



## Safeguarding and Prevent Policy and Code of Conduct 24-25

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| 27/08/2025  | Academic Registrar  | Academic Board     | 1.1     | Academic Board |
| <b>Policy/Procedure Management and Responsibilities</b> |   |                    |         |                |
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| Linked Documents and Policies Internal                  | UKMC Safeguarding Implementation Framework<br>UKMC Safeguarding Workflow<br>UKMC Equity, Diversity and Inclusion Policy<br>E6 Report and Support Webpage accessible via <a href="#">UKMC   Policies and Legislation</a><br>UKMC Vulnerable Student Support Policy<br>Procedure for Holding Guest Speakers and Events (and Form)   |                    |         |                |
| Linked Documents and Policies External                  | <a href="#">Care Act 2014</a><br><a href="#">Counter-Terrorism and Security Act 2015</a><br><a href="#">Prevent duty guidance: England and Wales (2023) - GOV.UK</a><br><a href="#">Mental Health Act 2007</a><br><a href="#">Equality Act (2010)</a><br><a href="#">Condition E6: Harassment and sexual misconduct - Office for Students</a><br><a href="#">Data Protection Act 2018</a> |                    |         |                |

|                      |  |
|----------------------|--|
|                      | <a href="#">Safeguarding - University of Wolverhampton</a><br><a href="#">Our approach to harassment and sexual misconduct - Canterbury Christ Church University</a><br><a href="#">Under-18s-Policy-Staff-Students</a>  |
| Dissemination Plan   | <p>The policy will be distributed via communication bulletins, The document will be distributed through staff communication channels, leadership meetings, relevant training events for staff, ambassadors, and student induction events.</p> <p>The policy will be available on the E6 Report and Support Webpage and/or Policy an legislation area of the website.</p> |
| <b>Accessibility</b> | <b>Alternative formats available on request</b>  |

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## Introduction

UK Management College (UKMC) (the college) aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of, children, young people, adults at risk and others who study at, work at and visit the College. The College recognises our moral and statutory responsibility to safeguard and protect children, young people and adults at risk of harm whether from crime, abuse or from being drawn into terrorism related activity.

## Scope and Implication

This policy applies to all College students and staff employed by the College, staff who teach on College programmes, and volunteers, who may be working with the following groups whom the College encounters through its teaching activities as well as through its outreach activities:

- Children and young people aged under 18 years
- adults at risk (as defined by section 42 of the [Care Act 2014](#))
- adults who may be vulnerable due to age, disability, or circumstances (in line with the Keeping Children Safe in Education Statutory Guidance 2024 )
- any persons who may be at risk of being radicalised by any extremist group or ideology under the terms of the Counter Terrorism and Security Act 2015 (Section 26(1)) and as defined in the Prevent Duty guidance, 2023

Except where necessary to specify, hereafter these groups will be collectively referred to as ‘at risk groups’ or ‘at risk individuals’.

## Policy Statement

The College acknowledges that safeguarding is an important part of Education not limited to under 18 years old, and that protection of children and adults at risk is the shared responsibility of all staff and students of the College.

Young people and adults at risk should be free to learn, work and develop their potential, without fear of violence, abuse or exploitation. Within the College, young people and adults at risk, irrespective of their protected characteristics as defined by the Equality Act 2010, will be valued and their rights to protection and safety fully respected.

The College will take all reasonable steps to establish that those whose work or study involves contact with at risk individuals do not present an unacceptable risk.

The Safeguarding and Prevent policy is aimed to create the conditions for prompt response, and to escalate or manage risks where possible. Matters arising may require escalating to authorities and liaising with local communities as appropriate.

The College, in working with its partners, ensures that its safeguarding policies and practices align to the guidance and procedures available from:

- Manchester Multi-Agency Safeguarding Hub
- Manchester Community Safety Partnership
- Statutory Guidance “Keeping Children Safe in Education” 2024
- Derby Safeguarding Adults Board and Derby Safeguarding Children Board
- Newcastle Safeguarding Adults Board
- Newcastle Safeguarding Children Partnership
- Sunderland Safeguarding Adults Board
- Sunderland Safeguarding Children Partnership

All suspicions and allegations of abuse or inappropriate behaviour will be taken seriously by the College and responded to appropriately as set out in this policy. (See Appendix 1 and 2 for an illustrative list of indicators of abuse and signs of abuse).

