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| Version number: | 5.2 |  |
| Policy owner: | Lead Safeguarding Officer |
| Effective date: | 30/09/2021 |
| Review date: | 31/07/2023 |



**Safeguarding and Prevent Duty Policy**

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| The Policy has been reviewed and supersedes all previous issues. It has undergone the following approval process: | | |
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| Equality Analysis | | 9 Aug 2018 |
|  | |  |
| Vice-Chancellor’s Group | | 20 August 2019 |
|  | |  |
| Learning, Teaching and Student Experience Committee | | 07 October 2021 |
|  | |  |
| Academic Board | | 27 October 2021 |
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|  | |  |
| The Policy was last issued on 20 April 2021 The principal changes relate to: | | |
| Section/Paragraph | Title | Change: |
| Throughout |  | Correction of Director of Students, Support and Information Services title |
| 3 | Associated policies and procedures | Added applicability to all aspects of University’s activities and underpin many policies - list is only of particular relevance; removal of privacy standards |
| 5.c.  5.h  5.j | Safeguarding preventative measures | Added reference to relationship agreement with the SU.  IT services managed via industry-standard tools.  Contractors selected in accordance with the Financial Regulations |
| 6.2 | Under 18s - Duty of Care and Safeguarding | Footnote referencing Children Act 1989 for definition of child. |
| 6.9 | Under age drinking | Clarification of first bullet point - not in licenced venues |
| Appendix F | Safeguarding and Prevent officers and Out of Hours Contacts | Updated in accordance with current appointed staff. |
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# Background and scope

Safeguarding is defined as “protecting people’s health, wellbeing and human rights, and enabling them and others to live free from harm, abuse and neglect”[[1]](#footnote-2). These measures are in addition to those required under general Health and Safety requirements.

Prevent duty is 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. The government has issued statutory guidance for all public authorities, and guidance specifically aimed at universities, on this duty (the ‘Prevent Duty Guidance: for higher education institutions in England and Wales’; updated March 2016).

This policy has been written to guide the University in its statutory and moral obligation to protect vulnerable adults and children from harm, abuse, neglect, exploitation, discrimination or radicalisation.

The policy is intended to provide a framework for safeguarding within which other more specific policies and procedures (listed in section 3 below) will sit. It covers issues relating to students (including all registered undergraduate, postgraduate and apprenticeships as well as international short-term students and trainees - see Section 2 Definitions), staff and the general public and takes as its starting point the facts that:

1. The University offers a range of programmes and activities some of which will require consideration to be given to ‘vulnerable’ adults and children.
2. The University recognises the fact that students may be under 18 or a ‘vulnerable’ adult at the commencement of their programme, or may become ‘vulnerable’ during the course of their studies.
3. The University offers services (eg Student Support and Wellbeing), facilities (eg Residential Halls, Otters Restaurant, sports facilities, Sport Performance and Rehabilitation Unit (SPRU)) and programmes (particularly those with a placement component), which may bring our students and staff into contact with vulnerable adults and children.
4. The University is required to be compliant with the legal duties placed on it by the Safeguarding Vulnerable Groups Act 2006 (as amended) and the Counter-Terrorism and Security Act 2015. These include taking all reasonable measures to ensure that risks of harm to vulnerable adults or children are minimised, including the risks to vulnerable adults and children coming onto campus, risks to vulnerable students and children as a result of University activities and placements off campus, and risks of students being drawn into terrorism and the extremist ideologies which are conducive to terrorism.

The policy applies to activities which take place:

* on University premises
* during off-site placements
* off-site and for which the University is responsible
* off-site that may impact upon University staff and students
* on-line from University premises (via University provided networks / Wi-Fi) or via remote access to University systems

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

The Policy covers both the preventative measures which the University has, or should have, in place, and guidelines on responding to specific events, concerns or allegations.

# Definitions

For the purposes of this policy:

* **Student**: the term ‘student’ throughout this document is used as a generic term to cover all registered undergraduate and postgraduate students as well as all apprenticeships and International Short Programme students and trainees.
* **Child** or **young person** applies to a person who is less than 18 years of age.
* **Vulnerable adult**: includes those who, because of mental health difficulties and/or physical health conditions and/or personal circumstances, may be vulnerable to abuse, exploitation or significant harm.  
    
  Students may arrive with vulnerability issues, or these may develop during their time of study at the University. Vulnerability may be long term - for example long term mental or physical conditions, disability, personal circumstances such as history of care and / or abuse - or short term - for example due to bereavement, an accident resulting in serious physical and / or mental illness, extreme stress due to financial or academic failure, or as a result of regular alcohol and / or drugs abuse. In some cases, vulnerability may be very short term for example as a result of individual incidents of alcohol consumption.
* **Adult at risk**: a person aged 18 years or older, 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 him or herself, or unable to protect him or herself against significant harm or exploitation.
* **Radicalisation**: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

A vulnerable student or staff member may be more susceptible to being drawn towards or being targeted by those engaged with an extremist ideology (see [Appendix C](#_Appendix_C:_Potential)).

Further relevant safeguarding and prevent-orientated definitions can be found in [Appendices A](#_Appendix_A:_Definition) and [B](#_Appendix_B:_Definition).

# Associated policies and procedures

Safeguarding and the Prevent Duty are applicable to all aspects of the University’s activities and underpin many of the Policies. The following Policies are of particular relevance to the implementation of the Safeguarding and Prevent Duty Policy:

* Disclosure and Barring Service Guidance (DBS formerly CRB)
* Public Interest Disclosure Policy
* Admissions Policy
* Health and Safety Policy
* Sexual Assault and Misconduct Policy
* Professional Suitability and Fitness to Practise
* Fitness to Study Policy
* Electronic Information Security Policy
* Self-Harm Policy
* Eating Disorder Policy
* Positive Mental Health Policy
* Alcohol and Drugs Policy
* Equality and Diversity Policy
* Policy for Addressing Bullying and Harassment of Students
* Dignity at Work and Anti-Bullying and Harassment Policy
* Policy on the Recruitment and Employment of Ex-Offenders
* Missing Student Policy
* External Speaker or Performance / Event Policy
* Freedom of Speech Code of Conduct / Academic Freedom and Freedom of Speech Statement

# Responsibilities

The University has nominated staff to assume responsibility for safeguarding (see Appendix F), including the following roles:

1. Lead Safeguarding Officer (LSO) - has overall responsibility for the strategic and operational implementation of the policy and guidelines. In addition, the LSO is responsible for:
   1. Ensuring that the Policy is monitored and reviewed in accordance with changes in related legislation and guidance;
   2. Acting as the main contact within the University for the protection of vulnerable students / adults and children;
   3. Ensuring that appropriate University staff are provided with information, advice and training on the protection of vulnerable students / adults and children;
   4. Establishing and maintaining contacts with the local Children’s Services departments, Adult Social Care and Police;
   5. Maintaining confidential records of reported cases and action taken.

This role is held by the Director of Students, Support and Information Services.

1. Department Safeguarding and Prevent Lead (DSPL) - Each Academic Department and Professional Service has a lead responsible for providing immediate support and for liaising with the Lead Safeguarding Officer. It is usual for the Head of Department to be the DSPL. All nominated Academic and Professional Services leads will be given timely and appropriate Safeguarding and Prevent Duty training including the factors that make students vulnerable to radicalisation (‘Prevent awareness training’).
2. Prevent Lead (and Prevent Strategy Group Chair) - has overall responsibility for delivering the outcomes expected from the Prevent Duty. This role is held by the Director of Students, Support and Information Services.
3. Deputy Prevent Lead - this role is held by the Deputy Vice-Chancellor.
4. Deputy Lead Safeguarding Officer (DLSO) – this role is held by the Deputy Vice-Chancellor (Student Experience).

The policy and its implementation is overseen by the Lead Safeguarding Officer in partnership with the Prevent Strategy Group. The group monitors the implementation of the policy and keeps the policy and guidelines under review, ensuring that new guidance is disseminated and incorporated as required, eg in line with legal requirements and good practice guidelines.

**Professional Department Safeguarding and Prevent Lead (PDSPL)**

**Academic Department Safeguarding and Prevent Lead   
(ADSPL**)

**Lead Safeguarding Officer   
(LSO)**

**Prevent Strategy Group   
(PSG)**

All University services dealing with sensitive information about students are compliant with current data protection legislation (including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)). All such University services have a policy and guidelines on confidentiality relating to how they deliver their services, and these are available to students (also see section 11. Confidentiality). Such policies and guidelines are consistent with this Safeguarding and Prevent Duty Policy and with the University’s [Privacy Standard](https://www.chi.ac.uk/about-us/policies-and-statements/data-protection)[.](https://intranet.londonmet.ac.uk/uso/compliance/dp/dp_home.cfm)

Programme Placement Coordinators (for programmes which have a compulsory placement component) will ensure that appropriate procedures are in place for students on placement. These will be consistent with this Safeguarding and Prevent Duty Policy and be accompanied by programme-specific guidelines.

The University engages in a wide range of Access and Outreach (previously Widening Participation) activities. As part of this, University staff will go into local schools and academies. Separate guidance has been produced in relation to these activities and is available from the Widening Participation team.

# Safeguarding preventative measures

The University takes seriously its obligations to protect vulnerable adults and children, and to take appropriate steps to prevent students from being drawn into unsafe practices including terrorism. It therefore has in place a wide range of preventative measures to support all aspects of safeguarding, including the following:

1. **Staff recruitment**: Recruitment procedures are in place which screen people for suitability for working with vulnerable adults and children. At a staffing level this includes advertising relevant posts with a Disclosure and Barring Service (DBS) requirement, asking safeguarding questions at application and interview, and always following up references of successful candidates.

