

# Safeguarding and Prevent Policy and Procedure

Safeguarding children, young people, and adults at risk

**Effective from October 2023 to Present** 

## Safeguarding and Prevent Policy and Procedure

### **Purpose of Policy**

UCLan's Safeguarding and Prevent policy and procedure set out UCLan's commitment to providing a safe environment for all in a clear, proportionate and risk-based approach. In doing so, we recognise our statutory, regulatory and moral duties to safeguard the welfare of children, young people and adults at risk from any form of abuse or harm.

### **Document Control:**

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**The Policy and Procedure will be reviewed by:** The Safeguarding, Mental Health and Wellbeing Committee as required following legislative or procedural changes.

**Classification:** This policy and procedure apply to all members of the University community, which includes; governors, colleagues, volunteers, contractors working directly for the University, current and prospective students and apprentices, children and adults at risk engaging in University activities, children and adults at risk living in University accommodation, and external partners where University activities engage children or adults at risk

**Person(s) responsible for policy drafting/ maintenance & review Master Document Controller:** Strategic Safeguarding and Prevent Lead, Operational Safeguarding and Prevent Lead and Principal Safeguarding and Prevent Leads

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**Related policies, procedures, guidance & regulations:** See pages 21 and Appendix 8

Keywords: Safeguarding, Prevent, Harm, Abuse, Wellbeing, Mental Health

**Alternative format:** If you require this document in an alternative format, please email <u>wellbeing@uclan.ac.uk</u>

Enquiries to: Student Services on 01772 893020

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## Summary

### What is Safeguarding?

Protecting children, young people (under 18) and adults at risk from abuse or neglect. In the context of UCLan, this usually means providing a safe environment for them to study, visit and participate in activities; we also have a responsibility to act where we become aware that a child, young person, or adult at risk, is at risk outside of the University.

Safeguarding therefore refers to the actions taken to promote the welfare of children, young people and adults at risk, and the measures we put in place to ensure a person-centred approach, environment and workforce, to minimise the risks of harm or abuse.

The University recognises its duty under the Counter Terrorism Act of 2015 to prevent anyone being drawn into terrorism as part of its Safeguarding responsibility.

#### Who is responsible for Safeguarding?

Everyone has a responsibility to report a Safeguarding concern. This includes colleagues, students, apprentices, visitors, volunteers, agency staff, contractors etc. and applies to any activity organised and/or delivered by UCLan representatives, regardless of where it takes place. However, it is particularly aimed at staff, students and volunteers who are in contact with the following groups through teaching, research, professional services, placements and outreach activities:

- 1. **Children** Those aged under 16
- 2. Young People Those aged 16 to 18
- 3. Adults at risk Someone over the age of 18 years who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves. (Care Act 2014)
- 4. **Adults in a vulnerable situation** An adult may become at risk due to their personal circumstances, a specific incident or situation.

External groups and organisations running activities on our campuses are required to report safeguarding concerns, and work to approved risk assessments and safeguarding policies and procedures.

#### How do I report a Safeguarding concern?

If you feel that a child, young person, or an adult at risk is experiencing, or is at risk of, abuse or harm, you should immediately telephone the Operational/Principal Safeguarding and Prevent Leads by telephoning the Wellbeing Service on 01772 893020. Out of hours please contact the security team on 01772 892068, who will contact relevant colleagues, as appropriate.

#### What happens once I report my concern?

An Operational/Principal Safeguarding and Prevent Lead will talk to you about your concerns and assess what action to take. As this can sometimes be a difficult process, support will be available to you for as long as required afterwards. UCLan Safeguarding Leads will refer into local authorities or other external agencies, as appropriate.

## If you have a safeguarding concern, please refer directly to section E: Reporting Safeguarding Concerns

## **A. Policy Statement**

The University of Central Lancashire (UCLan) is committed to supporting students and apprentices and recognises the importance of health and wellbeing in relation to their academic progress and university experience.

UCLan aims to create an environment in which all members of the University community, including those under the age of 18 and adults at risk, are safe from harm and all forms of prejudice, harassment, discrimination and bullying.

We believe that '**Safeguarding is Everyone's Responsibility'**, and therefore it is essential that everybody in the University understands their safeguarding responsibilities. We embed this approach into our daily practice, and in doing so aim to create a safe culture, with effective early help support mechanisms for reporting and responding to safeguarding concerns, disclosures, and allegations.

The University regards its Prevent duty as part of its wider safeguarding responsibilities and provides support through its Schools and Professional Services Teams. The purpose of this policy is to also demonstrate the University's understanding of the Prevent Duty and its Prevent related responsibilities.

All universities have a duty to take reasonable and necessary steps to ensure that children and adults at risk are safe and that reasonably foreseeable harm does not occur because of careless acts, deliberate acts or omissions of the institution. By taking a risk-based approach to safeguarding, UCLan's work in relation to safeguarding, including contextual safeguarding and suicide prevention, ensures the welfare of our students, apprentices, visitors and colleagues, keeping them safe from harm, as far as possible.

This policy and procedure detail the University's approach to safeguarding children, young people and adults at risk, with information contained in the appendices and on our <u>safeguarding webpages</u> providing further information on processes and procedures.

## **B. Scope of the Policy**

This Policy applies to all members of the University community, which includes governors, colleagues, volunteers, contractors working directly for the University, current and prospective students and apprentices, children and adults at risk engaging in University activities and/or living in university accommodation, and external partners where University activities engage children or adults at risk. Activities may include teaching and research, University-led events, work experience, University-led sports, volunteering, widening participation and outreach activities.

If a safeguarding concern is identified by colleagues, students, apprentices or volunteers whilst on placement, in the workplace or in relation to education delivered by one of UCLan's partner colleges, the host organisation's safeguarding policy and procedures should be followed. If the concern relates to a member of the University community, advice should be sought from the Operational/Principal Safeguarding and Prevent Leads. Although the safeguarding of children, young people and adults who are involved in research is the responsibility of the Principal Investigator or Director of Studies, this policy and procedures must be implemented if anyone becomes of aware of safeguarding concerns within the context of research activity.

## C. What is Safeguarding?

Safeguarding is about protecting children (0-15), young people (16-17) and adults at risk from harm, and ensuring they are provided with safe and effective care. In the context of UCLan, this usually means providing a safe environment for individuals to study, visit and participate in activities; we also have a responsibility to act where we become aware that a child, young person or an adult at risk, is at risk outside of the University.

Children, young people and adults at risk are inherently more vulnerable to all forms of harm, abuse and exploitation, and therefore it is vital that we adopt an approach in which all members of the UCLan community are alert to the possibility of safeguarding issues arising.

Safeguarding is also about protecting individuals from particular groups as they may be more vulnerable, such as those with special educational needs or disabilities, older people, individuals from the LGBTQ+ community or those who become vulnerable due to their circumstances, such as experiencing mental health issues, domestic violence or substance misuse.

Abuse can take place anywhere, including in the person's home, on campus, in university accommodation, on residentials, and in work settings. It can also occur in any relationship and perpetrators of abuse may include a spouse/partner, peers, family members, colleagues, friends, strangers, and people who deliberately seek to exploit vulnerable people.

Abuse and neglect may not be malicious or deliberate, but whatever the reason, a safeguarding referral must be actioned.

**Child/Young Person:** Throughout this document references are made to 'child/children' and 'young person/people'. These terms are used interchangeably and refer to people under the age of 18 years. 'Children' are defined as any young person under the age of 18 within UK law and are therefore recognised as having additional vulnerabilities and requiring of greater protection. The fact that a child has reached 16 years of age, is living independently or is in higher education does not change their status or entitlement to services or protection under the Children Act 1989. Within this policy, the term child relates to anyone aged 0-15 and young person is someone aged 16 or 17.

**Safeguarding Children**: In defining our approach towards children, the University draws on the definition used by the DfE in Keeping Children Safe in Education 2023 (KCSE). While KCSE applies to Schools and Colleges, we will play our part in:

- protecting children from maltreatment.
- preventing impairment of children's mental of physical health or development.
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

Where we become aware of a child or young person experiencing or being at risk of harm or abuse, we will commit to sharing concerns and working together with external agencies, as appropriate.

**Adult at Risk**: The University bases its definition of an 'Adult at Risk' on that used within the Care Act 2014 and defines an Adult at Risk as someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing or is at risk of abuse or neglect; and (iii) as a result

of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

**Adults in vulnerable situations:** Safeguarding in a wider sense involves supporting people who may not be a child or meet the threshold of an adult at risk, but who may still require immediate support to enable them to stay safe.

Adults with capacity have the right to make their own choices, therefore we adhere to the 6 principles of the Care Act, which include; empowerment, protection, prevention, proportionality, partnership, and accountability.

**Contextual Safeguarding** is an approach to understanding and responding to the wider factors and situations that may cause significant harm beyond the family and home. There are many risks that pose a threat to a child or adult's safety that come from their wider environment, which are equally important to consider when identifying safeguarding concerns.

