

BIRMINGHAM NEWMAN UNIVERSITY

**Safeguarding of children, young people and adults at risk
Policy and Procedure**

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1. Policy Statement

- 1.1 The University recognises that it has social, moral and legal responsibilities to protect and safeguard the welfare of children, young people and adults at risk who are engaged in the institution's activities and services.
- 1.2 All staff and students have safeguarding responsibility and should promote the welfare of students, staff and visitors by being able to identify experience or risk of significant harm, reporting concerns quickly to the appropriate staff member/s.
- 1.3 The University promotes a culture of openness, vigilance and seeking advice to protect members of its community.
- 1.4 The University will take all concerns, suspicions and allegations of abuse, harm or risk of harm seriously, **responding to them promptly**.
- 1.5 The University is not subject the legal safeguarding duties in the same way that schools, further education colleagues, local authorities and care provider area. However, the term 'safeguarding' is used to cover wider ethical or pastoral responsibilities where it may be possible to help to safeguard the welfare of children and adults at risk of abuse or neglect. The University is required to comply with the Prevent Duty and is required to complete an annual return that is signed by the University's governing body (The Council) and submitted to the University Regulator (the Office for Students). Additionally, the University is a Registered Charity, this carries responsibilities outlined in the Charity Act.
- 1.6 The University has a Safeguarding Task Group, reporting to Senate to oversee the University's Safeguarding and associated policies and procedures. The Task Group meets quarterly. The University's governing body (The Council) have oversight and responsibilities" to receive assurance that adequate provision has been made for the general welfare of students".
- 1.6 The University seeks to ensure that its policies and procedures comply with all current statutory duties and has taken into account its duty of care under:
 - The Health and Safety at Work Act 1974
 - The Prevent Duty
 - The Online Safety Bill
 - The Rehabilitation of Offenders Act 1974
 - The Data Protection Act 2018
 - The Children's Act 1989 and 2004
 - The Safeguarding Vulnerable Groups Act 2006
 - Working Together to Safeguard Children 2018
 - The Counter-Terrorism and Security Act 2015
 - The Care Act 2014
 - The Care Act Statutory Guidance 2014
 - The Serious Crime Act 2015
 - The Anti-social Behaviour, Crime and Policing Act 2014?
 - The Higher Education and Research Act 2017

- UUK
- HERA (as set out in the OfS Regulatory Framework)

1.5 The University will ensure that any staff, students, associates or volunteers who have substantial unsupervised, one-to-one contact with children, young people or adults in vulnerable situations will undertake Disclosure and Barring Service (DBS) disclosure, usually at an enhanced level. A satisfactory check will need to be received by the University before the start of work or relevant activities on an unsupervised basis.

2. Purpose of the Policy

- 2.1 This policy and associated procedure explains how the University will safeguard children, young people and adults at risk and how it will respond to concerns, including the provision of support.
- 2.2 The policy provides all those working for the University (including volunteers, agency staff, contractors and students) with clear guidance on how to identify risks and reporting concerns if they suspect a child, young person or vulnerable adult is experiencing, or at risk of experiencing and is underpinned by our culture of openness, vigilance and seeking advice to protect members of its community:
- Abuse (physical, emotional, psychological, sexual, domestic, financial, exploitative or neglect / abandonment, planned or unplanned, single or repeated acts)
 - Behaviours which cause harm to self or others
 - Forced (not arranged) marriage
 - Radicalisation under the terms of the Prevent agenda
 - Suicidal ideation / intent
 - Honour-based violence
 - FGM (Female Genital Mutilation)
 - Criminal exploitation/County Lines
- 2.3 The policy and associated procedure provides generic guidance for areas of the University which do not have their own specific procedures.
- 2.4 Appendix iv; Relevant University Policies and Procedures, should also be considered in conjunction with this policy.

3. Scope of the Policy

- 3.1 The University has visitors, staff and students under the age of 18 years and within the course of its activities, staff, students and visitors may also come in to contact with children, young people or adults in vulnerable situations who are not members of the University. Examples of activities include:
- Teaching, supervision and support of staff and students
 - Summer schools, school visits, and other events such as work experience
 - Outreach activities taking place on or off campus
 - Student Halls of Residence

- Sports Centre
- As research subjects
- Attendance or participation at private functions run by the University
- Children accompanying members of staff or students to work
- Conferences
- On placements
- Attending a session at Newman Health & Wellbeing
- In other professional and clinical settings
- Field trips, excursions, volunteering and other social activities at both the University and via the Students' Union
- Counselling

Please see the University's policies: students under the age of 18 and Children on University Premises.

- 3.2 Universities have a duty to prevent anyone (staff, students, associates or visitors), regardless of vulnerability or age, from being drawn into terrorism. This duty (The Prevent Duty) must be balanced with the commitment to freedom of speech and academic freedom which are essential principles of Newman University's mission and ethos. [Annex B](#) provides some specific guidance.

