



Safeguarding Policy

Core Documentation Cover Page					
Safeguarding Policy					
Version number	Dates produced and approved (include committee)	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
V1.0	Nov 2011 SMT	Approved	HR Officer	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2012 Or in line with any legislative changes.
V2.0	Nov 2012 SMT	Annual Review	HR Officer	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2014 Or in line with any legislative changes.
V3.0	Mar 2015 SMT	Reviewed with changes to reflect current practice / role titles.	Head of Clinical Practice	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Mar 2017 or in line with any legislative changes
V4.0	Nov 2016 SMT	Major Amendments in response to Prevent Duty legislation.	Head of Clinical Practice HR Manager	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2018 or in line with any legislative changes
V5.0	Aug 2017 PRAG Chair	Administrative Amendments to update institution name change from British School of Osteopathy to University College of Osteopathy and to update committee titles.	Head of Clinical Practice HR Manager	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2018 or in line with any legislative changes
V6.0	May 2018 PRAG Chair	Administrative Amendments to reflect title changes (i.e. from Principal to Vice-Chancellor, etc.)	Head of Clinical Practice HR Manager	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2018 or in line with any legislative changes
V7.0	Jul 2018 PRAG Chair	Administrative Amendments to update Safeguarding Officers	Head of Clinical Practice HR Manager	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Nov 2018 or in line with any legislative changes

V8.0	Mar 2019 PRAG Chair	Administrative Amendment to update Safeguarding Officers	Head of Clinical Practice HR Manager	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Nov 2018 or in line with any legislative changes
V9.0	Nov 2021 SMT	Minor Amendments to update legislation, weblinks, Safeguarding Officers, and to replace the Word reporting form with a form on SharePoint.	Head of Student Services	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Nov 2024 or in line with any legislative changes
Equality Impact					
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)					
Neutral equality impact (i.e. no significant effect)					X
Negative equality impact (i.e. increasing inequalities)					
If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk					

Safeguarding Policy

CONTENTS

1. Scope	6
2. Part A: Safeguarding of Children, Young People and Vulnerable Adults	6
2.1 Introduction to Part A	6
2.2 Glossary and Acronyms used in Part A of the policy	7
2.3 Aims of Part A of the Policy	7
2.4 Review	8
2.5 Part A Guidance for Staff, Students, Volunteers and Other Related Parties	8
A) What is abuse?	8
B) Who is responsible for protecting children and vulnerable adults?	9
C) What do I do if I think a child or vulnerable adult is in danger?	11
D) What do I do if a child or vulnerable adult discloses to me that they are being abused?	11
E) What do I do if I have suspicions that a colleague may be abusing a child or vulnerable adult, or not following good practice?	12
F) Should I tell the parents/carers of the child or vulnerable adult about my concerns?	12
G) What information should I record?	13
H) What do I do if I am asked for information by another organisation?	13
I) Where can I find more information and useful contacts?	14
3. Part B: Safeguarding Against Radicalisation	16
3.1 Introduction	16
3.2 Glossary & Acronyms	16
3.3 Aims of Part B of the Policy	16
3.4 Part B: Guidance for Students and Employees	17
A) How do I Identify an Individual at Risk from Radicalisation?	17
B) What are the indicators that suggest an individual is engaged with an extremist group, cause or ideology?	17
C) What do I do if I think an Individual is Vulnerable to Radicalisation or Engaged with an Extremist Group, Cause or Ideology?	18
4. Part C: The Safeguarding Officer & their Responsibilities	20
5. Part D: Monitoring & Reporting of Safeguarding Cases	20
APPENDIX 1: The Legal Framework	21
Children Act 2004	21
Children Act 1989	21
Counter-Terrorism and Security Act 2015	21
Data Protection Act 2018 and UK GDPR	21

Human Rights Act 1998	22
The Sexual Offences Act 2003	22

1. SCOPE

- 1.1 This policy covers the following aspects of Safeguarding at the University College of Osteopathy (UCO):
- Part A: The Safeguarding of Children, Young People and Vulnerable Adults
 - Part B: The Safeguarding against Radicalisation
 - Part C: The Safeguarding Officer & their Responsibilities
 - Part D: Monitoring & Reporting of Safeguarding Cases
- 1.2 The policy covers all the functions and services of the UCO, its Board of Directors, staff and contractors.
- 1.3 Partner institutions are expected to investigate concerns relating to their students and to have appropriate policies for ensuring the safeguarding of partnership students, subject to the agreement between the partner and the UCO.

