gut instinct, is it based on observation or on an explicit report.

Having considered the concern and any relevant evidence, the LeSO shall determine what further steps to take, which may include:

- Referring the person concerned to relevant support services, such as to the Counselling Service or the Disabilities & Dyslexia Service (DDS); and/or
- Referring the matter to be considered under another University policy or procedure; and/or
- Reporting the matter to an external body, such as the police or the local authority.

Further guidance on actions to be taken in relation to specific concerns is set out below.

If appropriate, the Local Safeguarding Officer will report back to the person raising the concern updating them on progress and on the final outcome. However, this may not be possible if to do so would be in conflict with other University procedures, policies or GDPR requirements.

If appropriate, the person raising the concerns should be advised about appropriate support procedures which are in place either internal or external to the University.

Actions in relation to specific concerns

Concerns raised that a child (under 18) may be at risk:

- The University has an obligation to report this to the Children and Young People's Service within the Local Authority (or appropriate agencies including the police).
- The Lead Safeguarding Officer will communicate with those involved in order to gather information and to relay this to the appropriate agencies.

Concerns raised regarding an 'adult at risk':

In so far as possible, the LeSO will involve the adult at risk in the decision-making process, particularly if the adult at risk is a student of the University

The LeSO/LoSO will inform the adult at risk about:

    a. the support available within the University and outside the University;
    b. other services which they can access.

If necessary, the LeSO will make a direct report to the Local Authority (or appropriate agency) without the adults at risk's consent. In some cases, the LeSO will make an internal referral, e.g. to the Counselling Service or the Disabilities & Dyslexia Service (DDS)

Concerns raised regarding risk of possible radicalisation:

- In some cases, the LSO will make an internal referral, e.g. to the Counselling Service or the Disabilities & Dyslexia Service (DDS).
- The LeSO may seek advice from a relevant Prevent co-ordinator or the police.
- If the LeSO believes that a referral to Channel may be appropriate, the matter shall be passed to the Channel Referral Panel (see Appendix 3) for a decision.

Concerns raised regarding violence against women, harassment or hate crime:

The LeSO will endeavour to involve the affected student in the decision-making process and will not pursue any action which is against the student's wishes.

The affected student will be informed of the support available to them within the university and externally (if relevant). This could include: the Counselling Service, the Disabilities & Dyslexia Service (DDS); Student Money and Accommodation Advice (SMAA); the police.

The LeSO will consider if it is appropriate to encourage an informal resolution. In deciding about appropriateness, consideration should be given to the nature of the allegations and their severity.

The affected student will be advised of the actions which they can take under the law and will be advised to report the incident(s) to the police. In most cases, the university is not responsible for such reporting.

The LeSO may seek advice from the police.

If appropriate, the LeSO may initiate procedures under the University's Disciplinary Procedure.

Students on placement and in partner institutions

Concerns relating to students undertaking University-accredited placements should be reported in the usual manner. These may include concerns about matters affecting the student (e.g. radicalisation, abuse, harassment, sexual misconduct, violence) or about the behaviour of the student towards others (e.g. abuse of children or adults at risk, harassment of others, hate crime).

While concerns are investigated by the University, the University Secretary may suspend a placement and remove a student from the placement environment as a precaution to protect the student or individuals in the placement environment. The University shall seek to co-ordinate as far as possible with any investigation undertaken by the placement provider.

Partner institutions are expected to investigate concerns relating to partnership students and to have appropriate policies for ensuring the safeguarding of partnership students, subject to the agreement between the partner and the University.

Concerns about the behaviour of a member of staff

The University takes all possible measures to recruit staff safely. Despite this, there may be occasions when allegations regarding safeguarding issues are raised about another member of staff. University employees understand that their first priority is to those in their care and not to their colleagues. Staff should be reassured that the University is committed to supporting staff who, in good faith, report concerns about staff and risk.

The concern should be reported to the relevant LeSO, who will initiate an investigation and take appropriate action to ensure safety for those who may be at risk.

The LeSO will also ensure that Human Resources are informed about the allegation and that University procedures are followed.