The College’s duty of care will be reflected in its disciplinary procedures for students and staff.

The Policy will be kept up to date and periodically reviewed to ensure that any changes in

legislation or guidance are taken into account.

The college understands its responsibility set out in the Counterterrorism and Security act 2015, which imposes a duty to prevent people from being drawn into terrorism. The College will ensure that there are steps in place to protect children and adults at risks from becoming involved with groups that set out to radicalise individuals. Radicalisation can be defined as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Further information and guidance can be located via the Prevent link [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

In the exercising of our functions as a Higher Education provider the College regards the Prevent Duty as being an integral part of our Safeguarding Strategy. The Safeguarding Policy and procedure takes into account this as a key safeguarding consideration.

**CONTEST** - is the UK's counter-terrorism strategy and it aims to reduce the risk from terrorism so that people can go about their lives freely and with confidence.

CONTEST has 4 strands:

- Pursue: investigate and disrupt terrorist attacks.
- Prevent: stop people from becoming terrorists or supporting terrorism
- Protect: improve our protective security to stop a terrorist attack.
- Prepare: work to minimise the impact of an attack and to recover as quickly as possible.

**Radicalisation** Is the process by which a person comes to support terrorism and extremist ideologies. A vulnerable learner or colleague may be more susceptible to being drawn towards or being targeted by those involved in extremist ideology.

## Procedures and Provisions

### Minimising risks of harm (including Social Media)

All the College's staff will be made aware of the College's commitment to the safeguarding/protection of at risk groups and be directed to the Policy and Code of Conduct through induction processes, and will know what to do if a concern arises. Support and advice will be provided to staff if/when such matters arise by a member of the Safeguarding Team.

The College recognises the benefits and opportunities technologies offer to teaching and learning. We provide internet access to all students and staff and encourage the use of technologies. However, the accessibility and global nature of the internet and different technologies available require students and staff to identify and manage risks and challenges associated with such use and know where to refer concerns.

The College recognises that online and digital platforms and social media are increasingly being used to perpetrate abuse, coercion and control. The College takes all forms of abuse seriously including technology-facilitated abuse.

All students and staff should be aware of the risks when taking, downloading and posting images, video or audio online and making them available to others. There are particular risks where personal images, videos or audio clips of themselves or others are posted onto social networking sites, for example. The College will provide opportunities to students to gain information on the appropriate use of images, video and audio at induction and as part of the curriculum. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

No image, photograph, video or audio clip of an individual or group can be copied, downloaded, shared or distributed online without permission from the subject(s) or copyright holder. Photographing, recording or videoing activities on College premises should be considered carefully; staff members are encouraged to notify participants of the likelihood of

their photograph being taken or them featuring in videos or audio clips. Photographs, videos or audio clips approved for use should not include names of individuals without additional, appropriate consent.

The College will make all reasonable efforts to ensure that all members of its staff whose role involves 'regulated' or 'controlled' activity with students and/or adults at risk are suitable for the position and have completed the necessary checks including Disclosure and Barring Service checks and, if appropriate, registration with the relevant external agency.

All students whose study involves work placements in settings where there are at risk individuals must satisfy all reasonable requirements including Disclosure and Barring Service checks and, if appropriate, registration with the relevant external agency.

All students who are employed and undertake regulated activities with at risk individuals on UKMC activities are required to undertake a Disclosure and Barring Service check. It is noted that students employed by the College are employees of the College.

All students will be made aware of the College's commitment to the safeguarding and protection of at risk individuals and the Safeguarding Code of Conduct, and understand that any legitimate suspicions or concerns will be reported to appropriate agencies. Breaches of the Code of Conduct may lead to disciplinary action under the Student Disciplinary Policy.

No images in any format will be circulated or stored involving young students, school pupils, visitors under 18, or vulnerable adults without first gaining explicit written informed consent of those involved and their parents/guardians/carers.

Detailed and accurate written records of referrals/concerns will be kept securely and confidentially when concerns arise, in line with the relevant statutory requirements and the College's Data Protection Policy.