On occasions the University employs students to work within the University. Where the role involves contact with vulnerable adults and / or children, the same scaled and proportionate recruitment requirements as for staff should be in place.

1. **Guidance and support for staff:** Advice for staff in regard to safeguarding as it relates to employment law is available through the Human Resources team.
2. **Recruitment by the Students’ Union of staff (including students as staff):** The Students’ Union is a separate legal entity and a registered charity. Staff recruitment and any relevant DBS checks are covered by SU policies and procedures (please see the Relationship Agreement with the Students’ Union), but are expected to match the robustness used by the University for the employment of staff and students as staff.
3. **Student recruitment (onto programmes)**: All 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, PE and Sports Coaching and Early Childhood, are required to obtain a satisfactory enhanced disclosure from the DBS or Disclosure Scotland. The DBS process for students is overseen by Admissions.
4. **Guidance and support for students:** Advice, guidance and support to students is available through the services offered by the SIZ, Student Support and Wellbeing (Wellbeing Services, Student Health Service, Disability and Dyslexia Service, Student Money Advice Service and International Student Advisory Service), Accommodation, the Chaplaincy and the Skills Team (including the Academic Skills Adviser). The University also provides a named student adviser for care leavers.
5. **Students at risk:** Student Support and Wellbeing together with Accommodation, Security and the SU have in place procedures and guidelines for identifying and supporting students at risk of harm to themselves or to others. STARnet (Students At Risk network) is a mechanism to support such students.
6. **Freedom of speech:** the University has a Freedom of Speech Code of Conduct which is intended to protect the unique freedom of speech existing in academic institutions, and to ensure compliance with legal requirements, including the Prevent duty guidance and the duty to ensure freedom of speech within the law for students, staff and visiting speakers using the University’s premises. This is supported by the External Speaker or Performance/Event Policy.
7. **Monitoring IT and telephony systems:** Under the University’s Electronic Information Security Policy (section 6.3), access to internet sites using the University’s IT services (including those accessed from off-campus) is managed via industry-standard tools. Accessing certain classifications of internet sites or making calls to certain types of telephony services is prohibited (copyright infringement, threat of violence, known sources of extremism etc). All attempts to access these types of sites or services are logged and can be evaluated for safeguarding and / or investigation.
8. **Awareness and training:** The University will ensure that all staff are aware of their freedoms, 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.
9. **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 Financial Regulations.

# Under 18s

## Involvement of under 18s with the University

Children and young people under the age of 18 may be involved with the University in a number of ways including:

* Students joining the University before their 18th birthday
* Prospective students visiting the opening the University (eg open days)
* Visiting the University as part of a school or college University familiarisation or widening participation ‘event’
* Attending a ‘summer school’ (sometimes including staying in Halls of Residence)
* Beneficiaries of sports, music, theatre or dance initiatives
* Working for the University on work experience programmes or as a paid employee
* Simply visiting the University campus as a visitor with another adult.

## Duty of Care and Safeguarding

The University has a duty of care towards all its students and staff. In the case of students joining the University before their 18th birthday this duty is enhanced as such students are regarded as children under English law[[2]](#footnote-3). The University has therefore considered the special measures that need to be taken to ensure that it discharges properly its enhanced duty of care in respect of students under 18. The consequences, both legal and practical, of this are as follows:

* The University will have special duties of care towards a child and cannot assume that a student under the age of 18 can be treated as an adult or make her/his own decisions.
* A person under the age of 18 does not have full legal capacity to enter into contracts, to give valid consent or to hold office in student clubs or societies.
* Before the student engages in certain activities consent of the responsible person should be sought. This should be the parents or carers of the student.
* Special measures may need to be taken in respect of certain sporting or social activities.
* The student may not purchase alcohol or drink alcohol on University premises.
* Staff in a position of responsibility for or a relationship of trust with the student will need to be made aware of relevant legal issues.
* Appropriate residential arrangements will have to be made.

It also means that everyone should be clear about responsibilities including:

* The parents or carers of students of the University who are under 18 years of age.
* The parents or carers of children who come onto the University’s campuses as visitors (including the children of staff or students).
* Third parties who may use University facilities for under 18s such as Summer Schools.

The responsibility for safeguarding rests with all those who come into contact with children and families in their everyday work. Safeguarding within the University context includes:

* Ensuring a safe and secure environment.
* Enabling parents/carers to have confidence in the institution's care for under 18-year-olds.
* Ensuring a quick and appropriate response to any child suffering from or who has suffered from significant harm as a consequence of their interaction with the University.
* Preventing anyone who is unsuitable to work with children from doing so.
* Working cooperatively with other agencies that provide services for children.

It should be noted that whilst universities are not included specifically in some elements of the existing legislation, courts may use guidance issued within the secondary and further education sectors as an indication of good practice to assess whether there has been a breach of the duty of care to children by universities.

## Safeguarding measures for the under 18s

The University does not accept an *in loco parentis* responsibility for children; however, it is committed to practice that protects children, young people and vulnerable adults from harm and that helps ensure that members of its community who work directly with children or young people are not placed in situations where abuse might be alleged.

The University seeks to take every reasonable step to safeguard children by:

* Identifying a Lead Safeguarding Officer (Director of Students, Support and Information Services) and trained department heads as safeguarding and prevent leads (see section 4. Responsibilities).
* Adopting safeguarding preventative measures (see section 5. Safeguarding preventative measures) which includes vetting and training people who work directly with children and young people.
* Adopting and publicising safeguarding guidelines (see section 6.3 below).
* Ensuring that the University’s Admissions Policy has clear procedures for the admission of any person under 18 (see section 6.6 below).
* Ensuring Academic Departments are aware of their additional responsibilities towards students who are under 18.
* Putting in place appropriate procedures and guidelines for students under 18 accommodated in halls or University managed properties, or on campus through third-party use of University facilities (see section 6.8 below).
* Ensuring that any student under 18 can be identified and prevented from buying alcohol on campus.
* Reviewing and publicising the University’s regulations governing student discipline and its expectations of the behaviour of all students.
* Ensuring that all relevant staff are informed which students are under 18 to enable them to abide by the set guidelines.

Where University facilities are used by a third party for Under 18s, such as for Summer Schools, the University will ensure that organisers are clear about their responsibilities for safeguarding children in their care. A risk issues checklist for summer school deliverers can be found in Appendix I: Risk Issues Checklist for Summer Schools.

Where children of students, staff members or visitors are present on the University campus, they remain the responsibility of their parent(s)/carer(s), unless they have been placed in a childcare, play-scheme or similar facility.

## Sports coaching involving the under 18s

The Institute of Sport is involved in organising and delivering coach education courses to its own students and to the wider community, including offering sports coaching and other events to children. All sports staff and students who will come into regular contact with children will be DBS checked. Members of staff and students who are delivering sports programmes to children attend sports specific safeguarding training or University managed safeguarding training.

## Guidelines for University staff and students working with children

1. In appropriate cases and in accordance with the law, the University reserves the right to report to the appropriate authorities any concerns it has that a University member of staff (or former University member) or student ought to be included in any list of people who should be restricted from working with children.
2. Situations where there is only one staff member present with a child should be avoided. On the occasions when a confidential interview or one to one meeting is necessary, these should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open.
3. Unaccompanied journeys with a child should be avoided; official modes of transport should always be used and appropriate parental consent should have been received. Where children are being transported on behalf of the University they should be accompanied by a parent, guardian, chaperone or teacher.
4. Meetings with any student under the age of 18 outside the normal teaching environment/ institution should be avoided. Where such meetings cannot be avoided, inform another staff member that they are taking place.
5. Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which may constitute a criminal offence (see the University’s Policy on Consensual relationships).
6. In situations where young students may be providing information of a particularly sensitive nature, for example to staff with pastoral responsibility, staff should be careful not to probe for details which could be construed as unjustified intrusion.
7. Unnecessary physical contact with young people/children should be avoided, for example, gestures such as regularly putting a hand on the shoulder or arm. Whilst these gestures may be well intentioned, such acts could be misinterpreted.
8. In situations where it is necessary for staff to restrain a young person/child in order to prevent self-injury, injury to others or damage to property, only the minimum force necessary must be used and any action taken must be only to restrain.
9. Staff required to administer first aid (normally a trained first aider) should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued.
10. Staff should be careful in their use of language/terminology and must not make unnecessary comments which could be interpreted as having a sexual connotation.
11. There will be occasions when younger students are placed in settings outside their normal place of study. This may be a professional placement, field trip, summer school, masterclass or ‘taster’ event. Organisers must therefore ensure that policies and procedures are in place to protect young people/children from harm, focusing greatest protection on settings in which they may be at most risk (see separate Health and Safety Guidance on University field trips)
12. The personal telephone number, personal email or home address of any staff member should not be given to young students. Staff should avoid inappropriate familiarity with under 18s, and should not invite or allow them to socialise with them and/or to visit them at home.
13. In the case of any student making a disclosure or where there is cause for concern, explain to the student that this information will have to be referred on and follow the guidance in section 7. ‘Concerns about a vulnerable student / adult or child’. No attempt should be made to resolve any complaints alone. All allegations/reports of abuse made by children should always be acted upon and recorded. Potential concerns/allegations/reports of abuse made by children should always be reported to the Safeguarding Officer or, if absent, the Deputy Safeguarding Officer.
14. The University recommends that all University staff and students take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them.
15. If a member of staff feels that they or other members of the University may be at risk from being the subject of or exposed to unwarranted accusations in connection with younger students, they should report any potential concerns to their Head of Department.