Types of situations from which children, young people and adults at risk should be safeguarded include, but are not limited to:

- Physical, emotional and Sexual abuse
- Spiking
- Neglect/self-neglect
- Organisational abuse
- Stalking
- Domestic abuse
- Financial abuse
- Modern slavery and trafficking
- Discriminatory abuse
- Child sexual exploitation
- Criminal exploitation
- Radicalisation
- Bullying
- Sexual violence and harassment
- 'So called' honour-based abuse
- Forced marriage
- Female Genital Mutilation (FGM)
- Hate Crime

The University recognises that students and apprentices with specific learning difficulties, medical conditions and/or disclosed disabilities may face additional safeguarding challenges both online and offline. As such, the safeguarding team will liaise with the Inclusive Support team and relevant external agencies to identify and respond to any additional barriers that may exist when recognising abuse and neglect.

Further information about these categories of abuse, together with the indications of the possible signs of harm and abuse are detailed in Appendix 6 and on our <u>signs of harm and</u> <u>abuse webpage</u>

Exhibiting any of the signs, symptoms and / or behaviours associated with each category does not always mean there are safeguarding concerns. However, it is important that concerns are checked out and passed onto a Safeguarding Lead, as appropriate. It is not a colleague's responsibility to decide whether a child, young person or adult at risk has been abused or

harmed or subjected to abuse or harm, only to raise concerns that they may have by making a referral.

## D. What is the Prevent Duty?

Section 26 of the <u>Counter-Terrorism and Security Act 2015</u> places a legal duty on "specified authorities", which includes universities, to have "due regard to the need to prevent people from being drawn into terrorism," with guidance available in the form of <u>Statutory guidance</u>: <u>Revised Prevent duty guidance</u>: for England and Wales, this is sometimes referred to as the <u>'Prevent Duty'</u> The University is committed to meeting its duties under the Counter-Terrorism and Security Act 2015 and the UK Government's associated Prevent strategy.

The University is committed to providing support to all members of the UCLan community and recognises that its duty to prevent anyone at risk from being drawn into terrorism is no different to supporting individuals with any other type of safeguarding or welfare need. As such, this policy and procedure applies should there be concerns about an individual who may be at risk of being radicalised or drawn into terrorism.

The Prevent duty relates to pre-criminal activity. It is therefore important to share any concerns regarding the safety and welfare of individuals so that the right support can be offered. Prevent related referrals for support are managed in the same way as all other safeguarding concerns.

The University does not expect individual students, apprentices, or colleagues to identify the reasons behind why someone may need support. Prevent is not about identifying extremism but identifying general behaviour changes that may indicate a need for additional support.

#### **The Channel Panel**

Channel is a safeguarding, multi-agency approach which aims to safeguard, support and protect individuals at risk of radicalisation, extremism or terrorist related activity. It works in the pre-criminal space and with the consent of the vulnerable person and, if appropriate, their parents.

The Channel Panel is chaired by the local authority and can include a variety of statutory partners such as the police, children's services, social services, education professionals and mental health professionals. Together they assess the risk to an individual and decide whether an intervention is necessary, and if so they develop the most appropriate support plan for the individual(s) concerned.

In exceptional circumstances, for example, in cases where there might be a risk of immediate harm to an individual(s) or a third party, the Operational/Principal Safeguarding and Prevent Lead would consult with the Strategic Safeguarding and Prevent Lead about the need for external referrals.

## E. Reporting Safeguarding Concerns

Everyone in the University Community has a responsibility to report a safeguarding concern. It is not their responsibility to investigate or make a judgement as to whether abuse is taking

place, however, there is a responsibility to act on concerns in accordance with this policy and procedure to protect children, young people and adults at risk from harm.

Safeguarding concerns should be reported immediately to the Safeguarding team, so that the appropriate action can be taken to protect the individual and to support the referrer. Whilst anyone can make a referral to the Local Authority or report to the police, at UCLan this is facilitated through the Safeguarding team who will provide appropriate advice, guidance and support.

Anybody reporting a safeguarding concern in good faith will be supported to do so even in the event of that concern subsequently being found to be unsubstantiated.

All concerns relating to the welfare of a child, young person or adult at risk will be taken seriously and responded to proportionately and appropriately. It is important that all allegations are handled correctly, and proper records are kept. For guidance on how to deal with an initial disclosure, please refer to appendix 5, and for details of the categories of concerns, see appendix 6

Any incident which causes concern in respect of a child, young person or adult at risk should be reported immediately to the Operational/Principal Safeguarding and Prevent Leads. On the next page are examples of incidents that are required to be reported:

- There is a concern that a child, young person or adult at risk is, or may be subject to abuse, neglect or harm.
- There is an approach by a child, young person or adult at risk revealing that they are being, or have been, harmed or abused.
- There is a concern that a relationship is developing which may be an abuse of trust.
- There has been a need to physically intervene to prevent a child, young person, or adult at risk from harming themselves or another or from causing significant damage to property.
- There has been a report from a child, young person or adult at risk who is alleging abuse by a colleague, volunteer or a member of an external organisation using UCLan's facilities.
- It becomes apparent, or likely that a child, young person or adult at risk is vulnerable to being drawn into terrorism.

If a safeguarding concern is raised or a disclosure is made regarding a child, young person or adult at risk, then an internal <u>Safeguarding Referral Form</u> should be completed at the earliest opportunity and on the day the concern became known. The individual should be informed that a safeguarding referral has been made and that they will be informed and consulted of any decisions made and actions taken thereafter, where appropriate. During normal office hours, advice and guidance can be sought from one of the Operational/Principal Safeguarding and Prevent Leads by calling +44 (0)1772 893020 or emailing <u>wellbeing@uclan.ac.uk</u>, marking for the attention of the Operational/Principal Safeguarding and Prevent Leads.

The Operational/Principal Safeguarding and Prevent Lead will acknowledge receipt of the referral within 2 working days of receipt and then make decisions regarding the action to be taken, liaising with, and updating the referrer, as appropriate.

**In an emergency** where any person is at risk of immediate harm call 999. Then report to one of our Operational/Principal Safeguarding and Prevent Leads by calling +44 (0)1772 893020.

For out of hours concerns, the security team are available 24 hours a day on +44 (0) 1772 892068 and they will refer the matter to the Student Services on call manager.

For students, apprentices and colleagues, the SafeZone App is available to download and can be used to access support and assistance.

For guidance on how to respond to a concern, see appendix 5, and for guidance about working with children, young people and adults at risk, see appendix 7.

## F. Roles and Responsibilities

The University has an established safeguarding network with clear lines of accountability and responsibility for strategic oversight and operational delivery of this policy and associated procedures.

The overall responsibility for ensuring the implementation of this policy and procedure lies with the University Board and the Vice-Chancellor. The Board and Vice Chancellor authorise the Deputy Chief Executive, in their capacity as Strategic Safeguarding and Prevent Lead, to act on its behalf to ensure that this Procedure is upheld.

The University has a <u>Safeguarding Network</u> led by the Strategic Safeguarding and Prevent Lead. The Operational/Principal Safeguarding and Prevent Leads take on responsibility for being the University Designated Persons for Safeguarding, with the Dean of School or Director of Service taking on the role of Designated Safeguarding Officers, who in turn are supported by Safeguarding Leads in each School and Service.

Those with specific responsibilities, and who form part of the University's Safeguarding Network (Appendix 4), are expected to have read and understood their responsibilities, including but not limited to, attending training, ensuring that appropriate records are kept relating to safeguarding matters and ensuring that local procedures/ arrangements for meeting safeguarding responsibilities are kept up to date and are in line with this policy and procedure.

The University Safeguarding network has specific responsibility to promote good safeguarding practice and ensure that the University has a fit for purpose Safeguarding and Prevent Policy and Procedure that is reviewed at least annually and, if necessary, revised to meet regulatory requirements and best practice.

#### **University Board**

The Board of Governors has overall responsibility for ensuring that University safeguarding policies and procedures are effective and meet statutory requirements and all relevant national guidance.

The Board has ultimate responsibility and accountability. It does so by:

 ensuring we have an institution wide safeguarding culture, where it is understood that safeguarding is everyone's responsibility and that UCLan is a safe place to study, work, visit and undertake activities.

- ensuring appropriate mechanisms are in place to meet statutory safeguarding and Prevent responsibilities;
- undertaking relevant training and receiving assurance that staff are trained to the appropriate levels;
- receiving and considering annual reviews and reports;
- ensuring processes are in place for dealing with allegations of abuse against a member of staff.

#### **Vice-Chancellor's Group**

The Vice-Chancellor's Group (VCG) supports the Board in delivery of its safeguarding agenda, with strategic responsibility delegated to the Deputy Chief Executive as UCLan's Safeguarding Champion (Strategic).

VCG are responsible for:

- providing assurances to the Board that all safeguarding requirements are fully met;
- recommending the Safeguarding and Prevent Policy and Procedure to Board of Governors for approval;
- ensuring the proper implementation and embedding of this policy and procedure across the University, holding people to account in relation to their roles and responsibilities
- submission of reports to the Office for Students (OfS), if deemed to be a reportable event; and
- ensuring adequate resources are in place to enact the requirements of this policy and procedure.