2. PART A: SAFEGUARDING OF CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

2.1 INTRODUCTION TO PART A

- 2.1.1 The UCO believes that all children, young people and vulnerable adults have the right to be safe, happy and healthy and deserve protection from abuse. The UCO is committed to safeguarding from harm all children, young people and vulnerable adults using any of its services and involved in any of its activities, and to treat them with respect during their dealings with the organisation.
- 2.1.2 Part A of this policy is in respect of the UCO's responsibility towards:
- a) Children and young people (legally defined as any person under the age of 18).
 - b) Vulnerable adults, who are defined, for the purposes of this policy, as anyone over the age of 18 who because of a disability or illness may be in need of community care services and who may be unable to take care of themselves or protect themselves from significant harm or exploitation
 - c) Anyone who is experiencing, or is at risk or neglect, physical, mental or emotional harm.
 - d) Anyone detained by Her Majesty's Government or in contact with probation services.
 - e) Anyone receiving any form of healthcare, including osteopathic treatment.
- 2.1.3 The policy also includes those who are responsible for upholding this policy, including:
- a) employees of the UCO who have dealings with children, young people and vulnerable adults
 - b) UCO employees who, while not required to act in a position of trust, will come into contact with members of these groups on a regular basis during the course of their work

- c) volunteers, students and other workers involved in the provision of UCO services but not employed directly by the UCO.

2.1.4 This policy is based on our responsibilities under the Children Act 2004, specifically Section 11 which places a duty on key people and public bodies, to make arrangements to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children. The Policy also incorporates guidance from the Department for Children, UCOs and Families Working Together to Safeguard Children and Southwark Multi-Agency Code of Practice for the Protection of Vulnerable Adults from Abuse and the London Child Protection Procedures 2011.

2.2 GLOSSARY AND ACRONYMS USED IN PART A OF THE POLICY

2.2.1 **Abuse:** A person may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family, institutional or community setting; by those known to them or, more rarely, by a stranger.

2.2.2 **UCO:** University College of Osteopathy

2.2.3 **Children or Young person:** legally defined as any person under the age of 18, (under 16 if in employment or acting as a volunteer, for instance work experience placements)

2.2.4 **Disclosure and Barring Services Check:** The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

2.2.5 **HR:** Human Resources, referring to those at the UCO

2.2.6 **SMT:** Senior Management Team, responsible for developing the detailed operational plans and supporting strategies to deliver the UCO Strategic Plan.

2.2.7 **Vulnerable Adults:** for the purposes of this policy, as:

- a) Anyone over the age of 18 who because of a disability or illness may be in need of community care services and who may be unable to take care of themselves or protect themselves from significant harm or exploitation.
- b) Anyone who is experiencing, or is at risk or neglect, physical, mental or emotional harm.
- c) Anyone detained by Her Majesty's Government or in contact with probation services.
- d) Anyone receiving any form of healthcare, including osteopathic treatment.

2.3 AIMS OF PART A OF THE POLICY

2.3.1 The aims of Part A of the policy are to:

- a) Clarify the roles and responsibilities of all parties (staff, students and third-party contractors) within this part of the policy.
- b) Support the promotion of a safe working environment and a culture of care in which the rights of all children, young people and vulnerable adults are protected and respected, in line with the organisation's strategic values.

- c) Promote best practice in how employees, students and third-party contractors interact with children, young people and vulnerable adults whilst providing UCO services.
- d) Develop clear guidance, procedures, training and support for those employees and students working with children, young people and vulnerable adults, to ensure that they are aware of these issues, are able to implement them and the information is disseminated freely.
- e) Provide a framework for developing partnerships with appropriate external bodies, e.g. Southwark Safeguarding Children Board, to ensure that the policy continues to reflect legal and best practice requirements in respect of the responsibility of care of children, young people and vulnerable adults.

2.3.2 This policy should also be used in conjunction with the following UCO policies published on the website here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

- a) Disciplinary and Capability Procedure
- b) Grievance Procedure
- c) Public Interest Disclosure (Whistleblowing) Policy
- d) Data Protection Policy
- e) ICT Acceptable Use Policy
- f) Social Media Policy
- g) Dignity at UCO Policy
- h) Codes of Conduct (for Staff and Students)
- i) Health & Safety Policy
- j) Disclosure and Barring Service Policy

2.4 REVIEW

2.4.1 This policy and the guidance will be reviewed annually or whenever there is a change in the related legislation or when an incident occurs. This will help us ensure that these documents are up to date and fit for purpose.