In matters of abuse of a child / adults at risk and where there is any doubt or uncertainty, the LeSO should contact the Local Authority Designated Officer in the first instance. They will then take the referral and advise on appropriate action, or discuss the allegation or concern to determine if there is cause for concern and a need for further action. To ensure that all parties (including the member of staff about whom the report has been made) are protected, the allegation of abuse should be discussed with the Local Authority Designated Officer prior to taking any further action such as taking statements.

In matters relating to radicalisation, the LeSO may seek advice from a relevant Prevent co-ordinator or the police.

Usually, the University does not concern itself with the private lives of staff members. However, the University has a duty to act where safeguarding concerns are reported that may require referral to an external agency or the police.

External Reporting - Under the provisions of the policy, the University is required to report instances of misconduct relating to children and adults at risk, radicalisation,

hate crime, violence against women and sexual misconduct. Depending on the conduct in question, this report may be to: (a) the Police, (b) the Disclosure and Barring Service (DBS), (c) any relevant professional associations. This would generally apply when the member of staff has been asked to leave the university or a student has been permanently suspended for reasons of misconduct or unsuitability to work with children or adults at risk.

In the case of a staff member, the reporting will be done by the Director of Human Resources (or someone acting on their behalf). In the case of students, the reporting will be done by the Head of the appropriate School. These members of staff will liaise with the Lead Safeguarding Officer and be responsible for any further contact with, and reporting to, the external body.

Appendix 3

Prevent Duty

The UK government's anti-terrorism strategy, named 'Contest', consists of four work- streams, known as the 'four P's': Prevent, Pursue, Protect, and Prepare.

Prevent	Pursue	Protect	Prepare
Aim: To "prevent people from becoming terrorists or supporting terrorism. That will also require challenge to extremist ideologies which can be made to justify terrorism and intervention with some extremists who are moving into terrorism." (Prevent: 6.7)	Aim: "To stop terrorist attacks by detecting, prosecuting and otherwise disrupting those who plot to carry out attacks against the UK or its interests overseas."	Aim: "To strengthen protection against a terrorist attack in the UK or against its interests overseas and so reduce their vulnerability. The work focuses on border security, the transport system, national infrastructure and public places."	Aim: "To mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase the UK's resilience so we can recover from its aftermath."

The evidence available suggests that there are four roots to the terrorist threat:
(a) Ideology, (b) Theology, (c) Grievance and (d) Mental health problems. The objectives of 'Prevent' are related to these roots:

- Responding to the ideological challenge of terrorism and the threat faced from those who promote it. Looking at ways of challenging and counteracting messages of hate and negativity.
- Using a safeguarding approach to help those who are at risk from becoming radicalised. Preventing people from being drawn into terrorism and ensuring they are given appropriate advice and support
- Working with a wide range of sectors and institutions (including education, faith, health and criminal justice) where there are risks of radicalisation which need to be addressed.

The Prevent team works closely with communities and partner agencies such as Local Authorities, Education and Health, to safeguard vulnerable individuals who are at risk from potential radicalisation. The Prevent team may become involved where there are concerns about potential radicalisation within the university.

While it is difficult to generalise, it appears that in the UK, radicalisation of various kinds tends to occur: (a) among young people, under the age of 30 and (b) mainly male, (c) mainly poorly educated, although there are cases involving people with a high level of education, (d) mainly unemployed and (e) in some cases those who have already been involved in crime. There is a variety of reasons why people are attracted to extremist and terrorist activity. Among these factors are the following:

- A perception / experience of discrimination
- Experience of racial or religious harassment
- Negative views of policing
- Lack of trust in democratic government
- A perception that specific communities are being unfairly treated
- An aspiration to defend specific communities when they are perceived to be under attack or unjustly treated
- A perception of biased media coverage
- UK foreign policy, notably with regard to Muslim countries
- Personality-driven factors
- Family or local allegiances
- A sense of belonging and purpose, with like-minded people
- The promise of status, excitement and in some cases financial reward
- Socio- economic factors, e.g. communities with significant terrorist activity generally score highest on a range of social deprivation indicators.
- Supremacist ideology, which sanctions the use of extreme violence as a response to perceived social injustice and dysfunction.
- A perception that a specific identity is under threat from social change
- Rhetoric and language of apparently non-violent extremist groups
- Peer pressure
- Prospect of personal benefit

Supporting those at risk of being drawn into terrorism is often about diverting people away from potential harm at an early stage. The UK's 'Prevent' counter-terrorism strategy is focused on providing practical help to stop people from being drawn into terrorism. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. People who are found to be at risk of radicalisation are then offered support through the 'Channel' process, which involves several agencies working together to give individuals access to services such as health, education, specialist mentoring and diversionary activities.