#### Strategic Safeguarding and Prevent Lead

The Deputy Chief Executive is the strategic lead for safeguarding, and is responsible for:

- ensuring safeguarding is afforded the highest priority and sufficiently resourced at the most senior level in the University.
- ensure a robust safeguarding governance structure is in place across the institution, holding regular meetings with the named governor(s) to update on safeguarding matters.
- meeting with the Operational/Principal Safeguarding and Prevent Lead(s) monthly, receiving relevant and timely updates in relation to significant activity to ensure effective strategic oversight and informed decision making.
- undertaking any necessary training required for the role of Strategic Safeguarding and Prevent Lead

#### **Operational Safeguarding and Prevent Lead**

UCLan's Operational Safeguarding and Prevent Lead:

- acts as the main contact and source of support and guidance within the University for safeguarding, liaising with internal and external support services, as appropriate.
- promotes, implements, monitors and reviews the Safeguarding and Prevent Policy and Procedure.
- oversee the framework and acts as the lead for making external safeguarding referrals, including to the local authority, Channel programme, Police and DBS Barring Service.

- maintains detailed, accurate and secure safeguarding records centrally, and shares information appropriately and in line with relevant data protection legislation and regulations.
- attends and play key roles in relevant committees, providing information and data as required and chairing the Safeguarding sub-committee.
- has a sound knowledge of the local, regional and national safeguarding and prevent context;
- shares data, reports, briefings and updates with relevant committees, the safeguarding network and the wider University in relation to safeguarding and Prevent.
- ensures that appropriate and relevant information, advice, training support is readily accessible and compliance with mandatory training.
- establishes and maintain internal and external safeguarding networks, to include LADO, Police, Social Services and local authorities.
- liaises with partner college Designated Safeguarding Leads in relation to any safeguarding or Prevent concerns relating to learners on UCLan directly and indirectly funded courses.
- undertakes training to provide them with the knowledge and skills required to carry out the role effectively.

#### **Principal Safeguarding and Prevent Leads**

UCLan's Principal Safeguarding and Prevent Leads are trained to the same standard of the Operational Safeguarding and Prevent Lead, working alongside and with them in relation to all the responsibilities detailed above. They reside centrally within the Student Services team and oversee the safeguarding framework.

Between the Operational and Principal Safeguarding and Prevent Leads and supported by a wider Student Services on call rota, access to a Safeguarding Lead is available at all times, be that in person, via Teams or telephone.

#### **Designated Safeguarding Officers**

Designated Safeguarding Officers are made up of Deans of School and Directors of Services. They have responsibility for:

- Ensuring that our Safeguarding and Prevent Policy and Procedure is implemented across their areas of work.
- Providing a source of advice, support and communication and act as the safeguarding contact within their area.
- Embedding a strong safeguarding reporting culture.
- Representing Schools and Services on the Safeguarding related committees and groups.
- Providing advice and leadership on signposting within their area, making referrals to the Operational/Principal Safeguarding and Prevent Leads.
- Ensuring that all staff in their teams complete mandatory training. They also identify
  which roles need Enhanced Safeguarding and Prevent training (Level 2), ensuring that
  Safeguarding Leads are appointed within their area and complete the required
- Making sure colleagues in their teams have the knowledge, skills and confidence to follow the Safeguarding and Prevent Policy and Procedure, promoting on school or service agendas that we all have a duty to act if we have cause for concern about the safety and wellbeing of others.

### Safeguarding Leads

Each School and service have nominated Safeguarding Leads whose role is to:

- Act as a source of support and advice when colleagues in the school or service have a safeguarding concern. They facilitate referrals to the Operational and Principal safeguarding leads. They are a point of contact for ongoing cases, keeping detailed and accurate records which are stored securely.
- Ensure any safeguarding concerns which emerge as a result of any University
  procedures are shared with the Operational and Principal safeguarding Leads as soon
  as they become known. For example, fitness to practice, student disciplinary and
  admissions. This is particularly important to ensure any external referrals, are made by
  UCLan, as required. This includes DBS and professional body referrals.
- Work with Deans and Associate Deans to produce course risk assessments for the safe admission to study of students under the age of 18.
- Be particularly alert to the needs of under 18 students and adults who may be potentially at risk, thereby ensuring that colleagues know how to refer for early help.
- Undertake appropriate training, which includes; Safeguarding Essentials, Safeguarding Enhanced, Prevent, suicide prevention and contextual safeguarding courses.

Please refer to Appendix 9 for full details of other roles and responsibilities related to safeguarding, including:

- The People Team
- Colleagues and volunteers
- UCLan students and apprentices
- Employers
- UK partner institutions
- Schools and services that work with children or adults at risk
- Admission and engagement of Under 18's
- Schools offering apprenticeship programmes
- Organisers of activities and events

## **G.** Governance and Oversight

The University has in place a safeguarding governance structure whose purpose is to provide oversight, quality assurance and governance for the University Safeguarding and Prevent Policy and Procedure.

The **Safeguarding Sub-Committee** is chaired by the Operational safeguarding Lead, with representation from across the University and externally. The sub-committee has clear terms of reference, meeting 3 times per year. The purpose of the committee is to ensure safeguarding and Prevent arrangements are effective.

The Safeguarding Sub-Committee reports into the **Safeguarding, Mental Health and Wellbeing Committee** which is chaired by the Pro-Vice Chancellor: Students and Teaching. The Committee has oversight of all safeguarding, mental health and wellbeing related activity, including suicide prevention, sexual violence, domestic abuse and harassment, and the Mental Health Charter. Meeting termly, the committee scrutinise the effectiveness of safeguarding arrangements to ensure they are robust and compliant with statutory and regulatory requirements.

The Safeguarding, Mental Health and Wellbeing Committee report directly into the Academic Board, who in turn report to the Vice-Chancellor's Group and University Board, as they have overall responsibility for Safeguarding, which includes Prevent. The Committee provides assurances to VCG and the Board that safeguarding is effective.

## H. Education and Training

UCLan understands that it is important to ensure all members of the UCLan community receive the appropriate level of safeguarding and Prevent training to safeguard the children, young people and adults at risk they work with and themselves.

UCLan has mandated that all colleagues, students and apprentices undertake an online Safeguarding Essentials (Level 1) course which includes Prevent duty awareness. Completion of this mandated training is on an annual refresher basis, with individuals directed to the University's Safeguarding and Prevent Policy and Procedure and related <u>webpages</u> during their induction. A copy of training records will be maintained and available for review by the Operational and Principal Safeguarding Leads.

The level of training is dependent upon a person's position and role within the University and is delivered face to face and/or online. Those with specific safeguarding roles and responsibilities are provided with enhanced training and continuing support to ensure that they are competent and confident to undertake these important roles. Specialist support is also available to them (and any colleague involved in a safeguarding case).

- Level 1 Safeguarding Essentials online training. The course, which includes Prevent, is mandatory for colleagues and apprentices, and is available via Blackboard and OneFile, and should be undertaken on an annual basis.
- Level 2 Safeguarding Enhanced in-person training. This training is mandatory for those colleagues who hold specific safeguarding responsibilities - are part of the Safeguarding Network, Student Services teams, Security Supervisors and Managers, and those who deliver education/training to children, young people, adults at risk and/or apprentices. It is available via Blackboard and OneFile and should be refreshed every 2 years.
- Level 2 Prevent in Higher Education Enhanced online training. The course, which includes British Values, is mandatory for those colleagues who hold specific safeguarding responsibilities are part of the Safeguarding Network, Student Services teams, Security Managers, and those who deliver education/training to children, young people, adults at risk and/or apprentices. It is available via Blackboard and OneFile and should be refreshed every 2 years.
- Level 3 Safeguarding and Prevent Training Topical, specialist training is available for colleagues based on a range of issues related to safeguarding and Prevent. Training is advertised via the Safeguarding Network, to committee members and via iTrent. Supporting information and resources will also be made available to colleagues.
- Specific/specialist Early Years Safeguarding and Child Protection training at Level
   1, Level 2, and Level 3 for all staff and volunteers in the Pre-school Centre
- Prevent Awareness, Referral and Channel training The government have produced a suite of online training courses aimed at individuals working in sectors covered by the Prevent Duty, which includes Universities. We ask that colleagues on the Safeguarding

Network complete the training, at the required level, to help protect students and apprentices from the risks associated with radicalisation and extremism.

 ACT (Action Counters Terrorism) Awareness e-learning course is available via Blackboard.

The Operational and Principal Safeguarding and Prevent Leads will undertake additional training where it is made available from the DfE, Home Office, Local Authority, Police, and local Prevent Board, for example, as well as Designated Safeguarding Lead Level 3 training.

Further details of staff mandatory and role specific training can be found on the <u>Development Portal</u>

## I. Online Safety, Filtering and Monitoring

To ensure our students and apprentices stay safe online, we use a series of measures including a fully secured network, campaigns and activities and the installation of <u>Ripple</u> software on all PC's.