## Pre-Admissions Arrangements

For full details of the Admissions Policy in relation to applicants under the age of 18 see the University’s ‘Admissions Policy Appendix G - Applicants under the age of 18’.

To ensure the University meets is duty of care, applications from students who will be under the age of 18 at the commencement of their course will be identified and the following actions taken:

* The parents/carers will be sent a form requesting permission for the applicant to attend the University. This draws attention to this Safeguarding and Prevent Policy as well as to the relevant appendix to the Admissions Policy.
* The parent/carer will be required to sign the permission form specifying they:
  + Give permission for the applicant to attend and understand the nature of the University environment and the nature of study to be pursued
  + Understand that the University will not act in loco parentis
  + Will take responsibility for the debts of applicant/student until such time as they reach the age of 18
  + Will make the applicant aware they may not buy alcoholic drinks at the Students’ Union
  + Understand that the University cannot release information about the applicant/student without their consent
  + Give consent for the student to be given emergency medical treatment
  + Will provide emergency contact details of a parent/carer or guardian resident in the UK.
* The Programme Leader will review, and keep under active review, the content of the programme of study to ensure that there is no inappropriate material, placement or other activity for a person under 18. If there is any material which is inappropriate for the under 18s special arrangements will be made for the student.
* The Head of Student Recruitment and Admissions will inform appropriate Academic Departments, Student Support and Wellbeing, Accommodation Services and the Students’ Union of the identity of new students who are under 18, to help ensure they are made aware of the available support. The Director of Students, Support and Information Services, as the Lead Safeguarding Officer, can advise staff on such matters.
* It will normally be a condition of accepting overseas students who are under 18 that they have a guardian in the UK who has authority to take decisions and give consent on the students' behalf, and that their parents/carers give consent for them to travel and live independently.

## Responsibilities of Academic Departments

Departments that enrol students who are under 18 must put special measures in place. These include the following:

1. One member of academic staff should be put forward to act as an Academic Adviser/Personal Tutor for all students who are under 18. The Director of Students, Support and Information Services is available to advise.
2. That person must undertake a DBS check. The cost for the DBS check will be borne by the University.
3. That person should be reminded of the special duty of care owed to underage students and in particular of the offence of abuse of trust under the Sexual Offences (Amendment) Act 2000.
4. The Academic Department must ensure that the nominated Academic Adviser / Personal Tutor is encouraged and given sufficient time away from other duties to be able to meet with under age students on a more regular basis. An early initial meeting should be followed up by regular individual meetings at least twice per Semester in order to establish substantial contact over and above the contact such a student might have with other members of staff in the department.
5. The Head/Director of Department should ensure s/he is available to discuss any problems or issues the Academic Adviser/Personal Tutor may wish to raise in respect of under age students.
6. The Director of Students, Support and Information Services will support Academic Advisers / Personal Tutors by providing information, advice and training for this aspect of their work.

## Accommodation

Parents/carers will be required to accept that any offer of University accommodation does not constitute the University acting *in loco parentis*. Where a student takes private accommodation, parents/carers are responsible for approving this and they or a third party must take responsibility for the student living in that accommodation.

The University will normally house students who are under 18 on entry in University accommodation. This will be for one year and students will then be expected to make arrangements for subsequent years in the same way as all other students.

All Staff Wardens will have enhanced DBS checks and will be advised of any under 18 year old students in their care. The Director of Students, Support and Information Services will support the Head of Campus and Residential Services by providing information, advice and training for this aspect of their work.

See the University’s ‘Under 18s Accommodation Policy and Procedures’ for more information on the University’s responsibilities for accommodating under age students.

## Under age drinking

Whilst the University recognises its special duty of care to students who are under 18, it will expect such students to act responsibly and appropriately and abide by the law. For example, it is not legal for a person under 18 to buy or be sold alcohol. The University expects the students to abide by the law in this respect.

The Students’ Union have the following arrangements to accommodate the under 18s:

* Young persons aged under 18 years old are allowed access to UCSU’s entertainments, other than licensed venues and where required by individual events licensing regulations. In line with the law, they are not able to purchase or consume alcohol.
* All bar and security staff are instructed to check the identification of anybody they suspect as under 18 years old.
* Any person found purchasing or attempting to purchase alcohol for an under 18 year old will be subject to the Students’ Union’s disciplinary procedure as will any under 18 attempting to purchase alcohol.
* On all events that are open to the public the Union shall operate ID checks with acceptable forms of ID being passports or driving licences (provisional or full).

## Social and Sporting Activities and Field Trips

Social and sporting activities and field trips, both academic and non-academic, are organised and supervised by the Students’ Union and other academic and non-academic departments.

Staff from those departments will ensure that the relevant individuals are aware of any activities which involve underage students and will follow these guidelines:

1. Where appropriate and if reasonably practicable, the University will seek consent for the student to participate in certain activities or to go on field trips. It is the responsibility of the student and the parents to keep the University informed of up to date contact details.
2. All departments should take all reasonable steps to identify their higher duty of care and ensure the safety of under 18 year old students through agreed procedures and good practice.
3. For on-campus activities, the provider should have systems to identify under 18 year old students and inform the students directly of their responsibilities in respect of disclosure.
4. For trips off campus which involve an overnight stay, the activity provider must ensure that group leaders and /or trip organisers are aware of the attendance of under 18 year old students and take appropriate child protection measures.
5. For social activities, the provider should take reasonable steps to ensure compliance with the law.
6. Risk assessments will be carried out as appropriate.

# Concerns about a vulnerable student / adult or child

## Flowchart of guideline actions



The University encourages staff and students to adopt a responsible approach to working with vulnerable adults and children and 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, regardless of the outcome. Allegations made maliciously will be dealt with following the University’s staff or student disciplinary procedures.

The following guidelines should be followed if there is a concern that a vulnerable student / adult or child is being abused or that a student is at risk of radicalisation. Given that this is a highly sensitive area, it is important to strike a balance between making a hasty or rash decision and at the same time not being negligent or dismissive. Historical cases should also be taken seriously.

Reports of such concerns should be made using the Cause for Concern Reporting Form in Appendix G. The Safeguarding and Prevent Lead for the department will have responsibility for providing immediate support and should be the person to whom the report is initially submitted. They will forward the report to and liaise with the Lead Safeguarding Officer. If the Safeguarding and Prevent Lead for the department is not available, a Safeguarding and Prevent Lead from another department or the Lead Safeguarding Officer can be contacted. Where there is a concern about immediate danger or violence, staff should contact Security and / or the Police.

**It is important that concerns and/or allegations should not be investigated by the member of staff but should be reported as soon as possible to the appropriate Department Safeguarding and Prevent Lead or Lead Safeguarding Officer.**

The actions to be taken are summarised above in section 7.1 Flowchart of guideline actions.

## Initial report

The following guidelines should be followed where concerns are raised relating to a vulnerable student / adult, child or a student at risk of radicalisation:

1. Consider the evidence that is giving rise to concern and assess how objective it is, eg is it a gut instinct, is it based on observation or on an explicit report? The purpose of the reflection here 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 good enough grounds to take further action.
2. Discuss the situation with the Head of Department or other similar senior colleague; out of hours the Duty Manager or On-Call Accommodation Officer can be called upon. This will help evaluation of the available information.
3. If it is agreed that a formal report is not required the LSO should be provided with brief details.
4. If action needs to be taken, consider whether the action needs to be urgent / emergency. If so, the following steps should be taken using judgement to decide the order in which the calls should be made: (a) phone the University Emergency number **6363** to notify Security; (b) contact the Police using either the **101** or **999** phone number; (c) notify the Lead Safeguarding Officer and Department Safeguarding and Prevent Lead; out of hours contact the Duty Manager or On-Call Accommodation Officer.
5. If the situation is not urgent the Department Safeguarding and Prevent Lead (academic or professional services) should be contacted or, if they are not available, the Lead Safeguarding Officer (see Appendix F).
6. Make a written record of the concerns as soon as possible using the form in Appendix G. This record should be sent to the Department Safeguarding and Prevent Lead and the Lead Safeguarding Officer and should be written in a way which is understandable to others. The record should try to capture:
   * Appropriate personal details of the vulnerable student / adult or child (name; student number; programme; year; age; address; telephone number; email address).
   * The nature of the concern; where the issue has been disclosed verbally use quotations where possible, being careful to be objective and factual. As far as possible make a chronological record including dates and times. Be objective; do not make assumptions; do not include personal opinions and interpretations. Signs of abuse may be referred to (see Appendix C).
   * The source(s) of information about the concern.
   * Any advice that has been given to the vulnerable student / adult or child.
   * What has been discussed with the vulnerable student / adult or child about confidentiality.
   * Names of staff with whom the incident has been discussed.
   * Details of the action that has been taken or any referrals that have been made (internal and external).
   * Date and signature of the person making the record. This can be a dual signature if you are writing the statement on behalf of a third party e.g. the student.

## Procedures to be followed by the Lead Safeguarding Officer (LSO)

The Lead Safeguarding Officer (LSO) fulfils a ‘facilitative’ rather than investigative role. Where issues about wider protection are not the responsibility of the University, eg when a student discloses childhood sexual abuse, the University may enquire about the potential risk for others, but it is the responsibility of the Local Authority and / or the Police to ensure that others are not at risk of abuse from the alleged abuser.