2.5 PART A GUIDANCE FOR STAFF, STUDENTS, VOLUNTEERS AND OTHER RELATED PARTIES

A) WHAT IS ABUSE?

- 2.5.1 Physical abuse 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.
- 2.5.2 Emotional abuse is the persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the victim's emotional development or self-esteem. It may involve conveying to the victim that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of

another person. It may involve age or developmentally inappropriate expectations being imposed, causing the victim frequently to feel frightened, or the exploitation or corruption of children or vulnerable adults. It may involve deprivation of contact, control, coercion, intimidation or harassment.

- 2.5.3 Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the victim is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving the victim in looking at, or in the production of, pornographic material, or encouraging them to behave in sexually inappropriate ways.
- 2.5.4 Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to basic emotional needs. In vulnerable adults this may appear to be as a result of self-neglect but still requires action.
- 2.5.5 Financial abuse is particularly relevant to vulnerable adults and may include theft, fraud, exploitation and pressure in connection with wills, property or inheritance or financial transactions. It may include the misuse or misappropriation of property, possessions or benefits by someone who has been trusted to handle their finances or who has assumed control of their finances by default.

B) WHO IS RESPONSIBLE FOR PROTECTING CHILDREN AND VULNERABLE ADULTS?

- 2.5.6 Responsibility for the implementation of this policy lies at all levels of the organisation.
- 2.5.7 The Board of Directors are responsible for ensuring that the UCO has a policy, which adequately provides protection for children and vulnerable adults in receipt of its services and for the regular review of this policy in the light of changes to legislation or new legislation or regulation.
- 2.5.8 Where the guidance states the employees should report any concerns to their Line Manager, Board Directors should report any concerns to the Chairman of the Board.
- 2.5.9 SMT Responsibilities:
 - a) Identifying those services and posts that are likely to have an involvement with children and vulnerable adults.
 - b) Ensuring that those people appointed by them to the UCO, whose normal duties involve treating, training, supervising or being in sole charge of children or vulnerable adults are screened via the Disclosure and Barring Services process at the appropriate level and are appropriately qualified and/or trained in working with these groups.
 - c) Ensuring that all necessary procedures and practices are in place to provide adequate protection both for the individuals in these groups but also protection for the employees and students involved with them.
 - d) Ensuring that employees, students, volunteers and other third party contractors dealing with these groups are adequately trained and aware of their responsibilities in this area.

- e) Ensuring that carers and/or parents of the children and vulnerable adults are aware that: in providing services, UCO employees and students are not acting in loco parentis.
- f) Ensuring employees, students and others do not work with children or vulnerable adults on regulated activities without a Disclosure and Barring Service (DBS) check.
- g) Ensuring that proper records are kept of any incidents occurring within their service and that these are held securely and/or passed on to Human Resources if the incident involves a member of staff.
- h) Working with other associated agencies to ensure the proper transfer of information relating to dealings with children and vulnerable adults, in line with current legislation, where necessary.

2.5.10 HR Responsibilities:

- a) Working with the SMT in maintaining a record of those posts that are likely to work with children and vulnerable adults and identifying the level of involvement and the appropriate level of screening required.
- b) Ensuring that recruitment procedures are robust and that information pertinent to working with these groups is obtained during the recruitment procedure.
- c) Ensuring that all DBS checks are carried out at the level required in respect of every job identified as working with children and vulnerable adults.
- d) Supporting the SMT in dealing with allegations of abuse or lack of care by staff.
- e) Referring any information about individuals who may pose a risk to the DBS, in line with current legislation.

2.5.11 Employee Responsibilities: All employees and particularly those working with children and vulnerable adults are responsible for:

- a) Ensuring that they are familiar with and understand the policies and procedures relating to their work with or in the vicinity of children and vulnerable adults.
- b) Ensuring that they feel confident in working within this environment and working with their managers to ensure that they have the knowledge and skills to carry out their tasks in this context.
- c) Treating all children and vulnerable adults with whom they come into contact while carrying out their work, equitably and with respect, in line with the UCO's core values.
- d) Reporting to their line manager any concerns they may have about abuse or a lack of care of children and vulnerable adults either from other staff, from students, carers, parents or those in loco parentis or between members of the group.