### Action when work or study involves contact with at risk groups and conditions or circumstances present an unacceptable risk

There are occasions where a circumstance or a condition applied to an individual may prevent

them from being a member of an organisation such as the College. Examples may include but are not limited to:

- Information shared through DBS vetting and barring procedures
- Information shared by a Local Authority Designated Officer (LADO), Police or Public Protection Unit
- Conditions applied through a Public Protection Order
- Certain criminal convictions and sentences

Circumstances or conditions applied to a person that prevent them from being a member of the College or from having contact with at risk individuals, must be referred to a member of the Safeguarding Team.

### Action on occurrence or suspicion of abuse

- Abuse can take different forms and includes physical abuse, sexual abuse, emotional abuse as well as neglect and bullying (see appendix 1 and 2). Abuse can have serious and long term effects in terms of development, health and wellbeing including self-esteem and self-image.
- Although the College's staff have no powers to investigate abuse, all have responsibility for reporting any suspicions or concerns of abuse and for ensuring that concerns are taken seriously.
- The College is committed to cooperating closely with appropriate external agencies.
- Those reporting suspicions or concerns must follow the protocols set out below, the most significant of which is to seek the advice of the College's Designated Safeguarding Team as soon as possible.

### Procedure for dealing with allegations of abuse against people who work with children or those who are in a position of trust or suspicions of abuse against an employee of UKMC at work or against a student of UKMC.

- The Designated Safeguarding Lead (DSL) or Deputy DSL, who receives a report of an allegation should immediately seek the advice of the relevant Local Authority Designated Officer (LADO). The LADO will advise whether a strategy meeting is required before the member of staff or student can be informed of the allegation. This is a precaution in case a Police or social work investigation is prejudiced.
- In the case of a College employee or a Student, the Academic Registrar (DSL) and the line



manager should be informed.

- If the LADO advises that it is appropriate, for employees - Head of HR (DDSL) or for students – Academic Registrar should meet with the employee/student concerned to inform him/her that an allegation has been made and also explain the course of action that needs to be taken. It should be clear to the employee/student that this meeting is not an investigatory meeting or disciplinary hearing.

Possible outcomes may include the following:

- There is immediate referral to agencies responsible for safeguarding/protection to deal with the matter. This will take priority over any internal process. (The DSL or DDSL will be responsible for liaising with relevant safeguarding agencies)
- There is reason to suppose abuse may have occurred and further investigation by a safeguarding agency or under the College Staff/Student Disciplinary Procedures may be necessary
- The allegation is prompted by inappropriate behaviour by an employee/student which needs to be considered under the College Staff/Student Disciplinary Procedures
- That the allegation is without foundation and does not warrant further investigation

**Where safeguarding concerns and allegations of abuse call for immediate referral to safeguarding agencies:**

- A risk assessment and need for interim action (e.g. suspension) will be conducted
- Subsequent action taken will be in accordance with the procedures and actions identified by the Safeguarding Committee.
- The Designated Safeguarding Officer will be expected to contribute to discussions on how the investigation will be conducted
- The Designated Safeguarding Officer will liaise closely with the agencies (as appropriate) to obtain information on the progress of the investigation and update the Academic Registrar.

The College will be able to conduct an internal investigation, however, investigation by the Police or safeguarding agencies will take priority. The internal investigation will commence

after the safeguarding agencies or Police have completed their investigations. The College will keep the investigation of all complaints and the records relating to the matter confidential.

When it is appropriate to do so, the allegation will be investigated in accordance with the College disciplinary procedure. As a precautionary measure, and without prejudice to the outcome, the Head of HR (for staff) and the Academic Registrar/Head of Academic Services (for students) may decide to suspend the employee/student pending the outcome of any investigation.

### Action on occurrence or suspicion/concern regarding radicalisation

Those who have concerns or have had concerns expressed to them in relation to any person who may be at risk of being drawn into or vulnerable to radicalisation should raise this at the earliest opportunity with any member of the Safeguarding Team.

The DSL who receives a report of an allegation should follow the relevant Prevent Channel Referral process. In the case of a College employee, the Head of HR (who is also DDSL) and CEO should be informed of the position. In the case of a student the Head of Academic Services (who is also DDSL) should be informed.