**Concerns raised that a child may be at risk:**

1. The University has an obligation to report this to the Local Authority via the Multi Agency Safeguarding Hub ([mash@westsussex.gcsx.gov](mailto:mash@westsussex.gcsx.gov), 01403 229900; out-of-hours phone 033 022 26664). The LSO may also refer to the Police where there is a significant risk of harm to a child.
2. The LSO will communicate with those involved in order to gather information and to relay this to the Local Authority Children’s Services.
3. When appropriate, even at this early stage, the LSO may take steps to initiate any staff or student disciplinary procedure.

**Concerns raised that a vulnerable adult may be at risk:**

1. The LSO will first decide if it is appropriate to meet with the student or staff member. This decision may be reached in consultation with one or more of the Student Support and Wellbeing team who may already be working with the student.
2. In so far as possible, the LSO will involve the vulnerable adult in the decision-making process, particularly if the vulnerable adult is a student of the University or someone with regular contact with the University.
3. This discussion will attempt to ensure that the nature and timing of the action is appropriate and that, where necessary, the vulnerable adult acts on her/his own behalf**. It must be recognised that adults have the right to self-determination (Mental Capacity Act 2005) and the University should not intervene in situations where the person is capable of making a sound judgement on her/his own behalf.**
4. The LSO will inform the vulnerable adult about: (a) the support available within the University and outside the University; (b) other services which s/he can access.
5. In some cases, the LSO will make an internal referral, eg to Wellbeing Services or the Disability and Dyslexia Service (DDS).
6. If it is deemed necessary to report the issue to Social Services, the LSO will contact the duty social worker and give her/him the details of the student (or other) along with a factual account (informed by any records submitted) of what has happened. Social Services will normally check if the student (or other) is on their data base and, if they are, they will refer the case to the allocated social worker. If not, they will normally investigate the allegation. Social Services will advise the LSO on the next appropriate steps, such as, referral to Police, Hospital, Housing or relevant Student Support and Wellbeing service.
7. If necessary (subject to Data Protection and confidentiality considerations), the LSO will make a direct report to the Local Authority (or appropriate agency such as the Police) without the vulnerable adult’s consent.
8. The LSO should contact the member of staff who made the referral and inform her/him of the action that has been taken, subject to Data Protection and confidentiality considerations. The student (or other) will be informed either by the LSO or the member of staff who made the initial referral.

**Concerns raised regarding risk of radicalisation:**

The LSO will pass all concerns regarding the risk of radicalisation to the Prevent Lead.

## Procedures to be followed by the Prevent Lead regarding possible risk of radicalisation

1. The Prevent Lead (or nominee) will first decide if it is appropriate to meet with the student or staff member.
2. In some cases, the Prevent Lead will make an internal referral, eg to Student Support and Wellbeing services such as Wellbeing Services or the Disability and Dyslexia Service (DDS).
3. The Prevent Lead may seek advice from appropriate Prevent Strategy Group members and / or the Local Authority Channel Panel Chair or the Police Prevent Liaison Team.
4. If the Prevent Lead believes that referral to ‘Channel’ may be appropriate, the matter shall be passed to the Channel Referral Panel (see Appendix D: Making a Channel referral in West Sussex) for consideration.

In the absence of the Prevent Lead, their deputy or the Lead Safeguarding Officer, concerns may be reported to any other member of the Vice-Chancellor’s Group (VCG).

## Guidelines for handling disclosures by a vulnerable student / adult or child

Where a vulnerable student / adult or child discloses abuse/radicalisation (or whom is suspected of experiencing abuse or is at risk of radicalisation) the conversation with them needs to be handled sensitively. Such conversations are often challenging and, for some people, they can stimulate memories of past personal experiences. The following suggestions may be helpful and staff may also find it useful to speak first with a member of Student Support and Wellbeing (eg Wellbeing Services or Student Health Service) for guidance; it is possible the subject of concern may already be known within these services. Student Support and Wellbeing services deal with similar conversations on a regular basis and will be very supportive. You may want to draw a second independent colleague or a member of the Student Support and Wellbeing team in with you to meet this student. This is only acceptable with the student’s consent.

**Concerns and allegations should not be investigated;** they should be reported immediately to the appropriate Department Safeguarding and Prevent Lead or Lead Safeguarding Officer.

* + Listen carefully and respond sensitively without expressing an opinion and without imposing your views and values.
  + Do not ask direct and invasive questions. These can prevent the person from telling the full account and can also trigger trauma symptoms.
  + Actively listen, give lots of time and don't pressurise.
  + Be aware that; for various reasons; disclosing such information can be difficult: (a) the person may be low in self-confidence; (b) s/he may have poor communication skills; (c) s/he may not expect to be believed; (d) there may be a background of threat or coercion; (e) there may be ‘secondary gains’ such as power or attention; (f) s/he may be protecting others, including an abuser/radicaliser or other potential victims; (g) the experience may have become a normal reality.
  + Stay calm and keep listening, without expressing whatever shock, disgust or alarm you may personally feel.
  + Be honest about needing to tell other people and reassure the person that you and others will try to keep them involved in the decision-making process.
  + Under no circumstances should you contact or confront the alleged abuser/radicaliser, even if they are known to you or is a student / staff member of the University.
  + Keep the details of the conversation and your notes (see above) confidential within the bounds of safeguarding expectations (see section 9 Sensitive information and section 11 Confidentiality).

# Concerns that a member of staff or a student may be abusing / radicalising others

## Flowchart of guideline actions



## Concerns about a member of staff

The University takes all possible measures to recruit safely. Despite this, there may be occasions when allegations regarding safeguarding issues are raised about another member of staff. University employees therefore need to 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 another member of staff.

## Concerns about a student

The [University of Chichester Admissions Policy](https://www.chi.ac.uk/about-us/policies-and-statements/academic-and-student-support) includes provision for the duty of care to all members of the University community and wider community. Procedures are in place to ensure that all relevant students (eg those accepted to programmes which include working with children or vulnerable adults) are DBS checked and applicants with criminal convictions are considered in line with the policy for the admission of applicants with criminal convictions (Admissions Policy s.10). However, there may be occasions when allegations regarding safeguarding issues are raised about a student.

## Procedures to be followed

It is important to note that any investigation of reports should only be carried out by suitably trained professionals appointed by the authorities to whom the report is passed.

When allegations of safeguarding issues are raised, whether against a member or staff or a student, the following procedure should be followed:

1. Consider the evidence that is giving rise to concern and assess how objective it is, eg is it a gut instinct, is it based on observation or on an explicit report? The purpose of this reflection is to clarify if there are good enough grounds to take further action.
2. Discuss the situation with the Head of Department or other similar senior colleague; out of hours the Duty Manager or On-Call Accommodation Officer can be called upon. This will help evaluation of the available information.
3. If it is agreed that a formal report is not required the LSO or Prevent Lead should be provided with brief details.
4. If further action is deemed appropriate a record of the concerns should be drawn up as soon as possible using the form in Appendix G and following the guidelines given in Section 6.2.6 above. The report should be given to the DSPL who will forward it to the LSO or Prevent Lead.
5. The Lead Safeguarding Officer will ensure that relevant University procedures are followed and, where appropriate, will inform Human Resources about the allegation. If it seems that disciplinary procedures may be appropriate the concern should be reported to the Chief Human Resources Officer (if the allegation is about a member of staff) or to the Deputy Vice-Chancellor (Student Experience) (if the allegation is about at student).
6. In matters of abuse:
   1. In matters of abuse of a vulnerable adult / child and where there is any doubt or uncertainty, the Lead Safeguarding Officer should contact the Local Authority Designated Officer (LADO) in the first instance. They will then take the referral and will advise on appropriate action, or discuss the allegation or concern to determine if there is genuine cause for concern and a need for further action.
   2. To ensure that all parties (including the person about whom the allegation has been made) are protected, the allegation of abuse should be discussed with the LADO prior to taking any further action.
7. In matters relating to radicalisation:

In matters relating to radicalisation the Prevent Lead (or deputy) may seek advice from the Local Authority’s Channel Panel Chair or the Police Prevent Lead.

1. If the report has been passed to the authorities (such as the Police) for investigation the LSO or Prevent Lead will act as the main liaison officer and will ensure that all relevant members of staff are kept informed including members of the Vice-Chancellor’s Group (VCG) and, where a member of staff is concerned, the Chief Human Resources Officer.
2. If and when the staff member is contacted by HR they may be advised to seek Union or legal representation if they so wish. External guidance may need to be sought before the said staff member is contacted to avoid a detrimental impact upon any investigation.
3. The University is required to report instances of misconduct relating to children and vulnerable adults to the Disclosure and Barring Service (DBS) and 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 vulnerable adults. In the case of a staff member, the responsibility lies with the Chief Human Resources Officer (or someone acting on their behalf). In the case of students, the responsibility lies with the Lead Safeguarding Officer.

# Students on placement

Where a student going on placement is under the age of 18 it is the responsibility of the placement coordinator to ensure that the placement organisation is informed of this so they can carry out the necessary additional risk assessment and put in place any additional safeguards that may be necessary.

Concerns relating to students undertaking University-accredited placements should be reported using the procedures in the previous sections. These may include concerns about matters affecting the student (eg abuse, neglect or radicalisation) or about the behaviour of the student towards others (eg abuse of children or vulnerable adults).

While concerns are explored by the University, the Deputy Vice Chancellor or Deputy Vice-Chancellor (Student Experience) 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 cooperate as far as possible with any investigation instigated by the placement provider as a result of their safeguarding procedures and shall ensure the Lead Safeguarding Officer is fully briefed.