The University's Policy for the Use of IT Facilities clearly set out what is permitted and prohibited by authorised users, whether colleagues, students, apprentices or researchers. This covers the creation, display, storage or transmission of materials, and includes an exception process for appropriately supervised and lawful research purposes. The University's policies concerning colleague, students and apprentices include specific conditions for the use of corporate and personal websites, social media and any other personal web presence. These policies include the staff handbook, IT Security Policy, Rules for the Use of IT Facilities and disciplinary procedures.

The Strategic Communication policy ensures that administrative control over the University's corporate websites and social media presence is limited to specific, named individuals within both External Relations and the Learning & Information Service.

The IT environment at UCLan is protected through a layered approach to security, which includes; automatic blocking of illegal websites and IP addresses on University networks; automatic checking of websites for malicious content and removal before displaying the "safe" web page content and automatic removal of malware, viruses, bots and other malicious content from internal and external network traffic. All University-managed network devices – computers, laptops, tablets and so on – are also configured with additional protection that analyses web pages and file downloads and checks against a continuously updated list of known phishing and malicious software sites. If it finds a match it displays a warning page, giving users an opportunity to provide feedback and advising to continue with caution.

The University's 24/7/365 Cyber Security Operations Centre, managed and provided by an external security partner, continues to provide advanced monitoring, detection and response capability to a wide range of cyber security threats to our institution and its community.

Identification of any breach of the IT policy can be reported on in a number of ways; colleagues, apprentices and students, People Team, our internet service provider, or through routine reporting on system and user activity.

The status and development of University IT Security is managed by the IT Security Management Group, which reports to the University's Information & Data Governance Group (IDGG). The IDGG is chaired by a member of the Vice Chancellor's Group and includes

representatives across the University. The approach to filtering and monitoring is reviewed annually by the IDGG.

## J. Communications

It is expected that all members of the University Community will be aware, through effective communication of the Safeguarding and Prevent Policy and Procedure and associated training, of systems which support safeguarding and how to recognise and respond appropriately to safeguarding concerns.

A range of student, colleague and external facing channels are used to communicate messages and embed a safeguarding and reporting culture at the University. This is complemented by clearly signposted wellbeing support which is publicised through regular campus wide communications to ensure individuals are aware of how they can access the support available at UCLan, and to encourage them to do so.

The University does not permit material supporting terrorism to be displayed within University premises and will remove any such material if it is found. Likewise, we will seek to ensure that the University's printed and electronic communications (including the University website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

## K. Volunteers, Visitors and External Speakers

The University is committed to academic freedom, freedom of speech and social cohesion on all its campuses and, through its <u>Designated Events Procedure</u> and Code of Practice to Ensure Freedom of Speech, seeks to ensure that University events or events on University premises are managed in accordance with our core values of equality, respect and tolerance, whilst ensuring our statutory duties are met and events proceed safely and lawfully.

The Designated Events Procedure must be followed by all staff, students and learners who wish to hold an event which is deemed to be a designated event and approval for the event must be sought in advance in accordance with the Procedure by completing the <u>Designated</u> <u>Events Notification Form</u>.

All UCLan events held on, and off campus must be risk assessed.

If colleagues are planning to host an event (physical or virtual) or guest speaker on campus, they must follow the guidance available on the intranet - <u>Organising an event on campus</u> and <u>event safety, health and security procedures</u>.

Registering events helps to reduce the risk of events not following correct procedures and guidelines, prevent event clashes and ensure key departments are involved and aware from the beginning.

## L. Students' Union

The University recognises that the Students' Union plays an important role in safeguarding, including protecting against radicalisation, by 'looking out' for fellow students, reporting extreme behaviour and contributing to the development of University policies.

The Students' Union and affiliated clubs and societies are governed by their own published policies and guidelines in accordance with its status as a registered charity and as managed by their Board of Trustees. The University works closely with the SU on all matters as part of our shared commitment. The approach we have taken to Prevent, under the umbrella of safeguarding, has meant that we have developed frameworks and practices which support students, apprentices and colleagues when concerns are raised.

The Students' Union are engaged in discussions around safeguarding and the Prevent Duty. Both the President and Chief Executive Officer are members of the Safeguarding Committees.

Staff who are employed by the Students' Union and students or apprentices who are inviting external speakers for events related to Students' Union activities, clubs and societies should follow the UCLan Students' Union Guest speaker process.

The Students' Union's permanent staff and elected officers access the University's Level 1 Safeguarding Essentials on-line course and are invited to attend key safeguarding workshops to strengthen collaborative working and understanding of the safeguarding agenda at UCLan, and they are aware of how to refer students and apprentices for support.

UCLAN Students' Union also operates a third-party reporting centre for hate crimes and incidents.

## **M. Safer Recruitment**

Safer recruitment is central to the safeguarding of children, young people and adults at risk. UCLAN will apply Safer Recruitment processes to all work within regulated activity areas which employs staff or volunteers to work with children, young people and adults at risk, and have a duty to safeguard and promote their welfare. This includes ensuring that for these regulated areas, the University adopts safer recruitment and selection procedures which prevent unsuitable persons from gaining access to children.

Where colleagues or students are involved in regulated activity with children, young people or adults at risk, then the relevant DBS checks are undertaken by People Team.

The Safer Recruitment Guidance for the University of Central Lancashire is based on <u>Keeping</u> <u>children safe in education 2023</u> (KCSIE) guidance and best practice, and aims to promote consistent practice across the University, this includes:

- A policy statement detailing everyone's responsibility and outlining our commitment to safeguarding and promoting of the welfare of children, young people and adults at risk, which it is expected ALL colleagues and volunteers will share.
- Safer practice in recruitment including planning and advertising, job descriptions and person specifications making reference to the regulated activity work, if applicable.
- Our application forms allowing for full information to be collected to deter unsuitable applicants.
- Full scrutiny during shortlisting including identifying gaps in employment and employment inconsistencies.
- References obtained and verified.
- Interviews undertaken by a panel, with safeguarding questions asked, gaps in employment explored.
- Conditional offer of appointments subject to safeguarding checks completed.

- Disclosure and barring checks undertaken at the correct level, where relevant.
- Checks on overseas staff carried out.
- Right to work and ID checks obtained.
- Professional qualifications checks carried out, if needed for the role.
- Prohibition from teaching checks undertaken for these carrying out teaching work as defined in KCSIE.
- Appropriate medical checks undertaken.
- Information stored within a single central record.

UCLan's People Team leads on arrangements for DBS checks for those posts which are eligible for such a check. Whilst the DBS potentially provides additional safeguards, it is important to remember that it is part of a wider framework of safe recruitment and selection practices. It does not replace the need for on-going vigilance in matters concerning safeguarding. Nor does it remove the need for UCLan to maintain robust recruitment procedures including, where necessary, checking identity, qualifications, taking up references which indicate an individual's suitability to work with children, young or vulnerable people, and enquiring into career history.

All UCLan students who are employed by UCLan to work with children, young people and adults at risk, and whose posts have been risk-assessed and eligible for DBS checks, will be subject to those checks and safe recruitment (or deployment if volunteering) processes. Any student employed to work with children, young people or adults at risk on activities is required to complete a self-disclosure whilst awaiting DBS checks.

Contractors who are engaged in regulated activities relating to children and adults at risk on behalf of the University are required to conduct relevant DBS checks in accordance with the requirements of the Safeguarding Vulnerable Groups Act (SVGA) and otherwise to comply with the vetting and reporting requirements of the SVGA. All contractors on UCLan premises are expected to follow the Safeguarding and Prevent Policy and Procedure

Further information is available at: <u>Recruitment and Selection (sharepoint.com)</u> and <u>Disclosure</u> and <u>Barring Service (DBS) Checks (sharepoint.com)</u>

## N. Allegations or suspicion of abuse

The University will ensure that all allegations are dealt with appropriately, liaising with external agencies, such as the Local Authority Designated Officer (LADO), Position of Trust Lead, Police, Social Care and the DBS Barring Service, as required.

Any concern or allegation against a colleague, volunteer or contractor working with children or adults at risk should be reported immediately and without delay to the Operational/Principal Safeguarding and Prevent Leads. They will ensure that the welfare of the child, young person or adult of risk is the primary concern throughout any processes which may follow, whilst also ensuring support is provided for the reported party.

Following initial assessment, the Operational/Principal Safeguarding and Prevent Lead will seek advice from the LADO, the relevant agency's Position of Trust Lead (or equivalent), and/or Police at the earliest opportunity, following any advice provided. Conversely, the external services may alert the Operational/Principal Safeguarding and Prevent Leads of concerns that they become aware of.

The Operational/Principal Safeguarding and Prevent Lead will ensure the management of any allegation is consistent with guidance from the Children's Safeguarding Assurance Partnership and/or Safeguarding Adults Board (Managing concerns around people in a position of trust (PiPoT)). Together with the Safeguarding Lead in the People Team, the Operational/Principal Safeguarding and Prevent Lead will advise the Strategic Safeguarding and Prevent Lead, and relevant Dean or Service Director.