2.5.12 Students, volunteers, third party contractors and other workers responsibilities:

- a) Working with employees of the UCO, to the same standard, in ensuring the safety and well-being of children and vulnerable adults within their scope.
- b) Participating in any training or development opportunities offered to them to improve their knowledge of skills in this area.

C) WHAT DO I DO IF I THINK A CHILD OR VULNERABLE ADULT IS IN DANGER?

2.5.13 Make a record of your actions using the [Safeguarding Report Form](#) and report it to one of the Safeguarding Officers or send an email to safeguarding@uco.ac.uk.

2.5.14 If you think that a child or vulnerable adult is in immediate danger or that a crime has been committed, contact the police on 999, e.g. if an incident is taking place involving aggressive or abusive behaviour. Otherwise discuss your concerns with a member of the SMT. If you still have concerns, contact:

a) Southwark Social Services Children's Service Duty Protection Co-ordinator: 020 7525 3297

b) Southwark Safeguarding Vulnerable Adults Team: 020 7525 1754

2.5.15 If the consulted member of the SMT does not agree with you that anything further needs to be done but you still have strong concerns that a child or vulnerable adult is in danger you should still contact Southwark Social Services, please see their website for more details:

<https://www.southwark.gov.uk/social-care-and-support>

D) WHAT DO I DO IF A CHILD OR VULNERABLE ADULT DISCLOSES TO ME THAT THEY ARE BEING ABUSED?

2.5.16 Do:

- a) Stay calm.
- b) Listen carefully
- c) Find an appropriate, early opportunity to explain that it is likely that the information will need to be shared, but only with people who need to know and who can help.
- d) Allow the victim to continue at their own pace
- e) Ask questions for clarification only and at all times avoid asking questions that suggest a particular answer.
- f) Reassure the victim that they have done nothing wrong in telling you.
- g) Find out if they are already known to Social Services and if so it would be best to contact someone who already has knowledge of the situation.
- h) Tell them what you will do next and with whom the information will be shared.
- i) After the victim has disclosed, record in writing what was said using the victim's own words as soon as possible. Note the date and time, any names mentioned and to whom the information was given. Ensure the record is signed and dated.
- j) Relay this information as soon as possible to a member of the SMT and/or HR if the incident involves a member of staff.

2.5.17 Do not:

- a) Dismiss the concern
- b) Panic
- c) Allow your shock or distaste to show

- d) Probe for more information than is offered
- e) Make promises you cannot keep: such as agreeing not to tell someone else, keeping secrets
- f) Speculate or make assumptions
- g) Approach or contact the alleged abuser
- h) Make negative comments about the accused person
- i) Pass on the information to anyone other than those with a legitimate “need to know” such as a member of the SMT
- j) Delegate to others as the victim has specifically chosen you to talk to.

2.5.18 Remember that you are not responsible for deciding whether or not abuse has occurred or what the next steps should be. This is the task of the Police and child or adult protection agencies following referral to them.

E) WHAT DO I DO IF I HAVE SUSPICIONS THAT A COLLEAGUE MAY BE ABUSING A CHILD OR VULNERABLE ADULT, OR NOT FOLLOWING GOOD PRACTICE?

2.5.19 Any member of staff who suspects that a colleague may be abusing children or vulnerable adults should act on their suspicions. Action should also be taken if it is felt that colleagues are not following the UCO codes of conduct for dealing with children and vulnerable adults. This action will serve not only to protect children and vulnerable adults, but also colleagues from false accusations.

2.5.20 Write down the details of the incident using the [Safeguarding Report Form](#) or speak to a member of the SMT and/or HR immediately following the incident being reported.

2.5.21 The manager should then take appropriate action to ensure the safety of the child or vulnerable adult and any other people who may be at risk.

2.5.22 The matter should then be discussed with HR, who will then consider whether the matter is an issue relating to poor practice, or to abuse.

2.5.23 If the matter relates to poor practice, procedures relating to misconduct should be followed.

2.5.24 If the matter relates to abuse the matter should be referred to one of the Safeguarding Officers at safeguarding@uco.ac.uk.

2.5.25 The UCO acknowledges that this is an extremely sensitive issue for staff and assures all staff and persons working on its behalf that it will fully support and protect anyone, who in good faith, reports a concern that a colleague is, or may be, abusing a child or vulnerable adult.

F) SHOULD I TELL THE PARENTS/CARERS OF THE CHILD OR VULNERABLE ADULT ABOUT MY CONCERNS?