# Sensitive information and record keeping

Clearly, issues relating to safeguarding and Prevent are highly sensitive. There is potential for harm to be done both to the person about whom there is cause for concern and, in some cases, to the person accused (if false allegations are made or if information is interpreted inaccurately). Only those who need to know from a professional perspective should be informed or receive written information about allegations. Staff should bear in mind that these issues are governed by legislation relating to confidentiality, human rights, and data protection.

It is recognised that dealing with these situations and listening to personal accounts can be distressing for the listener. A debriefing session may therefore be essential. Should this take place, it is important to do so without reference to identifying details. In some circumstances, staff may also wish to speak in confidence with a counsellor, this can be arranged by Human Resources.

Records made about allegations should be kept for seven years and then destroyed, unless they are the subject of ongoing proceedings. If and when an allegation is found to be false, the records should also be kept for seven years unless proceedings are ongoing.

Any records made by permitted University of Chichester parties of any alleged or actual Safeguarding / Prevent associated concerns will follow due process as set out in sections 4 to 10 of this Policy.

Where it can be justified in doing so, and in good faith, actual physical or on-line records will be kept and stored in compliance with current data protection legislation.

# Confidentiality

Safeguarding and Prevent issues present major challenges to confidentiality. To begin with, people are less likely to disclose that they are being abused / being radicalised, if they fear that this information will be passed on to others, including the Police. The same issue may exist for someone who is seeking help with their violent, abusive or potentially extremist or terrorist behaviour or thinking.

At present, even the most confidential of services within the University (such as Student Counselling) cannot provide a totally confidential relationship to students and others. Confidentiality is necessarily limited by the law and by some University policies.

When staff are aware that sensitive issues are about to be discussed, they should immediately make the limitations on confidentiality clear. It is good practice for services and teams (who have regular sensitive discussions with students) to have a privacy statement available on their Moodle pages and in other printed literature.

The need to extend confidentiality is rare but it most certainly applies in relation to safeguarding and Prevent issues such as:

* where the welfare of a vulnerable adult or child is at risk
* discussions where an intention to harm oneself or someone else are expressed
* where a student is at risk of being drawn into terrorism or ideologies that support terrorism or 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 extend confidentiality, staff are advised to first discuss the issues with a senior colleague (eg Head of Department or line manager) and to do so on what is called a ‘need to know’ basis only. Where possible and safe, the need to extend confidentiality should be discussed with the person making a disclosure.

It is important to stress that, in relation to safeguarding, staff cannot give an assurance of confidentiality. Instead, they 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. There may be exceptional circumstances where it is not possible to inform the person making the disclosure that the information will be passed on: eg 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.

See also the University’s [Privacy Standard and Privacy Notices](https://www.chi.ac.uk/about-us/policies-and-statements/data-protection).

# Training

Training is made available to staff via a range of methods to suit all members. The Staff Development Team include Safeguarding / Prevent delivery into the biannual staff induction / welcome to new staff days. In addition, there is a rolling programme of Safeguarding / Prevent face to face deliveries, bespoke by Department training, and on-line opportunities to engage with this Policy and subject areas.

Records are maintained of all attendees.

# Appendices

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**Abuse / Harm:** The experience of abuse can at times be subjective and is therefore difficult to clearly define. However, it is generally accepted that abuse is about the intentional or unintentional misuse of the power and control that one person has over another. This definition is ‘motive free’, i.e. it does not matter whether the perpetrator intended harm to take place. What matters is whether or not harm was caused. Abuse may be:

* A single act, of any scale, which causes harm and can be of varying degrees (see below)
* Repeated acts of a similar or different nature
* Intentional or unintentional. Causing harm may also be intentional or unintentional
* An act of neglect or a failure to act on the part of someone who has caring responsibilities

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

* 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

Unintentional harm may come about through lack of knowledge or, for example, due to the fact that a carer's own physical or emotional frailties make them unable to care adequately for the adult at risk.

Many seemingly innocent things can be used abusively. In addition, abuse is difficult to quantify and is also subjective. Example: (a) the distinction between banter (which is common among young males) and harassment, (b) the distinction between touch and physical invasion, (c) the distinction between an arranged marriage and a forced marriage, where one is a cultural expectation and the other is an imposition. It is therefore difficult to give definitive examples. However, the following examples are a useful starting point:

* Physical abuse and violence (see the definition of ‘Abuse (Physical)’)
* Verbal abuse and insults
* Sexual abuse, sexual harassment and grooming
* Emotional abuse
* Financial exploitation
* Bullying and harassment
* Exposing vulnerable adults / children to inappropriate materials such as pornography, violent films, and cruelty
* Preventing vulnerable students from attending classes
* Allowing vulnerable adults / children to be present when others are taking drugs or consuming Domestic violence
* high levels of alcohol
* Female Genital Mutilation
* Forced marriage
* Honour-based violence

Forms of abuse can also include neglectful behaviours such as being intoxicated while performing a care role and a wide range of other issues, such as discrimination or an attempt to isolate someone.

**Abuse (Physical)** - 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.

**Abuse (Emotional)** - is the persistent emotional maltreatment of a vulnerable adult / child such as to cause severe and persistent adverse effects on the vulnerable adult’s / child’s emotional development. It may involve conveying to vulnerable adult / child that they are worthless or unloved, inadequate, or valued in so far as they meet the needs of another person. It may feature overprotection or preventing the vulnerable adult / child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying or exploitation or corruption.

**Abuse (Sexual)** - Involves forcing or enticing a vulnerable adult or child to take part in sexual activities, whether or not the vulnerable adult / child is aware of what is happening. The activities may involve physical contact, including penetrative (eg rape or buggery) or non-penetrative acts. This may include involving vulnerable adults / children in looking at, or in the production of, pornographic material, or encouraging vulnerable adults / children to behave in sexually inappropriate ways. It may also include the sending of on-line sexual imagery of a personal nature.

**Abuse (Grooming)** - Befriending and establishing an emotional connection with a vulnerable adult / child to lower the vulnerable adult’s / child’s inhibitions for sexual abuse.

**Abuse (Neglect)** - The persistent failure to meet a vulnerable adult’s / child’s basic physical and/or psychological needs, likely to result in the serious impairment of the vulnerable adult’s / child’s health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a vulnerable adult’s / child’s basic emotional needs.

**Abuse (Financial or Material)** - May include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Abuse (Historic)** - Abuse which took place in the past.

**Abuse (Peer) -** Abuse carried out by vulnerable adults / children. This recognizes that vulnerable adults / children, particularly those living away from home, are also vulnerable to physical, sexual and emotional abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult in authority.

**Bullying, Harassment** **and Discrimination** - 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 vulnerable adult or child. Specific behaviours can be based on the individual’s age, gender, disability, religion, race, sexual orientation, gender reassignment or pregnancy / maternity status. 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” and generally has the purpose or effect of, *“violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.”[[3]](#footnote-4)*

The ACAS Guide suggests that, *“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.”*

It should also be noted that this may take a digital / on-line form via a range of social media platforms.

**Child or Young Person** - For the purpose of this Policy, the term ‘child or young person’ applies to a person who is less than 18 years of age.

**Disclosure** - The action of making new or secret information known. For the purposes of safeguarding the following types of disclosure should be recognised:

Indirect disclosure

* verbal hints that appear to be about abuse
* written hints that appear to be about abuse
* graphic hints, e.g. journal writing, drawings, art work that appear to be about abuse

Direct disclosure

* vulnerable student / adult or child says they are being abused
* vulnerable student / adult or child says they will tell about something happening to them only if certain conditions are met
* vulnerable student / adult or child pretends it is happening to someone else.

Third party disclosure

* student / member of staff / other person discloses abuse happening to another vulnerable student / adult or child

**Forced / Arranged Marriages** - A forced marriage is one in which one or both parties are married without their consent, unlike an arranged marriage where both parties consent to third party assistance in identifying a spouse. An arranged marriage becomes a safeguarding issue where the person concerned is a child or is an adult who lacks mental capacity. Adults with learning disabilities have the right to get married but must have capacity to consent. No one can consent to marriage on behalf of someone else.

For further details see: 'Multi-agency practice guidelines: Handling cases of forced marriage' (Home Office, 2009); Forced Marriage (Civil Protection) Act 2008, Article 16(2); the Universal Declaration of Human Rights.

**Legal Duty** - The University recognises that it has a legal duty to identify where there are safeguarding issues and take appropriate action to address them in partnership with other organisations that can investigate further and take the necessary action to ensure an effective outcome. Government guidance makes it clear that it is not the University’s responsibility to investigate abuse but to take appropriate action to prevent and report it where necessary.

**Regulated Activity -** Regulated activity is work that a barred person must not do. It is an activity which is subject to the requirements of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. The following are examples of ‘regulated activity’, which is defined in Schedule 4 of the Act:

Regulated Activity for adults now covers:

* Providing healthcare (regarding physical or mental health) eg counsellors, nurse health advisers, mental health adviser
* Providing personal care
* Providing social work
* Assisting with general household matters (bills, shopping etc)
* Assisting in the conduct of people’s own affairs
* Conveying adults to, from, or between places where they receive healthcare, relevant personal care or social work because of their age, illness or disability.