If a child, young person or adult at risk reports abuse by an employee of an external organisation whilst engaged in any UCLan activity, a referral must be made to the Operational/Principal Safeguarding and Prevent Leads. Following the outcome of any related investigation, the Operational/Principal Safeguarding and Prevent Lead will consider with appropriate senior management whether the external organisation should be permitted to continue using UCLan's premises and facilities

Schools, and therefore students and apprentices, at UCLan are involved in professionally regulated provision with oversight by professional regulatory bodies. As such, they will have additional responsibility for the safeguarding arrangements in their Schools and must recognise and respond appropriately to the employment context (and handling of disciplinary procedures), as per their existing procedures and regulatory body.

The People Team may need to consider whether, if after the initial assessment, where the Operational/Principal Safeguarding and Prevent Lead **does not** consider that the matter constitutes a safeguarding allegation, a review of information should be undertaken by the People Team to ascertain if an internal investigation is required to determine if the behaviour/incident was related to poor practice or misconduct (refer to <u>Disciplinary</u> <u>Procedure.docx (sharepoint.com)</u> and <u>Dismissal Procedure.docx (sharepoint.com)</u>

#### Low level concerns

Low level concerns take many forms are not insignificant, no matter how small. Low level concerns could involve being over friendly with students or apprentices, use of inappropriate use of language, sharing personal contact details, or making contact during unsociable hours.

It is important not to dismiss or ignore low-level concerns, but to share them with a Safeguarding Lead so that they can be recorded, and consideration given to what, if any, action is required.

The University is committed to working towards creating a climate in which everyone is treated fairly with dignity and respect and will ensure that should anyone feel they have been subject to, or another person is displaying, inappropriate behaviours, this can be reported and will be taken seriously. For further information refer to <u>Grievance Procedure.docx (sharepoint.com)</u>, <u>Dignity at Work.docx (sharepoint.com, Harassment Policy.docx (sharepoint.com)</u>, <u>Equal</u> <u>Opportunities Policy.docx (sharepoint.com)</u>

#### Referral to the Disclosure and Barring Service (DBS)

The Operational/Principal Safeguarding and Prevent Leads, in consultation with the Safeguarding Lead in the People Team, will make a referral to the DBS as soon as the University removes an individual (student, apprentice or colleague) from undertaking regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children, young people and/or adults, and/or;
- satisfied the harm test in relation to children, young people and/or vulnerable adults, and/or;
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

In such cases, the Operational/Principal Safeguarding and Prevent Lead will also complete and submit a Management of Allegations Outcome Record to the relevant LADO.

## O. Legal Framework

The approach taken by UCLan has been informed by a wide range of external policies and guidance and seeks to reflect general safeguarding guidance and good practice relating to the higher education sector.

Universities are subject to a general duty of care to deliver educational and pastoral/wider services to the standard of the ordinarily competent institution, and, in carrying out such services, to act reasonably to protect the health, safety and welfare of its students and not to cause harm by its own actions.

## **Relevant Legislation and Guidance includes:**

- Children Act 1989 and 2004
- Counter-Terrorism and Security Act 2015
- Data Protection Act 1998
- DBS Code of Practice November 2015
- DfE (2017) Child sexual exploitation
- DfE (2018) Information sharing
- Domestic Abuse Act (2021)
- Equality Act 2010
- Female Genital Mutilation Act (2003)
- Home Office Guidance Prevent Duty Guidance
- Human Rights Act 1998
- Keeping Children Safe in Education 2023
- LCC Local Safeguarding Children Board Policy and Procedures
- LCC Safeguarding Adults Board Policy and Procedures
- Mental Capacity Act 2005
- No Secrets 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- The Care Act 2014
- The Children and Social Work Act 2017
- The Education Act (2002) Section 175
- UN Convention on the Rights of the Child 1989
- What to do if you're worried a child is being abused advice for Practitioners
- Working Together to Safeguard Children (2018)

Any relevant amendments to legislation and guidance will be considered as part of the annual policy review.

UCLan policies and guidance that support the University's commitment to safeguarding are available in appendix 8.

## P. Equality, Diversity, and Inclusion ("EDI")

UCLan is committed to creating an inclusive culture that values diversity, as set out in our EDI strategy, Belonging at UCLan. This Safeguarding and Prevent Policy and Procedure applies to everyone covered within its scope regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, background or any other characteristic. In line with our duties under the Equality Act 2010, when fulfilling their roles and responsibilities in relation to this policy and procedure, the relevant people (set out in Section I) will consider the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster or encourage good relations

## **Q. Privacy Statement**

This Safeguarding and Prevent Policy and Procedure and associated procedures will enable the University to promote a consistent approach and allow informed decision making to take place to effectively support the safeguarding of children, young people and adults at risk.

In doing so, the University recognises the importance of proactive information sharing between professionals and external agencies to identify concerns and provide early help for children, young people and adults at risk, promote welfare and prevent concerns from escalating. In implementing this policy and associated safeguarding procedures and practices, UCLan will ensure that any personal data relating to the application of this policy and procedure will be obtained, processed and destroyed in line with the principles outlined in the data protection legislation (the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA)) which sets out how we should handle personal information.

The University may need to share personal data to ensure, for example, that a person in need of early help is given appropriate support. Information sharing will be assessed on a case-bycase basis and will only be shared where legally permitted. In sharing such information, the University will only share sufficient and relevant information to allow the concern to be appropriately followed up.

The University will undertake to be transparent from the outset with the individual(s) concerned (and/or their family where appropriate) about why, what, how and with whom the information could be shared, unless deemed unsafe to do so or where there is a legal restriction.

For further information about our Privacy Notices, please see our Privacy notices - UCLan

## **R. Breaches of this Policy and Procedure**

All members of the UCLan community should be aware of and follow UCLan's safeguarding and Prevent Policy and associated procedures and be confident that where concerns are raised about poor or unsafe practice they will be taken seriously.

Should an individual be found to be in breach of this policy and related procedures, the University will investigate the matter and take action as necessary through relevant disciplinary procedures.

If there is a concern that the Safeguarding and Prevent Policy and Procedure is not being followed correctly, in the first instance advice should be sought from the Operational/Principal Safeguarding and Prevent Lead or Safeguarding Lead within the respective area of work or study.

Where an individual feels unable to raise an issue with a Safeguarding Lead, or feels that their concern has not been properly addressed, they should refer to the University's <u>Public Interest</u> <u>Disclosure Policy</u>.

The Operational/Principal Safeguarding and Prevent Lead will report any breaches of the Safeguarding and Prevent Policy and Procedure to the Strategic Safeguarding and Prevent Lead and to the Safeguarding, Mental Health and Wellbeing Committee.

## S. Risk Management

Prior to any activity involving children, young people, or adults at risk, it is the responsibility of the nominated lead to complete a risk assessment, which should be signed off by the appropriate senior manager. As appropriate to the activity, risk assessments should include consideration of safe working practices, supervision ratios, health and safety, parental consent, online safety, transport, accommodation, drop-off and collection arrangements, safe recruitment, and DBS. The appropriate level of safeguarding training and DBS checks should be undertaken by all those involved in leading and delivering such activities.

In order to protect children, young people and adults at risk, the University uses a consistent risk assessment approach and documentation to assess individual safeguarding cases and determine what interim precautionary measures may be required when reports are received that suggest a risk of harm.

Pending investigation (internal and/or external), risk analysis is undertaken, without prejudice, by appropriately trained representatives from relevant professional services and Schools. The purpose is to identify actions which may help to mitigate risk, enable continued engagement in learning, protect others and ensure that the right support is provided for the reporting and reported parties and colleagues, as appropriate.

It may be that referrals are made into other internal processes (Support to Study, Fitness to Practice, Disciplinary, for example) or to partner agencies (LADO, Social Services, Police, for example) as part of the risk management process, and in line with our Privacy Notice. Support via the Counselling, Mental Health and Wellbeing Team or People Team, as applicable, will be provided throughout any process, as appropriate.

All risk assessments will be reviewed and updated periodically to consider new information, monitor progress and ensure that any actions/risk mitigations are still relevant and proportionate.

In relation to the University's responsibility under the Prevent duty, using the University's template for assessing risk, a Prevent risk assessment and action plan has been completed. Where any significant risk is identified, the University considers mitigating actions that will

reduce the impact and/or likelihood. On an annual basis, the risk assessment and action plan are reviewed and reported to the Governing Body.

## T. Monitoring and Compliance

The Principal and Operational Safeguarding Leads meet weekly to address compliance and monitor cases, with the Principal Safeguarding Lead meeting with the Strategic Safeguarding and Prevent Lead on a monthly basis to share information and review the effectiveness of, and compliance with, this policy and procedure.

This Safeguarding and Prevent Policy and Procedure will be monitored and evaluated on an annual basis by the Safeguarding Sub-Committee and Safeguarding, Mental Health and Wellbeing Committee to ensure it remains up to date in terms of legislation, local and national guidance, whilst also reflecting learning from practice and any significant incident or concern.