### Procedure for dealing with concerns of possible abuse outside the College

If someone is concerned about an incident which has occurred outside the College she/he is required to raise the matter with a member of the Safeguarding Team, who will inform the appropriate service and ensure that appropriate procedures are followed.

### Procedure for dealing with a safeguarding concern or allegation of abuse by an individual of an external organisation using the College facilities

If an allegation of abuse is made against an employee from an external organisation using the College facilities, Safeguarding Team on [Safeguarding@ukmc.ac.uk](mailto:Safeguarding@ukmc.ac.uk) must be notified immediately. Additionally, if a safeguarding concern is raised under the remit of the CTSA 2015 and Prevent Duty guidance, a referral must be made to appropriate authorities by a member of the Safeguarding Team.

The DSL will consider in consultation with the CEO or Provost, whether the external organisation will be permitted to continue to use the College premises or facilities.

## Procedure for interim risk assessment and identifying action to minimise risk

Where an allegation or concern has been raised against an employee or student of the College, the DSL will convene a Safeguarding Panel to carry out a risk assessment. The Panel will be comprised of the DSL, Head of HR (for employees) or Head of Academic Services (for students) and the relevant Campus Safeguarding Officer. .

The role of the Panel is to take a reasonable view of the risk the employee or student poses to the College and those with whom they will come into contact as part of their College activities, including external stakeholders (such as placement providers) and assess whether they pose an unacceptable risk.

The Panel will consider all the evidence available to assess the risk, taking into account:

- the employee's field of work/student's programme of study
- the nature of the allegation/concern
- the seriousness of the allegation/concern
- the circumstances surrounding the allegation/concern.

The Panel may decide:

- that the employee or student be allowed to continue with their College activities;
- that the employee or student be allowed to continue with their College activities with certain conditions and/or restrictions pending the outcome of any investigations;
- that a recommendation is made to the Provost/Dean from the Head of HR (for staff) or Head of Academic Services (for students) to suspend the employee or student pending the outcome of any investigations.

The Panel will make a record of the reasons for their decision to be retained in accordance with paragraph below on Record Keeping

This procedure will also apply where the College is notified that an enrolled student has a previously undeclared criminal conviction, restriction and/or probation order.

## Matters arising regarding Sexual Misconduct and Harrassment

Should consult the Sexual Misconduct Policy available at [UKMC | Policies and Legislation](#) and also the E6 Report and Support Webpage

## Record keeping

A SharePoint/MS Teams area holds central information related to safeguarding and is monitored and managed by the Safeguarding Team. Access is strictly limited to ensure GDPR compliance and the restriction of confidential information and matters arising.

All documents relating to an allegation against an employee will be returned to the Head of HR to be kept in the employee's personal file when the case has been concluded. If the allegation was found to be false or without foundation, no record will be kept in the employee's file except when the employee requests this. All records relating to an allegation against a student will be returned to the Registry when the case has been concluded. If the allegation was found to be false or without foundation, no record will be kept in the student's file except when the student requests this. It will be for the relevant agency to keep records of referrals made to it in accordance with statutory requirements.

## Training

Training should be provided to DSL, Deputy DSL and Safeguarding Officers at Level 3 or above. Senior Leadership Team, students at induction, student ambassadors, lecturers and support roles will also receive training. Safeguarding Committees will typically discuss how to operationalise this, review content, and refresh understanding in line with legislative and regulatory developments.

## Compliance and Review

The Designated Safeguarding Officer will coordinate the recording of any incidents relating to the protection of at risk groups at the College and report to the DSL and DDSL on an termly basis. This will be confidential and if any concerns or patterns emerge these will be dealt with appropriately.