Regulated activity relating to children means a person can be engaged in regulated activity because of:

* What they do (activities), eg a University of Chichester student who is on placement or engaged in research with children and / or vulnerable adults
* Where they work (establishment), eg University staff working on Access and Outreach (previously Widening Participation) projects within schools/academies
* Who they are (specified position)

Regular unsupervised activities involving children will typically be Regulated Activity. Examples are:

* Teaching; training; instructing; caring for; supervising
* Providing advice/guidance on well-being
* Driving a vehicle solely for children
* Regular work in a limited range of establishments (‘specified places’), with opportunity for contact: eg schools, children’s homes, childcare premises
* Relevant personal care - even if done as a ‘1-off’ (i.e. it does not need to be a regular activity)
* Registered child-minding and foster-caring

From the University’s perspective, staff, students or people who are external to the University, are considered vulnerable if they need special protection against harm and/or need specific interventions or specialised services in order to engage successfully with their studies or their job, to stay on at

University, to achieve their full potential in study or in work. A sizeable minority of students are vulnerable or an adult at risk.

**Vulnerable Adult** -All adults (vulnerable or otherwise) can, in certain contexts, be at risk of abuse and exploitation. Some adults are more vulnerable than others. ‘Vulnerable Adults’ includes those who, because of mental health difficulties, physical health conditions or personal circumstances, may be vulnerable to abuse, exploitation or significant harm. The Department of Health defines an adult to whom safeguarding duties apply as a person over 18 years of age who:

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.*[[4]](#footnote-5)

It is difficult to give an exhaustive list of those who may be considered ‘vulnerable adults’, so what follows is intended to be indicative only:

1. People who do not have the mental capacity to make decisions about their own safety
2. People who have communication difficulties
3. People who are physically dependent on others for personal care and activities of daily life
4. People with low self-esteem and may therefore be easily influenced
5. Those who have experienced abuse / childhood abuse
6. Those living away from home
7. Those living in an environment marked by domestic violence or drug misuse
8. Those living in temporary accommodation
9. Migrants or people who are seeking refugee status
10. Victims of trafficking
11. Individuals who have a history of bullying and/or abuse
12. Care Leavers
13. Carers
14. Someone subject to forced marriage

It should be noted that this concept of ‘vulnerable adult’ is different from that in the Safeguarding Vulnerable Groups Act, where adults are considered to be ‘vulnerable’ because of the types of regulated activities which are applied to them (see ‘Regulated activity’, above).

## Appendix B: Definition of Prevent Terms

**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. The government has issued statutory guidance for all public authorities, and guidance specifically aimed at universities, on this duty (the ‘Prevent Duty Guidance: for higher education institutions in England and Wales’; July 2015).

The Prevent programme reinforces the message that the University has a role to play in supporting students who are vulnerable to being drawn into terrorism or extremist ideologies which are conducive to terrorism. As recent examples in the media statistically indicate, many of those who have become radicalised can be considered vulnerable as a result of coming from a background where the following have been experienced in isolation or in combination:

* being in care
* having a disability or a mental health condition
* poverty
* isolation
* addiction
* financial problems
* past traumatic events.

Others can be considered vulnerable as a result of their ‘protected characteristics’ as defined in the Equality Act, (2010), eg race, religion, sexuality or gender.

**Extremism** - Defined in the Prevent duty guidance 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas”.

**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”.

**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.

## Appendix C: Potential Signs of Abuse and Radicalisation

**Abuse**

The word ‘potential’ is used in this context because the ‘signs’ are precisely that, they signpost rather than take you to a destination. 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 vulnerable adults and children the clearest sign is an actual report or direct statement. The fact that someone confides in you is a statement of trust in you. With this trust goes the responsibility to respond to the disclosure regardless of the nature of the relationship you have with the person in question. You are not deciding if there is sufficient evidence or if the allegation is ‘true’ - this is the responsibility of either Social Services or the Police. The relevant 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: [www.scie.org.uk](http://www.scie.org.uk)

**Extent of Harm (Abuse or Exposure to Radicalisation)**

The extent of harm, whether from abuse or exposure to radicalisation, is not always easy to quantify particularly in the early stages of awareness. This necessitates that reports or suspicions of abuse/exposure to radicalisation should be approached openly and without prejudice. This matters to both sides, the person making the allegations and the person about whom the allegations have been made, both of whom deserve to be treated fairly.

According to the Social Care Institute for Excellence (SCIE), ‘significant harm' is a legal concept and one that has not been defined. SCIE (2013) therefore advises professionals to consider the following points:

* The degree of the vulnerability of the person
* The nature and extent of the alleged abuse/neglect/exposure to radicalisation
* The length of time the alleged abuse/neglect/exposure to radicalisation has been occurring
* The impact of the alleged abuse/exposure to radicalisation on the adult at risk
* The risk of repeated or increasingly serious acts of abuse/neglect/exposure to radicalisation
* The risk that serious harm could result if no action was taken
* The illegality of the alleged act or acts

It is important to note that any investigation of reports should only be carried out by suitably trained professionals appointed by the authorities to whom the report is passed.

**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 about ‘signs’ (see ‘Abuse’ above) therefore needs to be emphasised in relation to radicalisation, which presents even greater problems of identification. What follows is an amalgam of what appears in relevant literature and it should be noted that many of these behaviours 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 - both physical and dress / presentation
* 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
* Change of appearance and / or contents of accommodation (eg posters on wall, other decorations ornaments)

## Appendix D: Making a Channel referral in West Sussex

**Making a Channel referral in West Sussex**

1. What is Channel?
   1. ‘Channel’ is a key element of the *Prevent* strategy.
   2. Channel is the name for the process of identifying and referring a person at risk of radicalisation for early intervention and support. It is a multi-agency approach to protect vulnerable people using collaboration between local authorities, statutory partners (such as education and health organisations, social services, children’s and youth services and offender management services), the police and the local community. Channel operates to:

* Identify people at risk of being drawn into terrorism;
* Assess the nature and extent of that risk; and
* Develop the most appropriate support plan for the individuals concerned.
  1. Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel aims to safeguard children and adults of any faith, ethnicity or background before their vulnerabilities are exploited by those that would want them to embrace terrorism. The emphasis is on early intervention to protect and divert people away from the risk they face before being drawn into committing terrorist-related activity.
  2. Channel operates in the ‘pre-criminal’ space. It is not suitable for an individual who you believe has – or is about to – commit a criminal offence, this should be reported to the police. A referral to Channel will not result in an emergency response.

1. Who to contact if you have a concern
   1. If you have any concerns about an individual possibly being drawn into or supporting terrorism, examine them first with your manager. If this is not possible, or if, having considered the case, you still believe there may be grounds for a Channel referral, contact any of the following to discuss the case:

**Sussex Police Prevent Team**:

Telephone 101 | Ext. 531355

Email: [prevent@sussex.pnn.police.uk](mailto:prevent@sussex.pnn.police.uk)

**Or**

**Local Channel Panel Chairs**

For West Sussex:

Beverly Knight

Better Communities, WSCC

Telephone 0330 222 4223 | Mobile 0789 458 9071

Email: [beverly.knight@westsussex.gov.uk](mailto:beverly.knight@westsussex.gov.uk)

For Crawley:

Lindsay Adams

Community Development, Crawley Borough Council

Telephone 01293 438500

Email: lindsay.adams@crawley.gov.uk

3. How to make a referral to Channel

* 1. Consult with any of the professionals above regarding the suitability of the referral. They can provide you with a ‘Channel referral and assessment form’ (see appendix A).
  2. Complete the form and return it to the Channel Co-ordinator by email to: [channel@sussex.pnn.police.uk](mailto:channel@sussex.pnn.police.uk)
  3. The Police Channel Practitioner will then complete an extensive risk assessment. At no point will the person be created on the criminal records system, but a local intelligence report will be created.
  4. The Sussex Police Counter Terrorism Intelligence Unit will also complete a case summary which is returned to the Prevent Engagement Officer and the referrer.

1. Consent
   1. Participation in Channel is voluntary and requires consent to be given by the individual (or their parent or guardian in the case of anyone under 18) in advance of support measures being put in place.
   2. All individuals who receive support through Channel must be made aware that they are receiving this as part of a programme to protect people from being drawn into terrorism and what to expect.
   3. Where someone does not wish to continue with the process it may be appropriate to provide alternative support through other mainstream services.
   4. Individuals (or their parent/guardian) must give their consent before any information is shared about them as part of the Channel programme.
   5. If there are any issues with consent, i.e. it is not (or unlikely to be) given, discuss this with any of the individuals named at 2.1.
2. The Channel panel
   1. The role of the Channel panel is to develop an appropriate support package to safeguard those at risk of being drawn into terrorism based on an assessment of their vulnerability.
   2. Channel assesses vulnerability using a consistently applied vulnerability assessment framework, built around an individual’s engagement with an ideology or cause; their intent to cause harm and capability to cause harm.
   3. The panel is responsible for managing the safeguarding risk, in-line with other multi-agency panels where risk is managed, such as Children and Adult Safeguarding panels and Multi-Agency Public Protection Arrangements (MAPPA).
   4. For Crawley cases, the panel will be chaired by Crawley Borough Council, and for the rest of West Sussex, West Sussex County Council. Other panel members will include the Channel Police Practitioner and any other relevant statutory partners, depending on the nature of the referral. The following agencies now have a statutory duty to co-operate with the panel and the police:

* NHS staff
* Social care staff, including Directors of Children’s and Adults’ Services
* Schools, further education colleges and universities
* Youth Offending Services
* Chairs of Local Safeguarding Children Boards and Safeguarding Adults Boards
* Local Authority Safeguarding Managers
* Home Office Immigration
* Border Force
* Housing
* Prisons
* Probation
  1. The panels meet monthly as a minimum. Where significant information arises about a case which requires the panel to meet earlier than scheduled or more frequently, the Channel Panel Chair will convene additional panels.
  2. Ownership of the safeguarding risk lies with the multi-agency Channel panel. This is the risk to an individual as a result of their vulnerability.
  3. The Chair of the panel is responsible for ensuring that any safeguarding risks are referred to the most appropriate agencies for action; until this happens the Channel panel owns these risks.
  4. The support for some individuals will span several agencies; each agency involved will own the element of risk they are responsible for addressing through the support plan.
  5. Ownership of the risk of involvement in terrorism lies with the police. This is the risk posed by the individual to themselves and society through their potential active involvement in criminality associated with terrorism.