4. Definitions (refer also to [Annex A](#))

- 4.1 **Child or young person:** This applies to a person who has not yet reached their 18th birthday. In legislation and guidance 'child' typically refers to those under the age of 18 who are still in full time education and 'young person' refers to those under the age of eighteen who have left full time education.
- 4.2 **Adult at risk:** The University considers any person to be vulnerable if they need additional protection or input to enable them to achieve their full potential. An individual's vulnerability can vary depending on the activity being carried out and the people that are present. Some of the groups the University deem to be vulnerable include, but are not limited to:
- Young people leaving local authority care or have been looked after children
 - Carers who are unpaid, overburdened, under severe stress or isolated
 - A disabled person who has specific support needs, and as a result of those needs, are unable to protect themselves against the risk of abuse or harm
 - A person who is, or has been, subject to abuse
 - A person living with or someone who abuses drugs or alcohol
 - A person who may be living in unsuitable, temporary accommodation or homeless
 - Women who may be particularly vulnerable as a result of isolating cultural factors

The British Medical Association notes that the presence of these factors does not necessarily make someone at risk; it is how they combine and manifest in the individual. A key factor in each case is whether the individual is able to take steps to protect and promote his or her interests.

'The term 'vulnerable' adult is contentious and care must be taken to avoid using it pejoratively or in ways that undermine fundamental rights, interests or freedoms. A clear

distinction must be drawn between adults who retain capacity to make decisions and those whose capacity has been lost or impaired'. (BMA guidelines).

- 4.3 **Safeguarding:** This relates to the action taken to promote the welfare and protection of children, young people and adults at risk, and to protect them from harm.
- 4.4 **DBS (Disclosure and Barring Service):** This statutory body helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It was created in 2012 out of the merger of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA).
- 4.5 **The University:** The term is deemed to include the Students' Union, as both bodies are committed to working together and sharing information in order to safeguard the interests and wellbeing of staff, students and visitors.
- 4.6 **Radicalisation:** A process by which an individual or group comes to support terrorism and forms of extremism leading to terrorism. Radicalisation can be both violent and non-violent. The University has additional duties under the Counter Terrorism and Security Act 2015, or the Prevent Duty, to prevent individuals within its community from being drawn into terrorism.

5. Sharing of Information

- 5.1 Whilst, among other obligations, the Data Protection Act places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so might result in the failure to share a safeguarding concern outside of the university without consent. **Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protection of children, young people and adults at risk, and to protect them from harm.**

The University has a [Privacy Notice for students](#) where it details that data that the University holds may be used to protect data subjects' vital interests. Disclosures made in this way must be proportionate and be in the substantial public interest. For further generic information on information sharing, you can access and download the following documents:

[Adult safeguarding: Sharing Information, social care institute for excellence](#)

[Information sharing – advice for safeguarding practitioners 2018](#)

6. Roles and Responsibilities

6.1 The responsibilities of all staff

All members of staff have responsibility for safeguarding. Those who come into contact with children, young people and adults at risk are in a position of trust and have a duty of care to act if there is a cause for concern. All staff should:

- understand what abuse is
- take advice from one of the University's Safeguarding Contacts if they have any concerns and wish to talk these concerns through
- listen carefully to children, young people and adults at risk

- be aware of and act in accordance with the University's safeguarding policy and procedure
- participate in appropriate safeguarding and Prevent Duty training to which the University makes available or requires staff to attend
- consult with and take advice from the University's [Safeguarding Contacts](#) where there is reason to believe that a student to whom this policy applies may be at risk of being drawn into terrorism.

6.2 Position of trust and relationships with young people

Staff must not put children or young people at risk of harm by their own conduct. It is a criminal offence for a person who is 18 or over to engage in sexual activity with a person who is under 18, where the older person is in a position of trust. A position of trust is one where the person (who is 18 or over) 'looks after' persons under 18 who are receiving education at an educational establishment. 'Looks after' is defined as caring for, training, supervising or being in sole charge of a child or children. Therefore, a member of staff who engages in sexual activity with a student aged 16 or 17, even where the relationship is consensual, could incur criminal liability, in addition to being subject to the University's Disciplinary Procedure.

6.3 Safeguarding Contacts and members of the Safeguarding Task Group (see [Annex D](#))

6.3.1 Role of Safeguarding Contacts

- o offer an initial point of contact, should any student or staff member in the department have any concerns relating to safeguarding, including Prevent-related concerns¹ ([Annex B](#))
- o take appropriate log and records of incidents
- o highlight and champion best practice relating to safeguarding
- o undertake appropriate safeguarding training
- o ensure appropriate any local procedures are in place (if applicable, e.g. relating to areas with professional programmes).

Faculty Safeguarding Advisors will normally be the Safeguarding Contacts that are normally members of the Safeguarding Task Group, although they may need to seek advice from the Faculty Deanery. A list of the [Safeguarding Contacts](#) and the [members of the Safeguarding Task Group](#) are available on the University's intranet (please also see [Annex D](#)).

Although it is not the responsibility of University staff to initiate an 'investigation' into safeguarding cases, it is our responsibility to consider and recognise safeguarding concerns and to share these with relevant external bodies in a timely manner. Consequently, there is a responsibility to gather factual information about the circumstances (e.g. what, why, how) – see [Record Keeping in Annex C](#).