The Safeguarding Sub-Committee and Safeguarding Mental Health and Wellbeing Committee meet three times per year to review and update policies and procedures, risk assessments, and reports. Alongside a presentation, an annual report is produced that is presented to VCG and the Board.

The University will comply with Ofsted inspection requirements by ensuring that safeguarding is included in the annual self-assessment and relevant documents and procedures are available for inspection.

The OfS has responsibility as monitoring authority of the Prevent Duty in the higher education sector, as set out in the Counter Terrorism and Security Act 2015 (CTSA). The University has separate, established procedures for reporting on such matters - the University's strategic lead for compliance with the Prevent Duty is Ruth Connor, Deputy Chief Executive Officer. This does not negate the requirement for the University to report matters relating to our compliance with the Prevent duty through the reportable events process. Serious incidents of this nature are reviewed in accordance with the OfS Prevent-related serious incidents guidance note.

#### The University follows the <u>Prevent-related serious incident guidance</u>

(officeforstudents.org.uk) to determine what constitutes a Prevent-related serious incident which should be reported to the Office for Students (OfS), providing assurances that risks have been mitigated where appropriate, when concerns related to Prevent have been identified. In line with this guidance, the University reports to the OfS any incidents or developments which:

- have led to the review and substantive revision of Prevent-related policies
- have caused reputational harm or harm to staff and students
- could be reasonably perceived as being related to Prevent.

Actual or suspected Prevent-related incidents must be reported no later than five days after the incident occurring or being identified, with immediate action taken to mitigate further risks and to limit further damage. Reportable incidents do not include 'business as usual' events linked to responsibilities under Prevent, for example, formal Channel referrals, or informal contact with the police or local Prevent partners. In line with the <u>Prevent duty monitoring framework (officeforstudents.org.uk)</u>, each Higher Education Institution must submit an accountability and data return to the OfS by 1 December each year stating what it has done over the previous year to ensure that the duty is implemented. Following assessment of this report OfS writes back to the University to advise that in its opinion, the University does or does not have due regard to the need to prevent individuals from being drawn into terrorism. After the submission of its most recent annual report, the University was deemed by OfS to have due regard to the need to prevent individuals from being drawn into terrorism.

## **Appendix 1 - Definitions**

**Apprentice**: All learners who are registered on one of the University's apprenticeship programmes.

**Children's Social Care** has the statutory duty to ensure the welfare of children and to work with the CSAP - Children's Safeguarding Assurance Partnership to comply with its procedures. When a safeguarding referral is made, Children's Social Care has a legal responsibility to make enquires where a child who lives or is found in their area is considered to be at risk of, or actually suffering from, significant harm. This may involve talking to the child and family and gathering information from other people who know the child. Enquires may be carried out jointly with the Police where a crime has been alleged. If action needs to be taken urgently and out of office hours, then the Police will deal with the enquiry sensitively and effectively. Children's Social Care will link in closely with their respective CSAP and cross-reference the guidance produced by the CSAP. Children's Social Care are a very important source of advice and support.

**Colleague**: Paid University staff whether working on a permanent or temporary contract.

**Contractor:** Employed by third party organisations to carry out work on behalf of the University. It is the responsibility of the contractor's employer to ensure that all necessary employment and safeguarding suitability checks are completed and to provide assurance to the University that this has been done.

**DBS:** DBS is an acronym for the Disclosure and Barring Service. A DBS check is a criminal record check that individuals and employers can request to ensure that employers are making the right decisions during the recruitment process.

**LADO (Local Authority Designated Officer):** In accordance with statutory guidance, every Local Authority must have a LADO who is responsible for providing advice, liaison and monitoring the progress of cases where allegations have been made against people who work with children. The LADO should be informed directly, or via Children or Adult Social Care/the Police if they are involved, of all allegations that come to UCLan's attention where it is alleged that a person who works with children or adults at risk has:

- Behaved in a way that has harmed, or may have harmed, a child/ vulnerable adult; or
- Possibly committed a criminal offence against children/adults at risk; or adults at risk
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

This applies to paid and unpaid roles, volunteers, casual, agency or self-employed roles and captures concerns/allegations/offences emanating from outside of work as well as within the workplace. The LADO is involved from initial phase to conclusion and provides advice and guidance, helping to determine that the allegation sits within the scope of the procedures. The LADO helps co-ordinate information sharing with the right people- key role in making linkages. They monitor and track any investigation in the expectation that it will be resolved as quickly as possible.

**PiPoT Lead (Persons in a Position of Trust):** The Local Authority PiPoT Lead should be contacted in relation to adult cases of professional abuse.

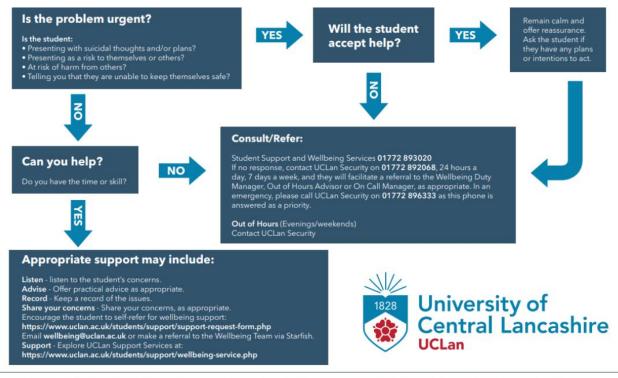
**Regulated Activity:** A term used to describe certain functions that are carried out by an individual as part of their role that would require them to have an Enhanced DBS Check with a check against the relevant barred lists. Regulated activity with children takes into account the person's role and the setting, whereas regulated activity with adults focuses on specific activities that are provided for an adult that requires them.

**Student**: All students registered with the University, including those based in partner colleges. **University Community**: Includes colleagues, students, apprentices, prospective students, alumni, visitors, volunteers and contractors.

**Volunteer**: Individuals who may lead or support University-led activities for which they are not paid.

## **Appendix 2 - Wellbeing Emergency Flowchart**

## **Student Wellbeing Emergency**



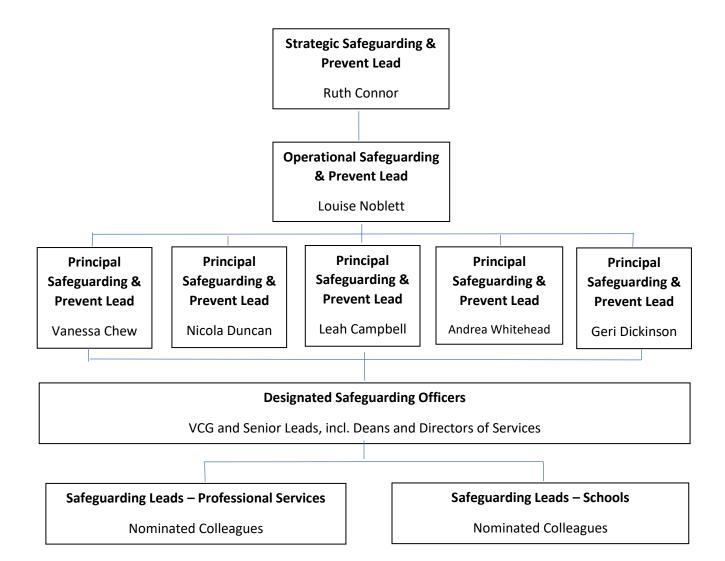
Supporting your Students' Mental Health & Wellbeing Toolkit: The aim of this toolkit is to help you as UCLan staff to better understand the different difficulties your students may present with and what you can do to help them. Visit: https://msuclanac.sharepoint.com/sites/SupportingyourStudentsMentalHealthWellbeing to access a range of resources on Mental Health, Wellbeing, Counselling, Inclusive Support and Financial Support.

## **Appendix 3 - UCLan Safeguarding Referral Form**

The Safeguarding Referral Form is now available via UCLan's Safeguarding Webpages

## **Appendix 4 - Safeguarding Leads Network**

#### Details of members of the safeguarding network are available <u>on SharePoint</u>



## Appendix 5 - How to respond to a concern

If a child, young person or adult at risk says or indicates that there is a possible safeguarding concern, or a member of staff receives information suggesting there may be a safeguarding concern, **the person receiving this information should:** 

- Seek advice from the Operational and Principal safeguarding Leads without delaythis must always be a same day discussion.
- Ensure the immediate safety of the child, young person or adult at risk
- If the child, young person or adult at risk needs immediate medical treatment, telephone Security and ask them to call for an ambulance, informing the call centre that that this is a safeguarding issue
- Not promise to keep secrets and remind the child, young person or vulnerable adult of the limits to confidentiality
- React in a calm and considered way so as not to frighten or deter the child, young person or adult at risk
- If appropriate, reassure the child, young person or adult at risk he/she is not to blame for what has happened and that he/she was right to share this information
- Take what the child, young person or vulnerable adult says seriously, recognising the difficulties inherent in interpreting what is said by a child, young person or vulnerable adult who has speech disability and/or differences in communication or language
- Keep any questions to the minimum required to clarify the concern and ensure a clear and accurate understanding of what has been said. Only use open questions.
- Do not ask leading questions or make suggestions about what may have happened
- Listen without interrupting if the child, young person or vulnerable adult is recounting significant events
- Reassure the child, young person or vulnerable adult and tell them what you will do next

Ideally, where the child, young person or adult at risk has made a disclosure, a verbatim record of their account of what occurred in their own words should be recorded and should include details of the nature of the allegation or concern, a description of any injury (you must not remove clothing to inspect any injuries or take photographs), times, dates, places and any other details. Do not worry if you feel you have missed something - refer to the Operational and Principal safeguarding Leads who will pick up further questions/actions.