2.5.26 There is always a commitment to work in partnership with parents/carers where there are concerns about their children or adults in their care and in most circumstances, it would be important to talk to parents/carers to clarify any initial concerns. For example, if a child or vulnerable adult seemed withdrawn, there may be a reasonable explanation; they may have experienced an upset in the family.

2.5.27 BUT if you are suspicious that the parents or carer may be the abuser or you believe that the parent/carer may not be able to respond appropriately to the situation, speaking to them regarding the matter might place the child or vulnerable adult at greater risk. You should report the suspicion to a member of SMT and advice must be sought from Social Services with respect to consulting parents/carers.

G) WHAT INFORMATION SHOULD I RECORD?

2.5.28 In all situations, including those in which the cause for concern arises from a disclosure made in confidence, it is vitally important to record the details of an allegation or reported incident, regardless of whether or not the concerns are shared with a statutory agency.

2.5.29 As far as possible an accurate note should be made of:

- a) The date and time of the incident and disclosure
- b) The parties who were involved
- c) What was said and done by whom
- d) Description of any visible injuries or bruising
- e) Any further action taken by the UCO to investigate the matter
- f) Any further action e.g. the suspension of a worker
- g) Where relevant, reasons why there was no referral to a statutory agency.
- h) The full name of the person/s reporting and whom it was reported to.

2.5.30 The report should be stored securely and shared only with those who need to know. All referrals made to Social Services or the Police, should be confirmed in writing and followed up with a copy of the incident report within 24hrs. Social Services should acknowledge your written referral within one working day of receiving it so if you have not heard back within 3 working days, contact Social Services again.

2.5.31 You should also record the Social Services member of staff to whom concerns were passed and the date and time of the call and subsequent letters sent.

H) WHAT DO I DO IF I AM ASKED FOR INFORMATION BY ANOTHER ORGANISATION?

2.5.32 If the information relates to a child:

- a) The legal principle that 'the welfare of the child is paramount' means that the considerations of confidentiality that might apply to other situations within the UCO should not be allowed to override the right of the child to be protected from harm.
- b) However, every effort should be made to ensure that confidentiality is maintained for all concerned both when the allegation is made and whilst it is being investigated.
- c) The UCO has a duty to share information with other agencies if requested in connection with an assessment of a child's needs under s17 of the Children Act 1989 or an enquiry under s47 of that Act or in connection with court proceedings.

- d) Although the Data Protection Act 2018, UK GDPR, the Human Rights Act 1998 or common law duty of confidence would need to be considered, the welfare of the child would normally override the need to keep the information confidential.

2.5.33 If the information relates to a vulnerable adult:

- a) The same principle as for child protection applies, that the safety and wellbeing of the vulnerable adult overrides considerations of confidentiality.
- b) The legal framework relating to safeguarding vulnerable adults is provided here:
<https://www.scie.org.uk/key-social-care-legislation/safeguarding-adults>
- c) If you are asked by another agency to share information that relates to the assessment of a vulnerable adult, you should comply but again if you have any concerns contact a member of the SMT who will be able to advise you.

l) WHERE CAN I FIND MORE INFORMATION AND USEFUL CONTACTS?

For general information:

Southwark Council Social Services can provide broad advice for general matters:

<https://www.southwark.gov.uk/social-care-and-support>

For Children and Young People:

If you want advice on whether or not a case may need social care involvement, and do not want to disclose an individual's name or details, you can discuss this with the Local Authority Designated Officer at Southwark Council:

<https://www.southwark.gov.uk/childcare-and-parenting/children-s-social-care/child-protection/allegations-against-people-who-work-with-children-in-southwark>

To make a formal referral see:

<https://www.southwark.gov.uk/childcare-and-parenting/children-s-social-care/child-protection/safeguarding-help-and-advice>

The NSPCC website provides advice on keeping children safe and a 24-hour Freephone service for adults, children or young people for advice or to give details about a child who may be at risk Tel: 0808 800 5000 or visit:

<https://www.nspcc.org.uk/>

ChildLine offers a 24-hour freephone for children and young people who need advice (Tel: 0800 1111) and have resources available here:

<https://www.childline.org.uk/>

Family Lives offer a freephone advice line for parents (Tel: 0808 800 2222) and advice:

<https://www.familylives.org.uk/>

London Child Protection Procedures:

www.londoncp.co.uk

For Adult Protection – seeking further advice or guidance

Visit Southwark Council's Safeguarding Adults website:

<https://www.southwark.gov.uk/social-care-and-support/adult-social-care/safeguarding-adults>

The Department of Health and Social Care website has information on vulnerable adults:

<https://www.gov.uk/government/organisations/department-of-health-and-social-care>

The Social Care Institute of Excellence provides information including safeguarding adults:

<https://www.scie.org.uk/safeguarding>

Protection of Vulnerable Adults Scheme (POVA):

<https://www.gov.uk/government/publications/protection-of-vulnerable-adults-scheme-record-retention-and-disposal-policy>

3. PART B: SAFEGUARDING AGAINST RADICALISATION

3.1 INTRODUCTION

- 3.1.1 The UCO is committed to supporting and promoting the welfare of its employees, students, volunteers and other third-party workers (referred to from this point onwards as “students and employees”) and is committed to provide a safe environment conducive to work, study and the enjoyment of a positive experience for all members of its community.
- 3.1.2 This part of the policy sets out the UCO’s approach to these groups within the UCO, especially students at risk of being radicalised and drawn into terrorism in line with Section 26 of the Counter Terrorism and Security Act 2015.

3.2 GLOSSARY & ACRONYMS

- 3.2.1 Radicalization: A process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or undermine contemporary ideas and expressions of freedom of choice.
- 3.2.2 Channel: A programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity.
- 3.2.3 Channel Panel: Channel Panels are chaired by the local authority and works with multi-agency partners to collectively assess the risk to an individual and decide whether an intervention is necessary. If a Channel intervention is required, the Panel works with local partners to develop an appropriate individualised support package which is monitored closely and reviewed regularly by the Channel Panel.

3.3 AIMS OF PART B OF THE POLICY

- 3.3.1 The aims of Part B of the Policy are to:
- a) Clarify the roles and responsibilities of all parties (staff, students and third-party contractors) within this part of the policy.
 - b) To address concerns that may arise where students or employees may be vulnerable to radicalisation where there is an identifiable risk of them being drawn into terrorism.
 - c) Provide guidance about identifying individuals at risk from being radicalized or drawn into terrorism.
 - d) Provide a framework for developing partnerships with appropriate external bodies to ensure that those at risk of radicalization are provided with the necessary support to prevent them from being drawn into terrorism.

3.4 PART B: GUIDANCE FOR STUDENTS AND EMPLOYEES¹

A) HOW DO I IDENTIFY AN INDIVIDUAL AT RISK FROM RADICALISATION?

3.4.1 There is no single way of identifying someone who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include:

- a) Peer pressure.
- b) Influence from other people or via the internet.
- c) Bullying.
- d) Crime against them or their involvement in crime.
- e) Anti-social behaviour.
- f) Family tensions.
- g) Race / hate crime.
- h) Lack of self-esteem or identity.
- i) Personal or political grievances.

B) WHAT ARE THE INDICATORS THAT SUGGEST AN INDIVIDUAL IS ENGAGED WITH AN EXTREMIST GROUP, CAUSE OR IDEOLOGY?

3.4.2 Indicators include:

- a) Spending increasing time in the company of other suspected extremists.
- b) Changing their style of dress or personal appearance to accord with the group.
- c) Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- d) Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- e) Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups).
- f) Attempts to recruit others to the group/cause/ideology.
- g) Communications with others that suggest identification with a group/cause/ideology.

3.4.3 The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason it must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

¹ This guidance is taken from the Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism - Statutory guidance for Channel panel members and partners of local panels: <https://www.gov.uk/government/publications/channel-guidance>

3.4.4 Outward expression of faith, in the absence of any other indicator of vulnerability, is not a reason to assume that an individual is vulnerable to radicalization or engaged with an extremist group, cause or ideology.

3.4.5 Disciplinary Procedures will be implemented if any allegations are made maliciously.

C) WHAT DO I DO IF I THINK AN INDIVIDUAL IS VULNERABLE TO RADICALISATION OR ENGAGED WITH AN EXTREMIST GROUP, CAUSE OR IDEOLOGY?