¹ In instances where a concern relates to possible radicalisation and/or extremism as defined by the Prevent Duty, the Safeguarding Contacts will consult with the University Secretary and Registrar, who will consider what action is necessary (including referral to external bodies). If it is decided to report, this is an OfS Reportable Event and is required to be reported within 5 working days.

6.3.2 Role of the Safeguarding Officer (students):

The **Director of Student Services** receives and advises on causes of concern relating to students, arranging internal support and intervention, and overseeing referral to outside agencies, where appropriate.

Mr Daniel Tasker

Director of Student Services

D.Tasker@staff.newman.ac.uk

0121 387 4612

6.3.3 Role of the Safeguarding Officer (staff):

The **Director of Human Resources** undertakes DBS checks for relevant staff and investigates allegations relating to staff misconduct. She can be contacted for advice about safeguarding concerns.

Ms Giosi Birkett

Director of Human Resources

g.birkett@newman.ac.uk

0121 387 4587

6.3.4 Role of the Designated Safeguarding Officer (institutional lead):

The **University Secretary and Registrar:**

- Provides a strategic lead in relation to safeguarding matters and is accountable for the University's safeguarding practice
- Ensures the policy is monitored and reviewed in accordance with changes in legislation, guidance and best practice
- Maintains confidential records of relevant cases and action taken

Yvonne Salter Wright

University Secretary

y.salter.wright@staff.newman.ac.uk

The **Deans of Faculties and Directors / Heads of Professional Services (UOT Managers)** must ensure all activities in their areas involving children, young people or adults at risk are in accordance with this policy and associated procedures. They are responsible for ensuring there is a local Safeguarding Contact for their department who is contactable as a local lead for advice and is appropriately trained. Where safeguarding incidents occur within a partner setting (e.g. a school), the partner's Safeguarding policy and reporting procedure should be followed. Where concerns are passed onto external bodies – this needs to be reported to one of the Officers above in order that this can be recorded within the University's formal log (the log is owned by the University Secretary and access is granted to the Directors of Student Services, Human Resources and the Academic Registrar).

Student Support Services staff engaged in wellbeing advice and guidance provide support for those students who make safeguarding disclosures relating to themselves or third parties. Contact the Student Support Services Help Desk on extension 2418 or email studentsupport@newman.ac.uk

7. Dealing with allegations of abuse or inappropriate behaviour

All staff and students of the University must seek actively to safeguard and promote the welfare of staff, students and visitors. Concerns should be taken seriously and dealt with promptly.

- 7.1 Allegations, concerns or suspicions of abuse or harm should be raised immediately with the local Safeguarding Contact or the Designated Safeguarding Officer, explaining the details as clearly as possible (using the Safeguarding Report Form – link to the form provided in this document). Examples of incidents / situations that should be reported would include those where a child or vulnerable adult (see definitions, section 4 and Annex A):

- Is accidentally hurt
- Is involved in a relationship that is developing in a way which raises a concern that it may be an abuse of trust
- Seems to be becoming attracted to you or to a colleague in a way which worries you
- Has seemed to have misunderstood or misinterpreted something you have done in a way that leads them to believe you are attracted to them
- Has been required to be physically restrained by you to prevent them from harming themselves or others or from causing significant damage to property
- Reports to you alleged abuse regarding a member of the University community or belonging to an external organisation using the University's facilities
- Reports to you alleged abuse of another member of their family who is a child or vulnerable adult
- Has any suspicious or unexplained marks or injuries
- Makes allegations regarding inappropriate behaviour towards them either within or outside of the University

- 7.2 Staff and students who are unsure of whether or not to pass on a concern may wish to talk first to their manager (staff), personal tutor/module tutor/supervisor (students), or the General Manager of the Students' Union. The decision as to whether to pass on the concern to a Safeguarding Officer however, remains with the staff or student.

- 7.3 Concerns will be listened to sensitively and in a confidential manner. The identity of the person raising the concern will not be disclosed to the person who is the subject of the concern (unless it becomes apparent that the concern was not made in good faith).

- 7.4 Students and members of staff should not attempt to investigate concerns or allegations themselves. It is the responsibility of external authorities rather than anyone connected with the University to investigate safeguarding concerns.
- 7.5 Students and members of staff should not normally make referrals to external authorities themselves other than in consultation with a Safeguarding Officer. This does not override any responsibility to report concerns to relevant professional bodies, but this should normally be done in consultation with the Designated Safeguarding Officer who will normally consult with the appropriate external authority where necessary.
- 7.6 Where there is a significant risk of harm from a student or member of staff, the Safeguarding Officer will take steps to recommend the suspension of the student or member of staff under the relevant regulations through either the University Secretary and Registrar or the Director of Human Resources, as appropriate.
- 7.7 In situations where the concern is immediate and significant and a Safeguarding Officer cannot be located, students and members of staff should contact Security on the 24-hour emergency number, ext. 2358 (external number: 07564 984885). Under these circumstances, the student or member of staff may also contact the relevant external authority directly for advice about their concerns (see [Appendix V](#) below)
- 7.8 If a student or member of staff other than a Safeguarding Officer makes a referral to an external authority, then they must notify the Designated Safeguarding Officer that a referral has been made as soon as reasonably practicable.
- 7.9 In the majority of situations there will not be a report back to the person who has raised the concern. If it is possible to report back to them that their concern has been investigated and found to be baseless, then this will happen, but if it does not happen it does not necessarily mean that the concern was verified. In the majority of cases it is very likely that the person who raises the concern will not see any action occurring. This does not mean that no action is taking place; rather that the case is being handled in the strictest confidence.
- 7.10 In many cases where a concern has been raised, there may be no immediate intervention required. However, the line manager or relevant Safeguarding Officer, together with the person who first raised the concern, should regularly review the situation and keep a 'watching brief'. Agreement should be made on what may lead to an escalation and when this is referred to the Designated Safeguarding Officer. Often, the involvement of Student Support Services staff will be the only intervention required, in a supportive capacity.
- 7.11 This policy assumes that staff, students and visitors would not raise a concern unless they had a genuine reason to do so. Where concerns are raised in good faith, they will not be subject to any reprisal even if they turn out to be mistaken. However, should concerns be raised vexatiously, the person raising the concern will be investigated and may be subject to disciplinary action.