A Safeguarding Committee will meet at least twice a year, chaired by the Designated Safeguarding Lead. The Group will report annually to the College Executive Board. The Group will include the following membership:

- Academic Registrar, Designated Safeguarding Lead
- Head of HR, Deputy DSL
- Head of Quality and Compliance, Deputy DSL
- Head of Academic Services, Designated Safeguarding Officer (DSO)

- Academic Leads (for all the campuses), DSO
- Campus Coordinators/(for all the campuses), DSO
- Lead Student Success Tutor
- Course Leaders

The remit of the Group will be:

- To have oversight of all safeguarding matters and issues relating to protection within the College and to assist the Designated Safeguarding Officer in fulfilling the College's responsibilities as outlined in this policy.
- To ensure and quality assure the implementation of this policy.
- To keep the policy and code of conduct up to date, taking account of changes in legislation, and reviewing and auditing practice as agreed appropriate.
- To review best practice in the higher education sector as a whole and guidance issued by Government or other agencies.
- To ensure accessibility to and ownership of the policy and code of conduct by all staff and students of the Institution.
- To give advice to staff as requested in order to ensure consistency of approach.
- To create a safe culture within the College by sharing learning about best practice and promoting awareness about safeguarding and protection issues.
- To monitor and oversee matters relating to the safeguarding and protection of at risk groups.
- To ensure that clear strategies are developed in respect of safeguarding and protecting, and that they are coordinated and implemented consistently across the College, in a way which anticipates and responds to external and internal developments and ensures that the College can be accountable for safeguarding individuals at risk. To ensure a clear organisational focus on risk management.
- To ensure appropriate and proportionate action is taken in respect of identified risks or concerns and to ensure any learning is shared from matters arising.
- To receive and review the annual report on activity and training undertaken.