1. Support package and support plan
   1. If the case is adopted onto Channel, the panel will develop a support package. This will be based on:

* A review of the vulnerability assessment completed by the Channel Police Practitioner at the preliminary assessment stage;
* The needs of the individual; and
* Any risks posed to potential support providers.

The type of activities included in a support package will depend on the individual’s assessed risk, vulnerability and resources available. A diversionary activity may be sufficient for someone who is in the early stages of radicalisation to violence, whereas a more focussed and structured one-on-one mentoring programme may be required for those who are already becoming radicalised.

* 1. The following are examples of support programmes which may be considered:

a. **Mentoring support contact** – work with a suitable adult as a role model or providing personal guidance, including guidance addressing extremist ideologies;

b. **Life skills** – work on life skills or social skills generally, such as dealing with peer pressure;

c. **Anger management session** – formal or informal work dealing with anger;

d. **Cognitive/behavioural contact** – cognitive behavioural therapies and general work on attitudes and behaviours;

e. **Constructive pursuits** – supervised or managed constructive leisure activities;

f. **Education skills contact** – activities focused on education or training;

g. **Careers contact** – activities focused on employment;

h. **Family support contact** – activities aimed at supporting family and personal relationships, including formal parenting programmes;

i. **Health awareness contact** – work aimed at assessing or addressing any physical or mental health issues;

j. **Housing support contact** – activities addressing living arrangements, accommodation provision or neighbourhood; and

k. **Drugs and alcohol awareness** – substance misuse interventions.

6.4 Channel intervention providers engaging with these vulnerable individuals are first have been approved by the Home Office. This is particularly important where an individual has a need for theological/ideological support.

1. Reviewing risk

7.1 Individuals receiving support will be reassessed at least every 3 months.

If the panel is satisfied that the risk has been successfully reduced or managed they should recommend that the case exits the process, completing a closing report.

7.2 If the panel is not satisfied that the risk has been reduced or managed, the case will be reconsidered. A new action plan will be developed and alternative support put in place.

7.3 All cases are reviewed at 6 and12 months from the point at which they exit the process, by the senior managers involved in the preliminary assessment.

**Further information:**

[Channel Duty Guidance](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf)

[Channel General Awareness training module](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

[Prevent Strategy](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf)

[Prevent Duty Guidance](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf)

**Restricted when Complete**

|  |  |  |  |
| --- | --- | --- | --- |
| **Sussex**  **Prevent ‘Channel’ Referral Form** | | | |
| **Referral Details** | | | |
| **Name:** |  | | |
| **Alternative name:** |  | | |
| **Date of Birth:** |  | **Gender:** |  |
| **Address:** |  | | |
| **Nationality:** |  | **Ethnicity:** |  |
| **Language (first):** |  | **Faith:** |  |
| **School/college or Occupation/workplace:** |  | | |
| **Family or Carer details:** |  | | |
| **Referring Agency Details** | | | |
| **Referral Author and Contact Details:** |  | | |
| **Agency:** |  | | |
| **Date of Referral:** |  | | |

|  |  |  |
| --- | --- | --- |
| **Vulnerability Factors** | | |
| **Factor** | Notes | Y/N |
| **Faith/Ideology** | e.g. Concerning comments relating to faith or ideology, or association with extremists |  |
| **Social Mobility** | e.g. poverty, lack of education or employment, immigration issues |  |
| **Physical or mental health** | e.g. Disability, learning difficulties, mental health concerns |  |
| **Risk or harm factor** | e.g. threat posed by family member (DV issues), victim of hate crime or personal attack |  |
| **Criminal Activity or association** | e.g. involved in criminal activity or associating with known criminals |  |
| **Isolation or exclusion** | e.g. lack of social activity, isolation, absent peer groups |  |
| **Other factor** | Any other factors  Please specify: |  |
| **Is the individual aware of the referral?** | Although it is not necessary or always beneficial to notify an individual, whether they are aware is important. |  |

**Restricted when Complete**

|  |
| --- |
| **Summary reason for referral** |
| Outline main reasons for referral: |
| **Existing agency involvement** |
| Outline any existing agency involvement (that you are aware of) e.g. CAF, MAPPA, Safeguarding: |
| **Any other relevant information** |
|  |
| **Notes:** A Channel referral places an individual into a multi-agency assessment and support process which aims to reduce their vulnerability to extremist related activity. Each referral is screened for suitability. Further information will be sought from partner agencies before any support mechanisms are put in place. Your referral is important and does not mean an individual is a terrorist or will become a terrorist, only that vulnerabilities have been identified which require further investigation or help. Please provide as much detail as possible.  If you have any questions or concerns please do not hesitate to discuss with your Prevent Lead, your safeguarding lead, or local Police Prevent Engagement Officer. |

When completed please email to **channel@sussex.pnn.police.uk**

## Appendix E: Overview of the UK Government’s Anti-Terrorism Strategy

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*.[[5]](#footnote-6)

|  |  |  |  |
| --- | --- | --- | --- |
| **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:

* 1. 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.
  2. 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
  3. 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 are 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, eg 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’.

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 (d) claims of involvement in combat or violent activity on behalf of violent extremist groups.

The University has established a Channel Referral Panel chaired by the Lead Prevent Officer (the Deputy Vice-Chancellor) and including the Deputy Vice-Chancellor (Student Experience) plus two other members from the Prevent Strategy Group. In the absence of the LPO and the DPLO, other members of the Prevent Strategy Group will convene the Channel Referral Panel. In light of advice from the Local Authority, the Panel will consider whether a referral to Channel should be made. The student / individual who is the subject of the referral will be informed of the Panel’s decision and the reasons for the decision.

## Appendix F: Safeguarding and Prevent Officers and Out of Hours Contacts

**The University’s Lead Safeguarding Officer and Prevent Lead:**

Dave Corcoran, Director of Students, Support and Information Services   
and Chair of the Prevent Strategy Group

[D.Corcoran@chi.ac.uk](mailto:D.Corcoran@chi.ac.uk) - 01243 816459

**The Deputy Prevent Lead:**

Professor Simeon Keates, Deputy Vice-Chancellor

[S.Keates@chi.ac.uk](mailto:S.Keates@chi.ac.uk) - 01243 816030

**The Deputy Lead Safeguarding Officer:**

Dr Mark Mason, Deputy Vice-Chancellor (Student Experience)

[M.Mason@chi.ac.uk](mailto:M.Mason@chi.ac.uk) - 01243 816422

**The following have been designated as Department Safeguarding and Prevent Leads:**

**Directors of University of Chichester Institutes:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Institute** | **Director** | **Email** | **Phone** |
| Institute of Arts and Humanities | Prof. Hugo Frey | [H.Frey@chi.ac.uk](mailto:H.Frey@chi.ac.uk) | 01243 816200 |
| Institute of Education, Social  and Life Sciences | Dr Antonina Pereira  Chris Smethurst  Dr Chris Shelton (Education) | [A.Pereira@chi.ac.uk](mailto:A.Pereira@chi.ac.uk)  [C.Smethurst@chi.ac.uk](mailto:C.Smethurst@chi.ac.uk)  [C.Shelton@chi.ac.uk](mailto:C.Shelton@chi.ac.uk) | 01243 816359  01243 816237  01243 812028 |
| Institute of Sport, Nursing and Allied Health  Deputies | Prof. Mike Lauder  Dr. Melissa Mantle  Dr Nita Muir (Nursing) | [M.Lauder@chi.ac.uk](mailto:M.Lauder@chi.ac.uk)  [M.Mantle@chi.ac.uk](mailto:M.Mantle@chi.ac.uk)  [N.Muir@chi.ac.uk](mailto:N.Muir@chi.ac.uk) | 01243 816328  01243 816380  01243 793419 |
| The University of Chichester Conservatoire | Ben Hall | [B.Hall@chi.ac.uk](mailto:B.Hall@chi.ac.uk) | 01243 816197 |

**Academic Departments:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Department** | **Head** | **Email** | **Phone** |
| Business School | Prof. Dave Cooper | [D.Cooper@chi.ac.uk](mailto:D.Cooper@chi.ac.uk) | 01243 812193 |
| Department of Creative Industries | Michael Holley | [Michael.Holley@chi.ac.uk](mailto:Michael.Holley@chi.ac.uk) | 01243 816183 |
| Department of Engineering, Computing and Design | Prof. Stuart Harmer | [S.Harmer@chi.ac.uk](mailto:S.Harmer@chi.ac.uk) | 01243 816068 |