8. Reporting to External Authorities

8.1 The University may be under an obligation to pass on concerns to relevant professional bodies/agencies under certain circumstances. This would normally be the immediate local authority of Birmingham, but there may be certain circumstances when this is another local authority. In addition to these responsibilities, the University is under obligation to notify:

- the Multi-Agency Safeguarding Hub (MASH) of actual or potential harm to children or adults at risk
- the Adults & Communities Action Point (ACAP) of actual or potential harm to adults in vulnerable situations
- the Channel Programme of actual or potential harm to staff, students, associates or visitors who have been identified as vulnerable to radicalisation
- The Disclosure and Barring Service (DBS) if it decides to dismiss or remove an employee, student, volunteer or personnel supplier from the University or to prevent them from working with children or adults at risk (or would or may have if the person had not left or resigned). The duty to refer to the DBS applies even when a referral has been made to a body such as the MASH or other professional regulator regardless of whether that body has also made a referral to the DBS about the person.

8.2 The reports outlined above to the MASH, ACAP or Channel Programme will normally be made by one of the Safeguarding Officers. Reports to the DBS will be made by the Lead Countersignatory for the DBS.

9. Training

All staff and students whose roles and responsibilities include regular contact with children or adults who are potentially vulnerable must be made aware of this Policy, Procedure and related guidance. Safeguarding Officers will receive appropriate training.

10. Policy and Procedure Monitoring and Evaluation

Lessons learnt will come through either the Safeguarding Task Group or the Operational Sub Group as and when required to either shape policies and develop further mechanisms. The Safeguarding Policy and Procedure will be reviewed and amended on a regular scheduled basis or prior to this in view of lessons learnt with case work (see 11 below).

11. Review of Policy and Procedure

The Designated Safeguarding Officer and Safeguarding Officers are responsible for overseeing and updating this Policy and associated procedure particularly with respect to the legal obligations and other external requirements. In the event of no external changes, it will be reviewed initially after one year of operation and thereafter every three years.

Annex A: Definitions and indicators of abuse (Care Act 2014)

Types of Abuse and Neglect

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern.

Self-neglect – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Domestic Abuse and coercive control –including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.

Discriminatory Abuse – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Physical Abuse –including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as

Annex A Definitions and indicators of abuse (Care Act 2014)

medication, adequate nutrition and heating.

Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Not included in the Care Act 2014 but also relevant:

Cyber Bullying – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Forced Marriage – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. The forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.

Mate Crime – a 'mate crime' as defined by the Safety Net Project as 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation (see [Annex B](#)) – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Child sexual exploitation (CSE) - a type of [sexual abuse](#). When a child or young person is exploited they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. This is called [grooming](#). They may trust their abuser and not understand that they're being abused.

Annex A Definitions and indicators of abuse (Care Act 2014)

Female genital mutilation (FGM) - when a female's genitals are deliberately altered or removed for non-medical reasons. It is illegal. It's also known as 'female circumcision' or 'cutting', but has many other names.

County Lines - urban gangs supplying drugs to suburban areas, as well as market and coastal towns, by using dedicated mobile phone lines or “deal lines”. Gangs use children and vulnerable people to move drugs and money to these areas. Once caught up in county lines, exploited individuals are at risk of extreme physical and/or sexual violence, gang recriminations and trafficking.

Signs and indicators of abuse and neglect:

Also see:

For children: [NSPCC – spotting the signs of child abuse](#)

For adults: [SCIE – signs and indicators of abuse](#)

Abuse can take place in any context and by all manner of perpetrator. Abuse may be inflicted by anyone in the club who a person comes into contact with. Or club members, workers, volunteers or others may suspect that a person is being abused or neglected outside of the club setting. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their participation. you may notice that a participant has been missing from training sessions and is not responding to reminders from members or instructors.
- Someone losing or gaining weight / an unkempt appearance. this could be a person whose appearance becomes unkempt, does not wear suitable clothing and equipment and suffers a deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions, in contrast to others who they greet with a smile.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you/another person they are being abused – *i.e.* a disclosure.
- Harassing of a club member because they are or are perceived to have protected characteristics.
- Not meeting the needs of the participant, *e.g.* this could be training anomalies.
- An instructor intentionally striking a student.
- This could be a fellow member who sends unwanted sexually explicit text messages to a learning-disabled adult.
- This could be a member threatening another member with physical harm and persistently blaming them for poor outcomes.