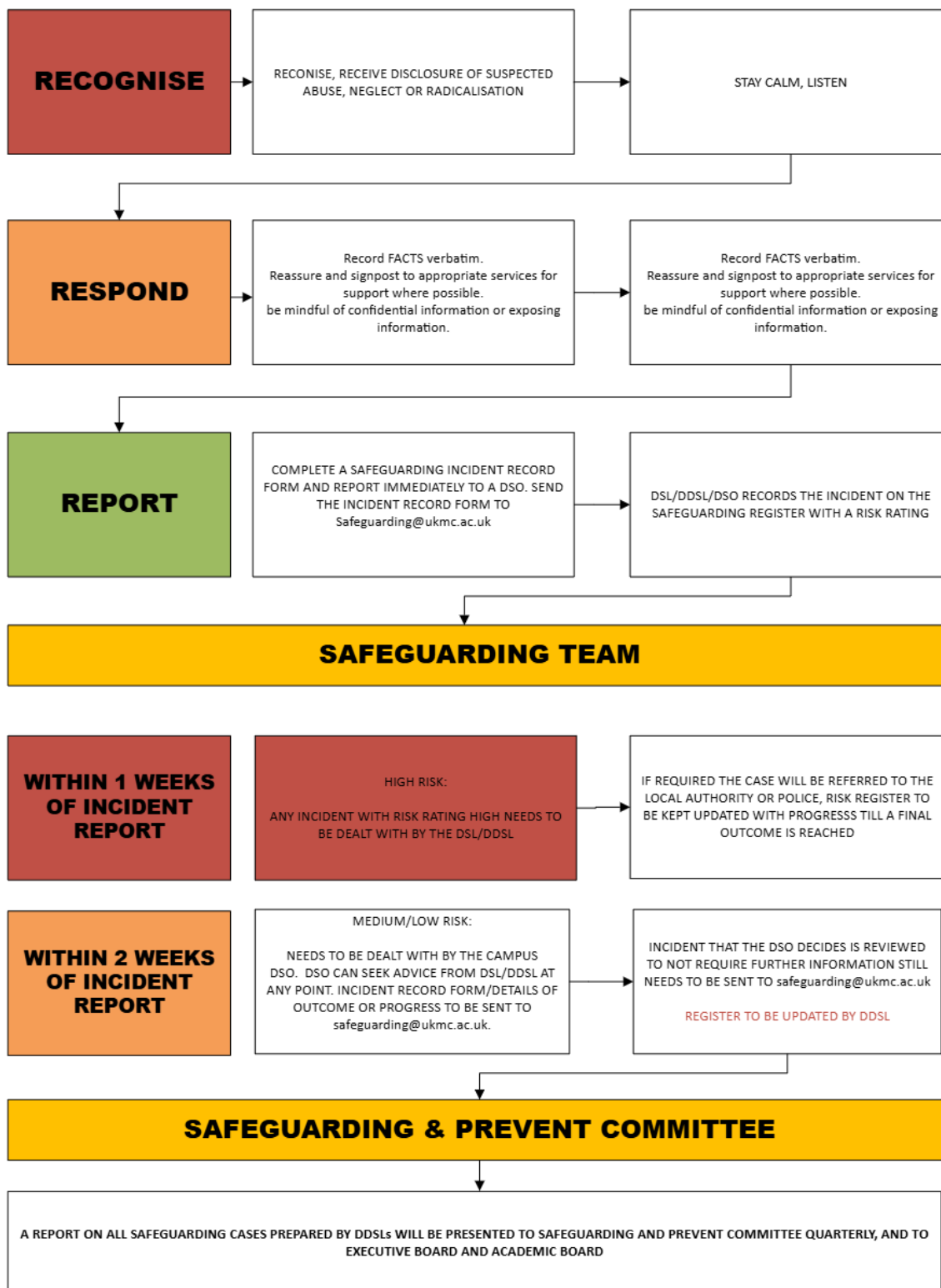
## Roles and Responsibilities

The Designated Safeguarding Lead will have overall responsibility to safeguard and protect at risk individuals

### Safeguarding Team

|   |   |
|---|---|
| Designated Safeguarding Lead                | Mrs Jagori Bandyopadhyay, Academic Registrar,<br><a href="mailto:jagori.bandyopadhyay@ukmc.ac.uk">jagori.bandyopadhyay@ukmc.ac.uk</a> |
| Deputy Designated Safeguarding Lead         | Mr Saul Higgins, Head of Quality and Compliance<br><a href="mailto:Saul.Higgins@ukmc.ac.uk">Saul.Higgins@ukmc.ac.uk</a>               |
| Deputy Designated Safeguarding Lead         | Mrs Karen Philips, Head of Human Resource,<br><a href="mailto:karen.phillips@ukmc.ac.uk">karen.phillips@ukmc.ac.uk</a>                |
| Designated Safeguarding Officer (Abarna)    | Mr GM Sajjad, Campus Coordinator (Abarna)<br><a href="mailto:gm.sajjad@ukmc.ac.uk">gm.sajjad@ukmc.ac.uk</a>                           |
| Designated Safeguarding Officer (Abarna)    | Mrs Roohi Naz, Head of Wellbeing (Abarna)<br><a href="mailto:razia.sultana@ukmc.ac.uk">razia.sultana@ukmc.ac.uk</a>                   |
| Designated Safeguarding Officer (Derby)     | Mr Al Imran; Campus Manager (Derby)<br><a href="mailto:al.imran@ukmc.ac.uk">al.imran@ukmc.ac.uk</a>                                   |
| Designated Safeguarding Officer (Derby)     | Prof Hesham Magd; Academic Lead (Derby)<br><a href="mailto:hesham.magd@ukmc.ac.uk">hesham.magd@ukmc.ac.uk</a>                         |
| Designated Safeguarding Officer (Newcastle) | Dr Uzair Bhatti; Academic Lead (Newcastle)<br><a href="mailto:uzair.bhatti@ukmc.ac.uk">uzair.bhatti@ukmc.ac.uk</a>                    |
| Designated Safeguarding Officer (Newcastle) | Mr GM Parvez; Campus Manager (Newcastle)<br><a href="mailto:gm.parvez@ukmc.ac.uk">gm.parvez@ukmc.ac.uk</a>                            |

## Safeguarding Workflow



# APPENDIX 1

## SAFEGUARDING: CODE OF CONDUCT

### Introduction

This Code of Conduct should be considered in conjunction with the College's Safeguarding Policy and reflects the importance the College attaches to the safety and protection of children, young people and vulnerable adults.

### Code of behaviour and good practice

1. All children and adults at risk should be treated with respect.
2. All activities with children and adults at risk should have more than one adult present or at least one that is within sight or hearing of others.
3. All activities should respect the right to personal privacy.
4. In all activities, staff are required to be aware that physical contact with a child or adult at risk may be misinterpreted.
5. In all activities, staff should recognise that special caution is required when discussing sensitive issues with children or adults at risk.
6. Any physical or manual touching required should be provided openly and if this is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body.
7. In activities, feedback should be constructive rather than negative.
8. In all activities, staff are required to challenge unacceptable behaviour.
9. Any allegations or suspicions of abuse should be reported immediately to the relevant Designated Safeguarding Officer.