Through the Channel process, the nature and extent of the vulnerability or risk is assessed and an appropriate support package; consisting of specific services is tailored to an individual's needs.

'Channel' is not about reporting or informing on individuals in order to prosecute them. It is about communities working together to support vulnerable people at an early stage, preventing them from being drawn into terrorism. Channel is based on the premise that people being drawn into radicalisation and recruitment can be identified and then provided with appropriate support, which may dissuade them from engaging in terrorist-related activity. This support is sometimes described as 'de-radicalisation'. Participation in the programme is voluntary.

Reasons for referral can include any of the following high risk indicators: (a) expressed support for violence and terrorism; (b) possession of violent extremist literature; (c) attempts to access or contribute to violent extremist websites; (d) possession of material regarding weapons and/or explosives and (e) possession of literature regarding military training, skills and techniques. Account should also be taken of the following lower indicators: (a) claims of involvement in organisations; (b) espousing violent extremist ideology; (c) claims of attendance at training camps and claims of involvement in combat or violent activity on behalf of violent extremist groups.

The University will establish a Channel Referral Panel consisting of the Lead Safeguarding Officer responsible for Prevent/radicalisation and two other members appointed by the Vice-Chancellor. The Referral Panel will consider cases where a referral to Channel is recommended and will determine whether a referral should occur. The Referral Panel may seek external advice (e.g. from a Prevent co-ordinator).

Where a referral is made, the referral will normally be made to the relevant local authority Channel panel, which will determine whether support through the Channel programme is appropriate. If so, the individual referred will be informed at that stage and offered support by the local authority Channel panel.

Appendix 4

Definition of terms

Adult at risk: for the purposes of this policy is defined as an adult who is over 18 and:

- has needs for care and support,
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Child: For the purpose of this Policy, the term 'child' or 'young person' applies to a person who is less than 18 years of age

Prevent – "The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting 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" (Prevent duty guidance).

Prevent Duty – The duty imposed on universities and other public authorities by the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. It also includes the duty to have regard to statutory guidance published for all public authorities, and guidance specifically aimed at universities, on this duty (the 'Prevent duty guidance'). Separate non-statutory guidance has been issued by HEFCE, which is responsible for monitoring the higher education sector's compliance with the Prevent duty.

Terrorism: The current UK definition of terrorism is given in the Terrorism Act 2000. This defines terrorism as an action that endangers or causes serious 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. The terrorist 'action' can be that of individuals acting alone or as part of organised or well-trained groups. Four domains are identified: (a) International terrorism, (b) Northern Ireland related terrorism, (c) Extreme Right-Wing terrorism and (d) other forms of both secular and religious terrorism (Prevent: Section 5). The Terrorism Act 2006 created a number of 'offences related to terrorism', including encouraging terrorism, glorifying terrorism, disseminating terrorist publications, training for terrorism and preparing terrorist acts.

Victimisation: is defined by the Equality Act as: Treating someone badly because they have done a 'protected act' (or because you believe that a person has done or is going to do a protected act).

A 'protected act' is:

- Making a claim or complaint of discrimination (under the Equality Act).
- Helping someone else to make a claim by giving evidence or information.
- Making an allegation that you or someone else has breached the Act.
- Doing anything else in connection with the Act.

If an individual gives false evidence or makes an allegation in bad faith, then they are not protected from victimisation under the Act. Victimisation may include labelling an individual a 'troublemaker' and/or refusing to advance him/her academically or professionally, refusal to provide a reference once the working or learning relationship has ended, or to treating them in any way less favourably as a result of their actions.