Annex B: Guide to Vulnerabilities – Drawing on the Prevent Duty

Experimenting with and expressing political and/or religious ideas may well be a very positive part of the university experience for many students. However, when these thoughts include violent actions as legitimate, there may need to be an intervention to prevent a crime being committed. A small number of people may be vulnerable to a range of radicalising political and/or religious extremism.

1. Indicating Factors

There is no set pattern to how radicalisation may occur, but signs that an individual may be vulnerable to this may include the following:

- **Cultural or religious isolation**, especially a student actively avoiding a diverse group of people
- **Changes in peer group**, such as spending long times away with unusual people
- **Isolation from family** and significant difficulties in adapting to university life
- **Extreme political activism or the possession of literature advocating extremist views or actions**; noticing any sudden and significant increases in political activity, especially around issues championed by extremist groups
- **Sudden changes in religious practices that gives rise to concern**, either becoming more active or adopting a new religion **Accessing violent and hate rhetoric** either in print, online or expression verbally
- **Sudden change to physical appearance** (e.g. clothing, tattoos, beard ec.) alongside other factors.
- **Suspicious behaviour**; very large sums of money, multiple passports / personal documents, large amounts of peroxide, fertiliser, unusual looking cooking and kitchen appliances or other everyday items which could make explosives

Rather than being signs of potential radicalisation, many of these might alternatively suggest other support needs. This is why our approach is to consider each case individually and decide on the best way forward, rather than to rush to conclusions which may be inaccurate.

2. What should you do?

If you have concerns about a student and are not sure whether or not extremism or radicalisation might be a factor, it is important to act promptly and speak to your Safeguarding Contact and following the guidance outlined within the Safeguarding Policy (Section 6).

CHANNEL

Channel is a multi-agency, early intervention process approach, to provide support to individuals who are at risk of being drawn into terrorist related activity.

Channel uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

Channel seeks to;

- identify individuals at risk of being drawn into violent extremism
- assess the nature and extent of that risk
- develop the most appropriate support for the individuals concerned.

Annex B Guide to Vulnerabilities – Drawing on the Prevent Duty

Channel board comprises of a coordinator who leads a multi-agency panel. The role of the multi-agency panel is to develop an appropriate support package to safeguard those at risk of being drawn in to violent extremism based on an assessment of their vulnerability.

Who are the panel?

Depending on the nature of the case the panel may include representatives from the following: The police, local authority Prevent Lead, schools, colleges and universities, Youth Offending Services, Directors of Children's Services, Common Assessment Framework coordinator, health services, UK Border Agency, social workers, housing, prisons, probation, local communities, voluntary organisations and charities. At a Channel meeting partners collectively assess the risk and decide whether the referral:

- is vulnerable to violent extremism and therefore appropriate for Channel.
- should be referred to a different support mechanism.
- should exit the process.

This is similar to the way in which individuals at risk from involvement in crime, drugs and other social issues are supported.

Partnership involvement ensures that those at risk have access to a wide range of support ranging from mainstream services, such as health and education, through to specialist mentoring or faith guidance and wider diversionary activities. Each support package is monitored closely and reviewed regularly by the multi-agency panel.

If the panel considers that support to reduce vulnerability to violent extremism is required, they devise an appropriate support package. This takes the form of an action plan setting out details of the statutory or community partners who will lead on delivery of the support.

Types of support could be - counselling, faith guidance, civic engagement, working with support networks or mainstream services.

Annex C: Record Keeping: Safeguarding Reporting Form and Safeguarding Action Form

The following online forms should be completed:

[Safeguarding Reporting Form](#)

If you suspect that an individual is at immediate risk and in need of protection, then you should call the police on 999 (emergency) or 101 (non-emergency) immediately.

You must only complete this form if you are doing so having read the Safeguarding of Children, Young People and Adults at risk Policy and Procedure. If you need to provide information as the Safeguarding Contact in response to a report that has been made, please use the Safeguarding Action Form available from <https://bit.ly/safeguardingaction>

If you suspect that an individual is at immediate risk and in need of protection, then you should call the police on 999 (emergency) or 101 (non-emergency) immediately.