### **In all dealings with children or adults at risk, staff should never:**

- Play rough physical games or sexually provocative games
- Share a room with a child or adult at risk
- Enter a private room (e.g. bedroom) unless it is absolutely necessary, and if entering a room must do so accompanied
- Allow or engage in any form of inappropriate touching
- Allow children or adults at risk to use inappropriate language without challenging it
- Make sexually suggestive comments even in jest



- Reduce a child or adult at risk to tears as a form of control
- Allow safeguarding concerns or allegations of abuse to go unchallenged, unrecorded or not acted upon
- Do personal things for a child or adult at risk which they can do for themselves. If a child or adult at risk has a disability any tasks should only be performed by a dedicated support worker, in accordance with recommendations made in a relevant care plan and with the full understanding and consent of the parents/guardians/carers.

## Examples of what should be reported/recorded (See Appendix 2)

### Recognition of abuse

10. The College recognises that its staff may not be familiar with working with children, adults at risk or individuals who may be vulnerable to radicalisation and may not be in a position to recognise abuse. If you are not familiar with working with individuals who may be at risk of abuse, you can receive some basic knowledge by undertaking training provided by the College. This will allow you to be aware of the various types of abuse and also to identify the different cultural contexts of behaviour.
11. It is not the place of staff or students to make a judgement about whether abuse has occurred. This is the remit of the relevant safeguarding agencies.
12. Abuse can occur within any setting and abusers may seek to use community and voluntary organisations to gain access to at risk individuals.

### Definitions

#### **(Ref: University of Wolverhampton, Safeguarding Policy)**

A child and/or Adult at risk may be abused or neglected by parents, cohabitees, step-parents, substitute parents, siblings, relatives, friends, neighbor's, partners and strangers (third party). A child and/or Adult at risk may be abused at home, at school, in an institutional or community setting and may be subject to more than one type of abuse:

**Abuse:** a form of maltreatment of a child. Someone 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 others. Abuse

can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical:** a form of abuse which 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.

**Domestic:** Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. This includes psychological, physical, sexual, financial and emotional abuse or 'honor'-based violence.

**Discriminatory:** Including racist or sexist behaviour, slurs and harassment based on a person's ethnicity, race, culture, religion, gender, sexual orientation, age or disability.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's development capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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 maltreatment of a child, although it may occur alone.

**Financial or material:** Including theft, fraud, internet scamming, pressure in connection with wills, property or inheritance or financial transactions, the misappropriation or misuse of property, possessions or benefits.

**Modern Slavery:** Including slavery, human trafficking, forced labour and domestic servitude, or traffickers and slave masters coercing, deceiving and forcing individuals into a life of abuse, servitude and inhumane treatment.

**Neglect or acts of omission:** 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, for example as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); to protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Organisational abuse:** Including neglect, poor care practice or ill-treatment within an institution or specific care setting such as a hospital or care home for example. This might be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Psychological:** Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal from services or supportive networks.

**Self-neglect:** Neglecting to care for one's personal hygiene, health or surroundings.

**Sexual:** involves forcing 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. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it.

There may be indicative signs of abuse which may include, but are not limited to the following:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally
- An injury for which there may be an inconsistent explanation
- Descriptions of an abusive act or situation

- Unexplained changes in behaviour
- Inappropriate sexually explicit behaviour or sexual awareness
- Unexplained changes in mood or emotional state
- A distrust of others
- The child or adult at risk is not allowed to be involved in normal social activities
- Showing support for violence or terrorism
- Unkempt in appearance, showing signs of neglect or self-neglect
- Use of technology or social media, for example use of forums / platforms and risk of being groomed online for exploitation or radicalisation
- 

### What to do when an abuse is identified

13. If a disclosure of abuse is made or an at risk individual acts in a way where abuse is suspected the person receiving the information is required to:

- React in a calm and considered way but should show concern
- Tell the person making the disclosure that it is right for them to share this information and that they are not responsible for what has happened
- Take what has been said seriously
- Only ask questions to ascertain whether there is a concern but not interrogate
- Listen and not interrupt them if they are recounting significant events
- Not give assurances of confidentiality but explain you will need to pass on this information to those that need to know
- Make a comprehensive record of what is said and done as soon as possible and before leaving work. Keep all original notes as they may be needed as evidence.