3.4.6 The following procedure should be followed:

- a) Carefully consider the evidence that has caused you to become concerned and consider how objective it is, i.e. is it based on your instincts, on observation, on hearsay or substantial evidence (e.g. accessing a particular website)? Are there good enough grounds to take further action?
- b) Discuss your concerns with a senior colleague (if staff) or with a tutor (if a student) to evaluate your evidence and the information available.
- c) Consider whether action is needed immediately; if there is immediate risk of violence i) contact the police using either the 101 or 999 phone numbers, and ii) inform the Estates Department on 020 7089 5301 or email Estates@uco.ac.uk.
- d) If the situation is not urgent you should contact one of the Safeguarding Officers to discuss the matter by emailing safeguarding@uco.ac.uk following which you should complete a [Safeguarding Report Form](#) to record your concerns, evidence and discussion with the Safeguarding Officer clearly and concisely.
- e) The Safeguarding Officer, in liaison with the Student Support Team / HR as applicable, shall meet with the individual identified as at risk using the following guidance to gather more information about the situation:
- f) Listen carefully and respond sensitively without expressing an opinion and without imposing your views and values.
- g) Encourage, give lots of time.
- h) Be aware that for a number of reasons disclosing information may be difficult for the individual, such as they may be low in self-confidence / self-esteem; they may have poor communication skills; they may not expect to be believed; there may be a background of threat or coercion; they may be protecting others, including an abuser/radicaliser or other potential victims; their experience may have become a normal reality.
- i) Be honest about needing to tell other people and reassure the individual that you and others will try to keep them involved in the decision-making process.
- j) Keep the details of the conversation and your notes (see above) confidential

3.4.7 Do Not:

- a) Ask direct and invasive questions which may prevent the individual from telling the full story and may trigger trauma symptoms.
- b) Pressurise the individual when asking questions.

- c) Express any shock, disgust or alarm you may personally feel when listening to the individual's story / responses to questions.
 - d) Under any circumstance contact or confront the alleged radicaliser, even if they are known to you or are a student / employee of the UCO.
- 3.4.8 The Safeguarding Officer may contact the UCO's Prevent Lead (Charles Hunt, Vice-Chancellor, charles.hunt@uco.ac.uk), local authority partners, Regional Police Prevent & Channel Lead, the Anti-Terrorist Hotline or Local Policing Team for further advice and shall record this on the [Safeguarding Report Form](#).
- 3.4.9 Based on the information brought to the attention of the Safeguarding Officer, they shall, in liaison with the Student Support Team / HR as applicable:
- a) Inform the vulnerable individual about internal and / or external services as appropriate for the safeguarding issue identified.
 - b) Make an internal referral to the appropriate support service, e.g. Counselling service / student support service.
 - c) Convene a Channel Referral Group consisting of the Safeguarding Officer and two members of the UCO Management Team who have been appropriately trained to recommend and determine whether to refer the matter to the Channel programme; the individual who is the subject of the referral shall be informed of the Panel's decision and the reasons for the decision.
 - d) Make a report to the Police.
- 3.4.10 The UCO reserves the right to take action under its Disciplinary Procedures should it later receive information that suggests that its conduct standards may have been breached. Staff or students who are dismissed from the UCO as a result of safeguarding concerns will be reported to the Disclosure and Barring Service and any relevant professional body.

4. PART C: THE SAFEGUARDING OFFICER & THEIR RESPONSIBILITIES

4.1 The UCO's Safeguarding Officers are:

Name	Role Title	Phone	Email	Room
Francesca Wiggins	Head of Clinical Practice	020 7089 5359	Francesca.Wiggins@uco.ac.uk	UCO Clinic
Jas Verdi	Head of Student Services	020 7089 5318	Jas.Verdi@uco.ac.uk	3.06

4.2 The responsibilities of the Safeguarding Officers are:

- a) To act as a point of contact for safeguarding concerns, receiving information and recording those concerns.
- b) To act upon safeguarding concerns appropriate to the circumstances, e.g. making external referrals to social services or police.
- c) To work as a team on cases and monitor the safeguarding@uco.ac.uk mailbox
- d) To liaise with the Student Support Team and HR appropriate to the circumstances.
- e) To monitor the implementation of this policy and procedure.

5. PART D: MONITORING & REPORTING OF SAFEGUARDING CASES

5.1 The Senior Management Team and Board of Directors shall receive an anonymized annual report of Safeguarding cases to monitor the effectiveness of this policy.

APPENDIX 1: THE LEGAL FRAMEWORK

CHILDREN ACT 2004

Section 10 requires each Local Authority to make arrangements to promote co-operation between the authority, each of the authority's relevant partners (see the table below) and such other persons or bodies, working with children in the local authority's area, as the authority consider appropriate. The arrangements are to be made with a view to improving the well-being of children in the authority's area - which includes protection from harm or neglect alongside other outcomes. This Section of the Children Act 2004 is the legislative basis for children's trust arrangements.