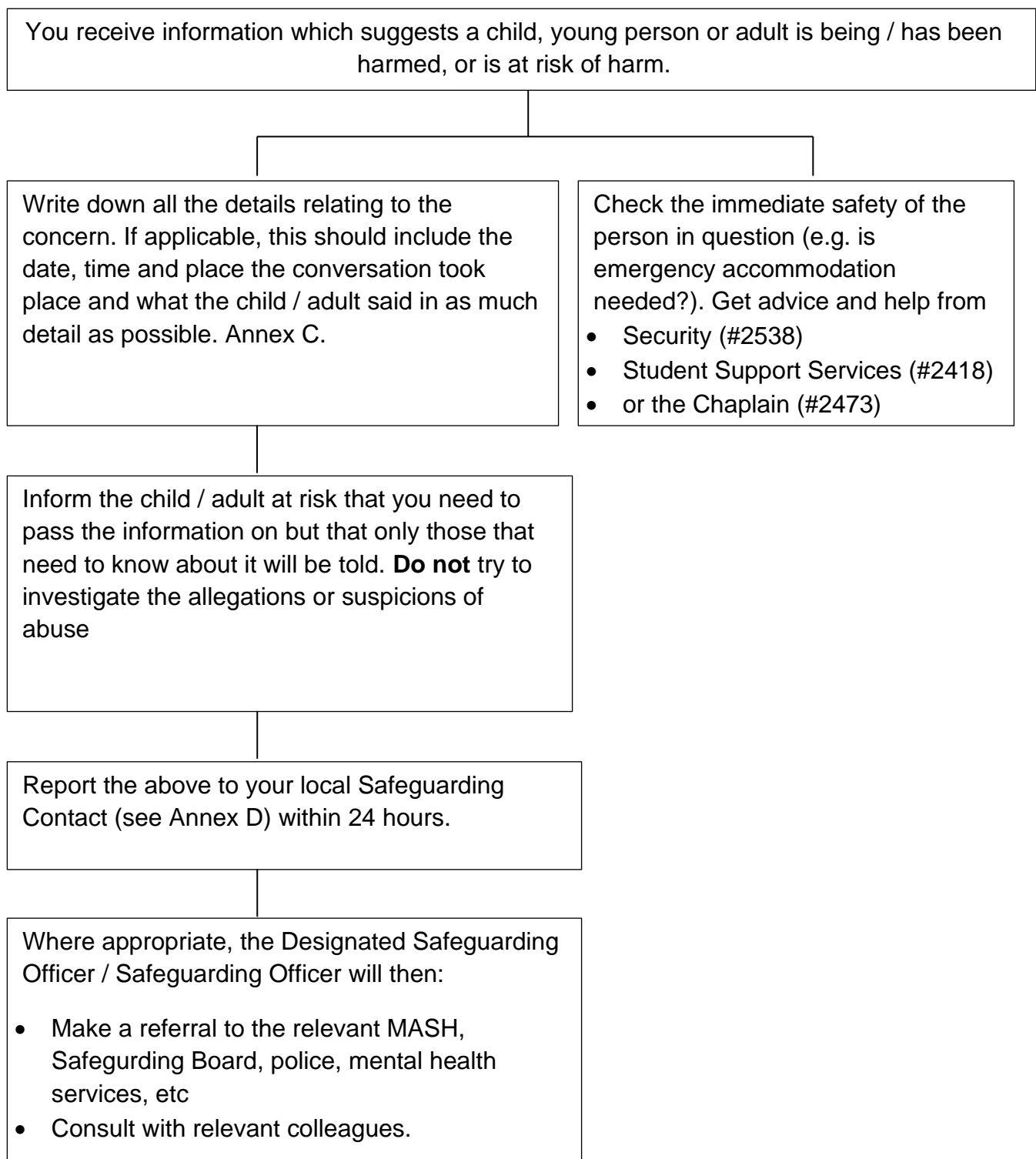
You are encouraged to read the Privacy Notice for Safeguarding Report Form available near the bottom of the following webpage www.newman.ac.uk/privacy-notices/#blueprint_7

Annex D: University Safeguarding Contacts

A full and comprehensive list of our Safeguarding contacts can be found on our intranet page:

<https://www.newman.ac.uk/intranet/knowledge-base/safeguarding/>

Appendix I: Flow diagram for receiving and reporting concerns



Appendix II: Code of Behaviour and Good Practice

If a child or adult at risk makes an allegation or discloses information about a situation where abuse is suspected, the individual to whom the disclosure is made should try to remain calm and, if possible, establish full details, noting the following points:

- React in a calm and considered way, whilst showing concern
- Reassure the individual that it is right for them to share the information and that they are not responsible for what has happened
- Take seriously what the individual has to say
- Do not interrogate the individual but ask questions of clarification to ascertain whether there is a concern that needs to be reported
- Listen to the individual and do not interrupt while they are recounting significant events
- Offer reassurance that the problem can be dealt with
- Do not give assurances of confidentiality but explain that you will need to pass on the information to those that need to know
- Make a comprehensive record of what is said and done as soon as possible after speaking to the individual (and before leaving work for the day). Keep all original notes, as they may be needed as evidence. The comprehensive record should include:
 - Accurate, detailed notes of what the individual says has occurred, i.e. as close as possible to the person's own words and not interpreting what they are describing with your own terminology. This record may be needed later in any criminal trial and should therefore be as accurate as possible
 - Details of the allegation or concern
 - A description of any injury. Note, however, that you must not remove a person's clothing to inspect any injuries
 - Dates, times or places, and any other information that may be helpful in investigating the allegation

The incident, allegation or concern should be reported immediately to the local Safeguarding Contact for appropriate action to be taken. If the concern actually relates to one of those staff members, then the individual/s making the disclosure should approach the next level of management or the Designated Officer as outlined in the University's Public Interest Disclosure ('Whistleblowing') Policy and Procedure. For the avoidance of doubt this works as follows:

- Concerns about any member of UOT, the individual should go to the Registrar & Secretary.
- Concerns about any member of the University's Senior Leadership Team (including the Vice-Chancellor but with the exception of the Registrar & Secretary), the individual should go to the Registrar & Secretary.
- Concerns about the Registrar & Secretary, the individual should go to the Designated Officer (The Chair of the Audit Committee and a member of the University Council).