**Professional Services Departments:**

| **Department** | **Name** | **Title** | **Email and Phone** |
| --- | --- | --- | --- |
| Vice Chancellor’s Group | Prof. Jane Longmore | Vice-Chancellor | [J.Longmore@chi.ac.uk](mailto:J.Longmore@chi.ac.uk)  01243 816050 |
| Academic Quality & Standards | Katie Akerman | Director of Quality and Standards | [K.Akerman@chi.ac.uk](mailto:K.Akerman@chi.ac.uk)  01243 816469 |
| Academic Registry | Su Longden | Academic Registrar and Data Protection Officer | [S.Longden@chi.ac.uk](mailto:S.Longden@chi.ac.uk)  01243 815020 |
| Admissions, Recruitment and Marketing | Mark Barlow | Chief Marketing Officer | [M.Barlow@chi.ac.uk](mailto:M.Barlow@chi.ac.uk)  01243 816360 |
| Chaplaincy | Rev’d Dr.  Alison Green | Chaplain | [Alison.Green@chi.ac.uk](mailto:Alison.Green@chi.ac.uk)  01243 816041 |
| Estate Management and Residential Services | Charles White  Joe Ayres | Head of Campus and Residential Services  Accommodation  Manager | [C.A.White@chi.ac.uk](mailto:C.A.White@chi.ac.uk)  01243 816081  [J.Ayres@chi.ac.uk](mailto:J.Ayres@chi.ac.uk)  01243 793417 |
| Finance | Claire Price | Director of Finance | [Claire.Price@chi.ac.uk](mailto:Claire.Price@chi.ac.uk)  01243 816124 |
| Health, Safety and Environment | Kevin Hickman | Health and Safety Adviser | [K.Hickman@chi.ac.uk](mailto:K.Hickman@chi.ac.uk)  01243 816488 |
| Human Resources | Elisabeth Whitaker | Chief Human Resources Officer | [E.Whitaker@chi.ac.uk](mailto:E.Whitaker@chi.ac.uk)  01243 816119 |
| Directorate of Students, Support and Information Services | Dave Corcoran  Vito Mastrolonardo  Dr Rod Matthews  Karen Lloyd | Director of Students, Support and Information Services    Deputy Director of Students, Support and Information Services  Director of Information and Learning Technologies  University Librarian | [D.Corcoran@chi.ac.uk](mailto:D.Corcoran@chi.ac.uk) 01243 816459  [V.Mastrolonardo@chi.ac.uk](mailto:V.Mastrolonardo@chi.ac.uk) 01243 816257  [R.Matthews@chi.ac.uk](mailto:R.Matthews@chi.ac.uk) 01243 816150  [K.Lloyd@chi.ac.uk](mailto:K.Lloyd@chi.ac.uk)  01243 812082 |
| University of Chichester Academy Trust | Sue Samson | Chief Executive Officer | [S.Samson@chi.ac.uk](mailto:S.Samson@chi.ac.uk)  01243 793500 |

**The Students’ Union**

| **Name** | **Title** | **Email and Phone** |
| --- | --- | --- |
| Anne Elliott | General Manager | [A.Elliott@chi.ac.uk](mailto:A.Elliott@chi.ac.uk) 01243 816398 |
| John Williams | Commercial Services Manager | [J.Williams@chi.ac.uk](mailto:J.Williams@chi.ac.uk) 01243 816400 |
| Richard Askey | Marketing and Communications Manager | [R.Askey@chi.ac.uk](mailto:R.Askey@chi.ac.uk) 01243 816378 |

**Out of Hours Contacts**

| **Name** | **Phone** |
| --- | --- |
| **University Emergency Number** (including Duty Manager and on-call Accommodation Officer) | **01243 816363** |

## Appendix G: Safeguarding/Prevent Duty - Cause for Concern Reporting Form

**This form is strictly confidential and should be delivered to the Lead Safeguarding Officer / Department Safeguarding and Prevent Lead. Please do not make or keep a copy of this form.**

|  |  |
| --- | --- |
| **Details of person of concern (whether at risk or the alleged perpetrator)** | |
| Name | Student  Staff  Id. number: |
| Date of birth / age | Phone / Mobile Number |
| Email address | Student address  Staff department  : |

|  |  |
| --- | --- |
| **Concern / Disclosure / Allegation / Incident** | |
| Name of source of information (if different from above) and contact details (mobile no, email) | |
| Date of incident | Approximate time |
| Description of concern / allegation  *Continued overleaf* | |
| Action taken and by whom  *Continued overleaf* | |

|  |  |
| --- | --- |
| **Concern has been discussed with (please check and give names)** | |
| Department Safeguarding and Prevent Lead | Department name: |
| Lead Safeguarding Officer | Head of Department |
| Line Manager | Other (specify) |

|  |  |
| --- | --- |
| **Details of person completing this report** |  |
| Name | Role |
| Telephone Number | Email address |
| Signature | Date |
| **Continued from previous page:** | |
|  | |

## Appendix H: References & Resources

Home Office E-Learning Training on Prevent: This offers an introduction to the Prevent duty, and explains how it aims to safeguard vulnerable people from being radicalised to supporting terrorism or becoming terrorists themselves.

<https://www.elearning.prevent.homeoffice.gov.uk/>

Revised Prevent Duty Guidance: for England and Wales - Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (updated 1 April 2021)

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Prevent Duty Guidance: for higher education institutions in England and Wales (updated 1 April 2021)

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

Social Care Institute for Excellence (SCIE) - Safeguarding adults: e-learning course

<https://www.scie.org.uk/e-learning/safeguarding-adults>

Home Office - User Guide to Operation of Police powers under the Terrorism Act 2000 and subsequent legislation: Arrests, outcomes and stop and search, Great Britain (updated March 2021)

<https://www.gov.uk/government/publications/user-guide-to-operation-of-police-powers-under-the-terrorism-act-2000-and-subsequent-legislation>

Safeguarding Vulnerable Groups Act 2006

<http://www.legislation.gov.uk/ukpga/2006/47/pdfs/ukpga_20060047_en.pdf>

Working Together to Safeguard Children: July 2018 – Statutory guidance on inter-agency working to safeguard and promote the welfare of children (first published March 2015).

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

West Sussex Safeguarding Children Partnership (webpage)

<http://www.westsussexscb.org.uk/>

Tackling Extremism in the UK: Report from the Prime Minister’s Task Force on Tackling Radicalisation and Extremism (December 2013)

<https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263181/ETF_FINAL.pdf>

Roots of Violent Radicalisation: Nineteenth Report of Session (House of Commons) 2010-12 <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmhaff/1446/1446.pdf>

Data Protection Act 2018

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Guide to the UK General Data Protection Regulation (UK GDPR)

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

## Appendix I: Risk Issues Checklist for Summer Schools

|  |  |  |
| --- | --- | --- |
| **Action Point** | **Action to be taken** | **✓** |
| 1 | I have checked that the HEI has appropriate insurance cover for the summer school activates |  |
| 2 | I have made arrangements for the insurance of those activities not covered by the HEI’s insurance cover.  *Write NA in the next column if this action point is not applicable* |  |
| 3 | I have set up a system for storing student data, especially that in **Parental Consent Forms**, which is safe but accessible to key staff. |  |
| 4 | I have made arrangements for there to be clear handover points for students arriving at the summer school and on completion of the course. In addition, I have communicated these arrangements in writing to students and parents/carers, or have plans to do so |  |
| 5 | I have issued the model **Code of Behaviour for Students**, or a modified version of it, to students and parents/carers |  |
| 6 | I have made arrangements for removing students from the summer school in the event of serious incidents of misbehaviour, including arrangements for staff to escort students home when necessary |  |
| 7 | I have made arrangements for separate male and female sleeping and bathroom facilities for students and staff.  *Write NA in the next column if the summer school is entirely non-residential* |  |
| 8 | I have appointed responsible adults who have received DBA checks to work as night-time supervisors at residential accommodation sites.  *Write NA in the next column if the summer school is entirely non-residential* |  |
| 9 | I have put in place emergency procedures in the event of a fire or other emergency and will brief staff and students accordingly |  |
| 10 | I have put in place a system for reporting and investigating accidents and ‘near misses’ |  |
| 11 | I have made arrangements regarding first aid so that emergency help will be available at all times while the summer school is running |  |
| 12 | I have made arrangements so that any student who requires prescribed medication during the summer school will be able to receive it |  |
| 13 | I have put in place procedures to ensure the safety of students’ personal possessions and for the security of HEI property |  |
| 14 | I have prepared information for students, or have plans to do so, that includes details of the personal support they will receive during the course |  |
| 15 | I have made arrangements for staff, including mentors/buddies, and visitors to the summer school to be readily identifiable to students |  |
| 16 | I have checked that risk assessments for summer school activities exist and are valid, and conducted further risk assessments where necessary |  |
| 17 | I have consulted those organisation hosting off-site visits and checked that they are aware of potential risks and will follow appropriate safety procedures |  |
| 18 | I have checked that staff responsible for ‘adventurous activities’ are suitably qualified, and I am aware of the safety arrangements that will be in operation |  |
| 19 | I have developed a **Child Safeguarding Policy** for the summer school along with a **Code of Practice** for putting this policy into practice |  |
| 20 | I have provided training/induction for staff, or have plans to do so, including the specific training/induction of mentors/buddies who will be working closely with students |  |
| 21 | I have considered the adult-student ratios to be in operation throughout the summer school course and believe them to be appropriate in ensuring safe supervision |  |
| 22 | I have made arrangements for pupils who will be accessing websites and books to be constantly monitored by staff in order to detect the **accessing of unsuitable websites or texts**. I have checked the HEI intranet to ascertain how access to websites is monitored and accessing unsuitable material can be detected |  |

1. Care Quality Commission 26 June 2015 [↑](#footnote-ref-2)
2. As defined in the Children Act 1989 [↑](#footnote-ref-3)
3. Equality Act, 2010 [↑](#footnote-ref-4)
4. The Care Act 2014. [↑](#footnote-ref-5)
5. CONTEST: The United Kingdom’s Strategy for Countering Terrorism; July 2011 [↑](#footnote-ref-6)