14. The comprehensive record should include the following:

- A verbatim record of the account of what occurred in their own words. You should note this record may be used later in a criminal trial and therefore needs to be as accurate as possible

- Details of the nature of the allegation or concern
- A description of any injury; please note that you must not remove clothing to inspect any injuries

The incident, allegation or concern should be reported immediately to a member of the Safeguarding Team, primarily the Designated Safeguarding Lead or Safeguarding Officer. This can also be done by emailing [safeguarding.ukmc.ac.uk](mailto:safeguarding.ukmc.ac.uk).

If the concerns relate to the Safeguarding Officers themselves, or there is urgent need for reporting potential danger or harm to individuals, then a concern must be refer directly to the DSL/DDSL or Provost, as appropriate immediately.

It is the remit of the Local Authorities and/or the Police and not anyone connected with the College to investigate allegations or suspicions of abuse.

## Appendix 2

(Ref: University of Wolverhampton Safeguarding Policy)

The below indicates the types of safeguarding issues that should be referred to the safeguarding team in the first instance to identify the support and service required (please note that this is not a conclusive list, and more information can also be found on the E6 Report and Support information page [UKMC | Policies and Legislation](#)):

The College is committed to providing a safe and positive working environment and understands it is vital to promote the health, safety and well-being of its entire University community; it therefore takes any type of safeguarding issue; or suspected safeguarding issue very seriously and will ensure there is relevant guidance and support in place for concerns such as:

**Sexual exploitation:** Occurs where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child and/or Adult at risk into sexual activity. The victim may have been sexually exploited even if the sexual activity appears consensual. This can occur through the use of technology and not just through physical contact.

Further information and guidance on sexual exploitation can be located here:

<https://learning.nspcc.org.uk/child-abuse-and-neglect/child-sexual-exploitation>

**Criminal exploitation:** Occurs where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child and/or Adult at risk into criminal activity.

Further information and guidance on Criminal exploitation can be located here:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>

**Domestic abuse/violence:** Domestic violence also called domestic abuse includes physical, emotional, psychological, financial and sexual abuse in a couple relationship or between family members. Children and/or Adult's at risk may witness and be affected by domestic abuse/violence in their home life; exposure to domestic

abuse/violence can have a serious, long lasting emotional and psychological impact on an individual.

Further information and guidance on domestic abuse/violence can be located here:  
<https://www.gov.uk/guidance/domestic-abuse-how-to-get-help#recognise-domestic-abuse> <https://www.nhs.uk/live-well/healthy-body/getting-help-for-domestic-violence/>

**Forced marriage:** this is where one or both people do not; or in cases where people with learning disabilities or reduced capacity; cannot consent to marriage; but are pressurised and/or abused and forced to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

Further information and guidance on forced marriage can be located here:  
<https://www.gov.uk/guidance/forced-marriage>

**Faith abuse:** this is where concern for a child's and/or Adult at risk's welfare has been identified due to a belief in elements such as; spirits, witchcraft, demonic possession which can result in the harming of an individual. Abuse can take place against those who are seen as being a witch or have been possessed by an evil spirit; significant harm can occur in the effort to remove evil from a child and/or Adult at risk.

Further information and guidance on faith abuse can be located here:  
<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

**Radicalisation:** children and/or Adult's at risk are susceptible to extremist ideology and radicalisation. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Further information and guidance on Radicalisation/Prevent can be located here:  
<https://www.wlv.ac.uk/media/departments/health-and-safety/documents/how-to-guides/Prevent-guidance-v.2-Nov-2022-final-vers.pdf>

**Modern Slavery and Trafficking:** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced

and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Further information and guidance on Modern Slavery and Trafficking can be located here: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

**Sharing nudes and semi-nudes:** sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

Further information and guidance on Sharing nudes and semi-nudes can be located here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1008443/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible_.pdf)

**Cybercrime:** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.



Further information and guidance can be found at: <http://www.cyberchoices.uk/>

NPCC-When to call the Police National Cyber Security Centre