It is not within the remit of any University employee to investigate allegations or suspicions of abuse – where the Designated Safeguarding Officer believes it is appropriate the concerns will be reported to the Police or Social Services.

Appendix III: Reporting a concern (also see [Annex C –Safeguarding Reporting Form](#))

Using the definitions in this Policy, the following questions should be commented on where possible:

- 1) Is a child or adult at risk of harm/has a child or adult been harmed?
- 2) What kind of harm is it? (Physical, psychological, sexual, financial, neglect).
- 3) How serious is the harm or threat of harm? (Low, moderate, high)
- 4) Is there any suggestion that harm or threat of harm may be repeated or get worse?
- 5) Is there any suggestion that the harm or threat of harm was intentional?
- 6) Has violence been threatened?
- 7) Has there been intimidation?
- 8) How long has the harm or threat of harm been going on?
- 9) What impact has the harm or threat of harm had on the child's or adult's independence, health and wellbeing?

Appendix IV: Relevant University Policies and Procedures

The following is a list of university policies procedures which may be appropriate to refer to when handling a safeguarding issue – not exhaustive:

[General Academic Regulations](#)

[Children on University Premises](#) Intranet

[Admissions Policy](#)

[Data Protection Policy](#)

[DBS Policy](#)

[Dignity at Work Policy](#)

[Dignity at Study Policy](#)

[Disclosure of a Disability](#)

[Equality and Diversity Policy](#)

[Fitness to Practise and Study Policy](#) Intranet

[Health and Safety Policies](#)

[Health and Safety Policies, including Risk Assessment](#) Intranet

[Mental Health Policy](#)

[Student Death Policy](#) Intranet

[Recruitment of Ex-Offenders Policy](#)

[Research Ethics Framework](#)

[Sexual Harassment, Assault and Violence; student policy and guidance](#) Intranet

[Staff Recruitment Policy](#)

[Student Disciplinary Procedures](#)

[Staff Disciplinary Procedure](#)

[Student Alcohol and Substances Policy](#) Intranet

[Students under the age of 18 years Policy](#) Intranet

[Public Interest Disclosure \('Whistleblowing'\) Policy and Procedure](#)

[Freedom of Expression Code of Practice](#)

[Social Media Framework](#)

Appendix V: Links to External Sources of Guidance

Concerns about abuse or harm of children resident in the Birmingham area

MASH (Child Protection)

<http://www.birmingham.gov.uk/child-protection>

0121 303 1888

Concerns about abuse or harm of children generally (if you do not know the local authority area in which they are usually resident)

NSPCC Helpline (24/7);

Telephone [0808 800 5000](tel:08088005000) or email help@nspcc.org.uk

<https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/what-if-suspect-abuse/>

Concerns about abuse or harm of adults at risk in the Birmingham area

Birmingham Safeguarding Adults Board

<https://www.bsab.org/how-to-report-abuse/>

0121 303 1234

Concerns about someone's mental health:

Birmingham Mental Health teams:

0121 262 3555

0800 915 9292

Samaritans; call 116 123 or email jo@samaritans.org

Emergencies; call 999 and ask for the Street Triage Mental Health Team

Concerns about Forced Marriage and/or honour-based violence:

Forced Marriage Unit

<https://www.gov.uk/guidance/forced-marriage#how-the-forced-marriage-unit-can-help>

Telephone: +44 (0) 20 7008 0151

Email: fmua@fco.gov.uk

Karma Nirvana

<https://karmanirvana.org.uk/>

Telephone helpline (9am – 5pm) [0800 5999 247](tel:08005999247)

West Midlands Police's resources and local contact details for honour-based violence advice and reporting

<https://www.west-midlands.police.uk/node/908>

FGM (Female Genital Mutilation) advice and contacts

In the UK, FGM / female circumcision / female genital cutting is illegal, as is taking or helping another person to take a British national or permanent resident overseas for FGM.

<https://www.gov.uk/female-genital-mutilation-help-advice>

NSPCC FGM Helpline

Email: fgmhelp@nspcc.org.uk

Telephone: 0800 028 3550

From overseas: +44 (0)800 028 3550

Domestic Violence and Abuse contacts and resources

West Midlands Police (telephone 999 emergencies, 101 non-emergencies)

<https://www.west-midlands.police.uk/your-options/domestic-abuse>

Birmingham Area resources

<http://birminghamcsp.org.uk/our-work/domestic-violence/domestic-violence-support-services.php>

Suspected terrorism:

<https://www.west-midlands.police.uk/keeping-you-safe/behind-the-badge/tackling-terrorism/who-to-contact/index.aspx>

Homelessness

Shelter

http://england.shelter.org.uk/housing_advice/homelessness/guide/homeless_get_help_from_the_council/who_qualifies_for_housing

Gateway House

https://england.shelter.org.uk/get_help/local_services/birmingham_gateway_house

Helpline [0344 515 1800](tel:03445151800) (9am – 5.30pm Monday – Thursdays, 9am - 5pm Fridays)

For Birmingham residents:

<https://www.birmingham.gov.uk/homeless>

Appendix VI: Privacy Notice for Safeguarding Report Form and Safeguarding Action Form

Any information that you supply on the Safeguarding Report form will be held and processed in line with the Data Protection Act 2018 and GDPR.