The person receiving the disclosure or information should **NOT**:

- Panic or allow any shock or negative response to show
- Make promises of confidentiality but explain that they will need to pass on this information to those who need to know
- Show disbelief or fail to take the allegations seriously
- Ask questions other than to clarify that they have enough information to act
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Approach the alleged abuser
- Make promises or agree to keep secrets
- Fail to take responsibility for reporting the concern

## **Appendix 6 - Categories of Concern**

**Child Abuse:** Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger.

**Physical Abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

**Emotional Abuse:** Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food or clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or unresponsiveness to, a child's basic emotional needs.

**Child on Child/Peer on Peer Abuse:** Children and young people can abuse other children or young people. According to the <u>Safeguarding Network</u>, this form of abuse is when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised, and between children/young people both on and offline.

**Consent:** A person consents if they agree by choice and have the *freedom* and *capacity* to make that choice to engage in a sexual activity. Consent must be freely given, reversible, informed, enthusiastic, and specific. Consent can be withdrawn at any time. The age of consent is 16 and children under the age of 13 cannot give consent to any sexual activity.

**Sexual Violence -** Sexual violence is any sexual conduct that a person does not consent to. It involves all unwanted sexual contact including kissing, groping, rape and enforced sexual acts.

As defined by the Sexual Offences Act 2003, for the purposes of this policy and procedure we have used the following definitions:

**Rape** - A person (A) commits an offence if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

**Assault by penetration** - A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents

**Sexual Assault** - A person (A) commits an offence if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

**Sexual Harassment:** The Equality and Human Rights Commission defines sexual harassment in this context as unwanted behaviour of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

**Stalking:** As defined by the Crown Prosecution Service, 'a pattern of unwanted, fixated and obsessive behaviour which is intrusive. It can include harassment that amounts to stalking or stalking that causes fear of violence or serious alarm or distress in the victim

**Hazing:** Associated with the initiation to, admission or ongoing membership of a group, hazing is any behaviour or activity that endangers the physical and/or mental health or safety of an individual and is intended to humiliate or degrade.

**Upskirting:** A highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) and is a criminal office under the Voyeurism (Offences) Act 2019.

**Peer on peer:** This form of abuse is when there is any kind of physical, sexual, emotional, or financial abuse or coercive control exercised between children/young people both on and offline.

**Self-neglect:** Self-neglect is an extreme lack of self-care; it is sometimes associated with hoarding and may be a result of other issues such as addictions

**Domestic abuse:** Domestic abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behavior, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member.

**Financial abuse:** Financial abuse is a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused. (Ann Craft Trust)

**Modern slavery and trafficking:** Modern day slavery is when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage. Trafficking is the use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.

**Discriminatory abuse:** Discriminatory abuse is the unequal treatment of an individual based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (Devon Safeguarding Adults Partnership). Discriminatory abuse can include suffering insulting language, harassment or ill-treatment due to these personal characteristics.

**Child sexual exploitation:** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Criminal exploitation:** Criminal exploitation is the manipulation, coercion control of individuals to commit crimes usually for the benefit of other abusive adults or peers.

**Cuckooing:** Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. It takes the name from cuckoos who take over the nests of other birds. There are different types of cuckooing: Using the property to deal, store or take drugs, to store weapons, use as a place to live, to financially abuse the tenant, or to sex work.

**Radicalisation:** Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm

**Bullying:** Bullying is an ongoing and deliberate misuse of power in relationships through repeated verbal, physical and/or social behaviour that intends to cause physical, social and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening

**'So called' honour-based abuse:** Honour Based Abuse is a broad umbrella term used to describe a combination of practices used principally to control and punish the behaviour of a member of a family or social group, in order to protect perceived cultural and religious beliefs in the name of 'honour'. Although predominantly associated with women and girls, male members of a family can also be victims. Violence and abuse may occur when it is felt that an individual's behaviour has broken the 'honour code', bringing disgrace to their family or social group. Perpetrators will feel that they need to restore their loss of face and standing within their community. There is often an element of approval and social acceptance from other family members and the community.

**Forced marriage:** A forced marriage is where one or both people do not (or cannot e.g. some people with learning difficulties or mental and physical disabilities) consent to the marriage, and then face coercion through honor based abuse/violence such as emotional pressure and/or physical abuse which can involve being held captive, assaulted, harassed, raped, drugged, emotionally blackmailed etc.

**Female Genital Mutilation (FGM):** Female Genital Mutilation (FGM), involves procedures that include the partial or total removal of the external female genitalia or other injury to the female genital organs. It is often referred to as 'female genital cutting', circumcision, or simply 'cutting' or 'initiation'. It is carried out for cultural, religious or other non-therapeutic reasons. Cases of FGM in under 18's must be reported to the police.

**Hate Crime:** A hate crime is defined as 'Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.'

**Spiking:** Spiking is when someone puts alcohol or drugs into another person's drink or body without their consent or knowledge. People can also be a victim of 'needle spiking', which is injecting someone with drugs without their consent

**Organisational abuse:** Organisational or institutional abuse is the mistreatment of people typically in their workplace brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

## Appendix 7 - Guidance for working with children, young people and adults at risk

UCLan wishes to ensure that anyone working with children, young people and or adults at risk understands how to keep everyone safe. Colleagues, students, apprentices and volunteers should follow this guidance to protect themselves, children, young people and adults at risk. The following guidance will help to create a positive and safe environment for vulnerable groups as they participate in UCLan activities.

Individuals should:

- Treat everyone with fairness and respect and provide an example that they would wish others to follow.
- Work openly avoiding private or unobserved situations and working in isolation. Aim to
  ensure that they are not the only adult present and are at least within sight or hearing
  of others.
- Maintain a safe and appropriate distance and be aware that physical contact may be misinterpreted.
- Ensure that if any form of manual handling/ physical touching is required, it should be engaged in an open observable environment, taking into account the person's reasonable expectation of privacy.
- In sporting situations this should be according to guidelines provided by the appropriate National Governing Body, and in other instances according to UCLan policy.
- Unacceptable behaviour should be challenged, and all allegations or suspicions of abuse should be reported to the Operational/Principal Safeguarding and Prevent Leads
- The welfare of the child, young person or adults at risk must be the priority.

Individuals should **never**:

- Spend excessive time alone with children, young people or adults at risk away from others
- Discuss their personal life.
- Give out their personal contact details (personal phone or mobile number, email or home address).
- Become 'friends' on social networking sites.

- Leave groups of children or young people unsupervised e.g. summer schools.
- Allow a child, young person or adult at risk to use inappropriate language without challenging it.
- Do things of a personal nature that children, young people or adults at risk can do for themselves (If a child has a disability any tasks should be performed only with the knowledge and consent of the parent or guardian and, where possible, the child or young person themselves).
- Allow allegations made by a child, young person or vulnerable adult to be ignored, not recorded or not acted upon.
- Make inappropriate comments, even in fun.
- Allow or engage in any form of inappropriate touching.

In residential settings, individuals should **<u>never</u>**:

- Share a room overnight with a child, young person or vulnerable adult or invite them into their room
- Go into a child's, young person's or adult at risk's room unless it is absolutely necessary (where this is deemed necessary, two members of staff should enter)
- Take photographs, videos or other images of a child or young person without the express permission and informed written consent of their parents or guardians.