Section 11 requires a range of organisations to make arrangements for ensuring that their functions, and services provided on their behalf, are discharged having regard to the need to safeguard and promote the welfare of children.

CHILDREN ACT 1989

Section 27 places a specific duty on other local authority services i.e. those not directly children's services, and health bodies to co-operate in the interests of children in need.

Under s47, the same agencies are placed under a similar duty to assist local authorities in carrying out enquiries into whether or not a child is at risk of significant harm.

COUNTER-TERRORISM AND SECURITY ACT 2015

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

The Act states that the authorities subject to the provisions include Higher Education Institutions.

DATA PROTECTION ACT 2018 AND UK GDPR

The Data Protection Act 2018 and UK GDPR regulate the handling of personal data including obtaining, recording, storing and disclosing it. The Act requires that personal data be:

- Obtained and processed fairly and lawfully
- Processed for limited purposes and not in any manner incompatible with those purposes
- Accurate and relevant
- Held for no longer than necessary
- Kept secure
- Only disclosed if specific conditions set out in the legislation are satisfied

If you are making a decision to disclose personal data, you must comply with this legislation.

However, this legislation should not be an obstacle if there is a matter of vital or legitimate interests where:

- You have particular concerns about the welfare of a child.
- You disclose information to social services or to another professional; and
- The disclosure is justified under the common law duty of confidentiality².

Consent to disclosure is not always necessary under the data protection legislation which allows for disclosure of information without the consent of the subject in certain circumstances, e.g. where 'special category data' such as personal health information, needs to be disclosed to prevent or detect any unlawful act or is necessary for legal proceedings.

HUMAN RIGHTS ACT 1998

Section 6(1) places a duty on all public authorities to act in a way that is compatible with the rights and freedoms of the European Convention of Human Rights that have been incorporated by the 1998 Act. These convention rights include Article 2 - the right to life, Article 3 – “no one shall be subjected to torture or inhumane or degrading treatment or punishment” and Article 8 – “everyone has the right to respect for his private and family life, his home and his correspondence... There shall be no interference by a public authority with exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, protection of health or morals or for the protection of rights and freedom of others”.

THE SEXUAL OFFENCES ACT 2003

The Sexual Offences Act 2003 was passed with the aim of protecting vulnerable adults and children from sexual abuse and exploitation.

A number of the Act's provisions may be relevant to older people with mental health problems, including:

- the introduction of a number of new offences to protect 'at risk' groups such as people with learning disabilities and other groups with reduced capacity such as people with advanced dementia
- strengthening the Sex Offenders Register to ensure that the location of people who have committed serious sex-related crimes are known to the police
- addressing the fear of sexual crime
- strengthening and clarifying the meaning of 'non-consensual' sex and overhauling the law on consent: the Act introduces a test of 'reasonableness' on consent and a list of circumstances in which it can be presumed that consent was very unlikely to have been given, e.g. when the victim was asleep.

The sections of the Act covering offences committed against those who, because of a very profound mental disorder, lack the capacity to consent to sexual activity may be relevant to older people with a 'mental disorder' who are service users. The Act specifically recognises that whilst the vast majority of people working in the care professions act compassionately, it is clear that some unscrupulous individuals have taken advantage of their position to commit

² <https://www.health-ni.gov.uk/articles/common-law-duty-confidentiality>

a 'breach of a relationship of care' by sexual abuse. It is now an offence for those engaged in providing care, assistance or services to someone with a learning disability or mental disorder to engage in sexual activity with that person whether or not that person has the capacity to consent. However, this does not apply if the sexual relationship pre-dates the relationship of care: for example, where a spouse (or long-term partner) is caring for their partner following the onset of a mental disorder, e.g. dementia, and continues to have a consensual sexual relationship with that person.

Links for the Acts

Children Act 2004:

<http://www.legislation.gov.uk/ukpga/2004/31/contents>

Children Act 1989:

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

Counterterrorism & Security Act 2015:

<http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>

Data Protection Act 2018:

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

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/>

Human Rights Act 1998:

<http://www.legislation.gov.uk/ukpga/1998/42/contents>

Sexual Offences Act 2003:

<http://www.legislation.gov.uk/ukpga/2003/42/contents>