What type of personal data is collected?

The Safeguarding Report form asks for basic personal details of the person completing the form: and also personal data about the person who the report is about.

Personal data of the person completing the form includes: name, contact details, their opinion on whether the person making the report considers the person to be in danger of imminent harm, the actions already taken, who they are (e.g. a student, staff member, member of the public, third party etc.) and the relationship to the person whom the report is about,

Personal data about the person whom the safeguarding report is about: name, age, date of birth, contact details, their type of university programme, whether the person making the report considers the person to be in danger of imminent harm, the nature of concern/disclosure and associated information / observations, the relationship to the person making the report.

What is the personal information used for?

We use this information to collate information about incidents that impact on the safety of our students. This enables us to develop services and training for the future. When there is a serious safeguarding concern, we may share this with external services as per the Student Wellbeing Confidentiality policy. It will not be used for any other purpose. We only share this data in an anonymous format within the university to influence the development of services. The anonymous information may also be used to respond to Freedom of Information request. We will only contact you if you leave your details requesting support, or if there is a serious safeguarding concern and we are able to identify you from the information you provide. The legal basis for capturing and using this data is vital interests - the information provided will be used to ensure appropriate support/intervention is provided to affected students/staff.

What is the lawful basis for processing the personal information?

Newman University will either receive or collect personal information when someone contacts the organisation with safeguarding concerns or we believe there may be safeguarding concerns. The data collected by Newman University in the event of a safeguarding situation will be as much personal information as is necessary or possible to obtain in order to handle the situation. This is likely to be special category information (such as health information). The lawful basis for processing personal data is 'public task'. The additional condition for processing the special category data is Article 9(2)(b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law...' If the special category personal data is being processed in order to protect someone's life then the lawful basis is likely to be condition Article 6(1)(d) 'processing is necessary in order to protect the vital interests of the data subject or of another natural person'.

How do you store my personal data?

Any hard copies of personal data are kept in a secure location and personal data stored electronically is on servers located within the UK or EU.

How long do you keep my personal data?

We retain this data for a period of up to 7 years; after that time, it is deleted securely.

Who does the University share my personal data with?

The information is used by Newman University staff when handling a safeguarding incident.

Student support staff will only share sensitive personal information about you or your use of our services with Newman University staff outside of Student Support Services if it is relevant to provide you with appropriate support. We only share sensitive personal information about you with external agencies with your explicit consent, subject to the following exceptions:

If there are clear indications that you disclosed a serious intent to harm yourself or others

If you disclose an intent to commit a crime / act of terrorism

Disclosure of the abuse or neglect of a child

Where we feel we are compelled to by law

In the above circumstances your consent would not normally be required, however depending on the nature of the information disclosed, staff will normally attempt to notify you prior to the disclosure.

In accordance with the above statements, Newman University may share information accordingly to ensure duty of care and investigation as required with other partners such as Local Authorities, the Police, healthcare professional (i.e. GP or mental health teams).

Your rights in relation to your personal data

You have the right to correct or update your personal data at any time. Please email dpo@newman.ac.uk to update your details. You may have the [right to have your personal data deleted](#), the [right to restrict processing](#), the [right to object](#) and / or the [right to data portability](#). Follow the links to find out whether those rights apply in these circumstances. To do any of those things or if you have followed the links but would like clarification please email dpo@newman.ac.uk

You have the right to see the personal data we hold about you. We recommend you use our online form. All information about how to request your data can be found on our [dedicated web page](#). You can also contact our Data Protection Officer by email dpo@newman.ac.uk or by post Newman University, Genners Lane, Birmingham, B32 3NT.

Data protection law also gives you rights regarding 'automated individual decision-making and profiling'. However Newman University does not carry out any 'automated individual decision-making and profiling' so these rights are not relevant to your personal data collected by us.

You have the right to lodge a complaint with the Information Commissioners Office about the handling of your personal data and can find out more about this on their website <https://ico.org.uk/concerns/handling/>

Where can I get more information?

[Newman University's Cookies and Internet Privacy Policy](#)

[Newman University's Data Protection Policy](#)

[Newman University's Data Protection General Information](#)

[The Information Commissioner's Office \(ICO\) information for members of the public - Your Data Matters website](#)

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|-----------------------|---|
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| 1 | Feb 2022 | Major update | Andrea Bolshaw and Sian Howarth | Updated to discuss with SGTG |
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| 3 | April 2022 | Signed off by UOT | Andrea Bolshaw and UOT members | For publication |
| 4 | Dec 2023 | Postholder name changes only | Yvonne Salter Wright | For publication |
| 5 | March 2024 | Safeguarding reporting link updated. New logos added. | Daniel Tasker | For publication |