## Appendix 8 - Policies and guidance that support the University's commitment to safeguarding

- Safeguarding Risk Assessment & Checklist See Supporting Your Students Mental Health and Wellbeing site.
- Emergency Contact Decision Making Model
- <u>Guidance for managing on campus events and activities involving under 18's and/or</u> adults at risk
- UCLan Prevent duty
- British Values in the Context of UCLan
- <u>Safeguarding Guide for Apprentices</u>
- <u>Safeguarding Guide for Employers</u>
- Online Safety and Security
- <u>Categories of Harm and Abuse</u>
- Procedure for the Management and use of our Oasis Faith and Spirituality Centres and other Faith-Related Facilities

#### Student Support and Wellbeing:

- <u>Support for Students and Apprentices, including Counselling, Mental Health,</u> <u>Wellbeing and Inclusive Support</u>
- <u>Referrals for support</u>
- Support to Study
- Report + Support
- <u>Student Support, Wellbeing and Inclusive Support Privacy Notice</u>
- Supporting your Students' Mental Health & Wellbeing site
- <u>Guidance for colleagues following the death of a student</u>
- Decision Making Process for Sharing Information (Student Services only)

#### Health and Safety:

- <u>Safety, Health and Environment Policies</u>
- Health and safety information for contractors and visitors
- Work Experience for under 18s
- Designated Events Procedure

#### Academic Registry:

- Procedure for Reporting and Responding to Incidents of Harassment, Sexual Misconduct and Domestic Abuse
- Domestic Abuse Policy for Students
- <u>Harassment Policy for Students</u>
- Sexual Misconduct Policy for Students
- <u>Fitness to Practice</u>
- <u>Regulations for the Conduct of Students</u>
- <u>Complaints Procedure</u>
- Admissions Policy for Applicants with a Criminal Conviction

#### People Team:

- <u>Recruitment and Selection (sharepoint.com)</u>
- <u>Disclosure and Barring Service (DBS) Checks (sharepoint.com)</u>
- <u>Public Interest Disclosure Policy.pdf</u>
- Staff Handbook
- Mandatory Training
- <u>Support for Colleagues</u>
- <u>Staff Wellbeing and Support Home (sharepoint.com)</u>
- <u>Safer Recruitment (sharepoint.com)</u>

#### Pre-School

<u>Safeguarding Policy</u>

## **Appendix 9 - Roles and Responsibilities**

### The People Team

- Apply the principles of safer recruitment and provide professional advice in the application of best practice.
- Seek advice from the Deputy Chief Executive and Operational and Principal safeguarding Leads prior to commencing People Team procedures related to safeguarding matters.
- Ensure investigation and disciplinary record keeping practices remain in line with current legislative requirements, including Keeping Children Safe in Education (2023) and GDPR.
- Work with the Operational/Principal Safeguarding and Prevent Leads to ensure that the Disclosure and Barring Service (DBS) are informed of any dismissals or resignations, which may pre-empt any disciplinary action, relating to safeguarding.
- Provide a framework where colleagues, volunteers and contractors have been vetted in accordance with legislative requirements.
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Public Interest Disclosure Policy; and
- To coordinate a single central record.

## **Colleagues and Volunteers**

Colleagues and volunteers have a duty to ensure that we treat everyone with respect and must therefore report any concerns that they may have that children or adults at risk are being abused or mistreated and that children and adults at risk who engage with our colleagues, students, apprentices and volunteers in the course of their work and University led activities, do so in a safe and supportive environment.

Colleagues and volunteers must:

- Be aware of and follow safeguarding policies and other related procedures.
- Provide a safe learning environment.
- Be alert to children, young people and adults at risk who may need early help.
- Ensure that children and adults at risk are treated with respect and supported whenever they engage in University led activity.
- Complete Safeguarding Essentials mandatory training, undertaking appropriate enhanced safeguarding training before engaging in any University-led activity involving children or adults at risk.
- Ensure that they are aware of their responsibilities to safeguard children and adults at risk whether they are acting as a paid member of University staff or supporting University-led activity in an unpaid capacity as a volunteer.
- Ensure that they are aware how to report a safeguarding concern to a Safeguarding Lead or others in a safeguarding role for activities involving children or adults at risk.
- Raise low level concerns about inappropriate behaviour by staff with their line manager and/or the People Team.
- Raise concerns about their own support and safeguarding needs at the earliest opportunity; and
- Operate within the boundaries of their role, seeking support and advice from specialist services as needed.

## **UCLan Students and Apprentices**

UCLan aims to develop a sense of citizenship amongst its learner community. Everyone matters and there is support for all. We believe differences are to be celebrated and that we can all learn from one another. Looking out for one another and sharing concerns forms part of UCLan's safeguarding and reporting culture. This ensures UCLan is a safe place to study, to work and to visit.

Our <u>Yes to Respect</u> video sets out the culture of respect we expect from our UCLan community. We welcome people with open arms, value each other and treat everyone with respect. Regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, background or any other characteristic. This reinforces that there is no place at UCLan for bullying, sexual harassment, intimidation, abuse or inappropriate remarks. Whether in the classroom, on a night out or in the workplace.

We ask that students and apprentices complete the Safeguarding Essentials, Prevent and Suicide Prevention online training. This is so they can be aware of the signs indicating someone may need support. Students and apprentices have a range of support, advice and guidance available, details of which are available on <u>the Student Hub</u>.

## **Employers:**

Employers are expected to:

- take responsibility for an apprentice's welfare in the workplace, being vigilant to any changes in learners' behaviour which may cause concern.
- Alert the University and seek appropriate advice when they feel an apprentice may be at risk.

Further advice and information can be found in our <u>Safeguarding guide for employers</u>

#### **UK Partner Institutions**

Partner roles and responsibilities regarding safeguarding and Prevent are detailed in the Partner agreements and associated roles and responsibilities, and include:

- Advising that students should utilise the student services at the partner institution. Partner institution support staff may consult with the University Student Services on complex cases or the transition of students to the Preston campus.
- The provision of appropriate resources for local student support, including those required to meet their Safeguarding and Prevent responsibilities.
- Ensuring for any student safeguarding requirements that the UCLan Safeguarding Leads are contacted via the Wellbeing Team (wellbeing@uclan.ac.uk, 01772 893020), and for Out-of-Hours Emergencies the Security team (security@uclan.ac.uk, 01772 892068).
- Notifying UCLan of any concerns about a student, or other matters which may relate to UCLan's Prevent Duty.
- Providing the University with required information regarding Safeguarding and Prevent resources (specifically, adults at risk and under 18's).
- Where UCLan or a partner has any concerns about a student or becomes aware of any other matters which may require action in accordance with the Prevent Duty, it shall

notify the other party, providing a copy of all relevant information and all necessary assistance to report and/or take action, as appropriate.

 Partners who are subject to the Prevent Duty are responsible for determining in its absolute discretion what action it needs to take, and each party acknowledges that the other party may be obliged under the Prevent Duty to disclose such information following consultation with the other and having taken its views into account.

#### Schools and Services that work with children or adults at risk:

Anyone who intends to, or may be put in the position of, working with children, young people or adults at risk should ensure that they understand the implications of this policy and procedure before planning and delivering any programme, event, visit or other activity. This includes any young person who undertakes work experience at the University.

In addition to the points above, they will:

- Ensure that staff are appropriately trained staff to support this area of work, including relevant safeguarding training.
- Ensure that colleagues, students, apprentices and volunteers who work with children and adults at risk, are selected or recruited in line with safer recruitment best practice and subsequently receive appropriate safeguarding training which is updated at least annually.
- Ensure that procedures are in place to record work with children and adults at risk, informing the University Safeguarding Team accordingly.
- Ensure that an appropriate safeguarding risk assessment (template available on the <u>Supporting your Students' Mental Health & Wellbeing</u> site) is carried out and that any actions identified by the risk assessment are completed before the activity commences.
- Seek appropriate permissions from the parents or carers of children and young people in relation to photography.

#### Admission and engagement of Under 18's:

Each year, UCLan enrolls a small number of students aged 16 and 17, for which there is a comprehensive admissions process, including the requirement for consent forms, risk assessments and UK based parents/guardians. The University will not admit a child under the age of 16, though deferred entry may be considered.

It is the responsibility of the School Safeguarding Lead (for course delivery) or organiser(s), whether members of the University or external bodies or individuals, of any activities, events or conferences involving under 18s which use University facilities, to make all the necessary safeguarding arrangements in connection with such activity including:

- Complying with admission procedures, as appropriate.
- Undertaking an appropriate risk assessment. Template available on the <u>Supporting</u> your <u>Students' Mental Health & Wellbeing</u> site.
- Ensuring that all staff are properly trained and briefed, including on procedures for dealing with concerns about child safeguarding.
- Seeking appropriate levels of DBS checks for all staff involved, as appropriate.
- Ensuring appropriate insurance arrangements are in place.
- Where a student under the age of 18 is admitted to the University and is to be placed in a University Residence.

#### Schools offering apprenticeship programmes:

- Ensure that apprentices have an awareness of safeguarding and Prevent and understand how to access support services at the University.
- Ensure that safeguarding and Prevent training is provided for all colleagues working with apprentices.
- Maintain open communications with employers regarding the safety and wellbeing of apprentices.
- Ensure that employers that they work with are aware of their safeguarding and Prevent obligations, with support from the Degree Apprenticeship and Safeguarding teams, as appropriate.

#### **Organisers of Activities and Events:**

It is the responsibility of the organiser(s), whether members of the University or external bodies or individuals, of any activities, events or conferences involving under 18s which use University facilities to make all the necessary safeguarding arrangements in connection with such activity including:

- Undertaking an appropriate risk assessment.
- Ensuring that all staff are properly trained and briefed, including on procedures for dealing with concerns about child safeguarding.
- Seeking appropriate levels of DBS checks for all staff involved.
- Ensuring appropriate insurance arrangements are in place.

Further guidance is available in the <u>UCLan best practice guide for running an activity with</u> <u>Children and young people where parents or guardians are not present</u>