



UNIVERSITY COLLEGE  
OF ESTATE MANAGEMENT

# **UCEM Code of Practice**

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## Safeguarding and Prevent

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**UCEM Code of Practice**  
**Safeguarding and Prevent**

# 1. Introduction

This Code of Practice provides high-level information on the requirements of UCEM's responsibility with regards to Safeguarding and the Prevent duty, and UCEM's approach to complying with these. The UCEM Code of Practice: Safeguarding and Prevent is applicable to all staff, students, apprentices and trustees.

# 2. Principles of the policy

All UCEM students, regardless of age, have the right to be protected from abuse and to be safe during the activities that they (or their parents/guardians/carers) choose. In the context of UCEM, the institution has a duty to establish appropriate arrangements for the protection of abuse of children and young people under the age of 18, and of vulnerable groups.

The policy covers all instances where UCEM staff may have contact with children, young people and vulnerable adults.

All staff members working for UCEM are in a position of trust, and have a responsibility to ensure that students and other young people who they encounter in the course of their work are protected, in accordance with Safeguarding and Prevent legislation.

All suspicious and allegations of abuse, concerns for health, safety or welfare, or concerns about radicalisation will be taken seriously by UCEM, and will be responded to appropriately. Referrals to external agencies will be made when deemed necessary, in accordance with UCEM procedures.

# 3. Definitions

- **Safeguarding-** The actions which we take and measures we put in place, guided by statutory obligations, to promote the welfare of learners and protect them from harm.
- **Prevent duty-** The responsibility under the Counter-Terrorism and Security Act 2015<sup>1</sup> that in the exercise of our functions as a specified authority, we must have “due regard to the need to prevent people from being drawn into terrorism”. UCEM views its Prevent duty as an extension of its safeguarding obligations.
- **Child-** In accordance with the Children Act (1989), a child is defined as a young person under the age of 18. For the purpose of this document, a child may also be referred to as a ‘young person’.
- **Vulnerable adult-** For the purpose of this process document, a vulnerable adult is someone who requires community care due to reasons of mental or other disabilities, age or illness, and who may be unable to take care of themselves, or protect themselves against significant harm or exploitation.

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<sup>1</sup> Revised Prevent Duty Guidance for England and Wales – Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (revised July 2015).

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- **Extremism** – vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – the process by which a person comes to support terrorism and extremist ideologies associated with terror groups.
- **Terrorism** – an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public, and is made for the purpose of advancing a political, religious or ideological cause.

For a full list of definitions see Appendix A, and for a list of definitions of acronyms used throughout this Code of Practice and its related procedures, see Appendix B.

## 4. Safeguarding

### 4.1 Approach

UCEM is committed to safeguarding and promoting the welfare of all students, staff, visitors and guests, and acknowledges its responsibilities to young people and vulnerable adults accessing education. To achieve this, UCEM will ensure that:

- All staff are made aware of their responsibilities in relation to safeguarding young people and vulnerable adults, both during face-to-face delivery and through online learning;
- An environment is provided where all students feel safe, secure, valued and respected, and that their health, safety and welfare is placed as one of its highest priorities;
- A culture is created where students feel confident to approach staff within UCEM if they have any difficulties, and feel confident that they will be listened to;
- Students know how to approach staff within UCEM if they have any concerns that they wish to raise;
- Robust procedures are in place for dealing with concerns, allegations or disclosures of abuse, bullying, forced marriage, female genital mutilation or vulnerability to radicalisation;
- Training and guidance is provided to staff in Safeguarding and Prevent, including the recognition of abuse, neglect, bullying, forced marriage, female genital mutilation and vulnerability to radicalisation;
- All staff working with young people and vulnerable adults at UCEM have been safely recruited, and appropriate checks of all staff (including volunteers) are undertaken (see Appendix C);
- An approach to safeguarding is taken that is aimed at reducing risk and promoting safety across UCEM, with clear policies and procedures that are embedded across the UCEM community;
- UCEM and its staff have and understand their individual and collaborative duty to ensure that their responsibilities to safeguard learners are fulfilled, and that they are responsible for acting on concerns no matter how small or trivial they may seem;

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- Parents/guardians/carers of learners aged under 18 will be informed of the existence and whereabouts of the Code of Practice: Safeguarding and Prevent, and its associated procedures, and the possibility that referrals may be made to other professional agencies in the interests of child protection and the protection of vulnerable adults;
- Learners are informed about the standard of behaviour that they can expect from UCEM staff and volunteers, and the procedures for reporting if they experience or suspect abuse;
- They work with local agencies, including Local Safeguarding Children's Boards (LSCB's) as appropriate;
- Procedures and policies designed to prevent or notify of suspected abuse, or vulnerability to radicalisation, are updated regularly;
- Staff adhere to the Safeguarding Code of Conduct, which is in Appendix D;
- A risk assessment and action plan is regularly completed and implemented;
- Information is shared appropriately when it is necessary for child protection, or to protect vulnerable groups;

Further details on how UCEM manages its Safeguarding provision, and for how to report a concern can be found in the UCEM Safeguarding Procedure.

## **4.2 Roles and responsibilities**

All staff members within UCEM have a responsibility for contributing to a culture in which Safeguarding and Prevent are discussed openly and actions are taken to reduce the likelihood of risks.

The UCEM Board of Trustees has formal responsibility for the safeguarding of young people and vulnerable adults at UCEM. The details of the board member with oversight for Safeguarding can be found in Appendix E.

All Further Education providers are required to have a Designated Safeguarding Lead (DSL), who is a member of staff assigned to act upon child and vulnerable adult protection concerns.

Names of the DSL's can be found within Appendix E. The responsibilities will be:

**DSL-** Oversight and management of UCEM's safeguarding arrangements and overall safeguarding caseload.

**HR DSL- Oversight and management of any cases involving an allegation against a UCEM employee.**

**Senior Leadership DSL-** Reporting to the senior leadership team and Board of Trustees on the work of the DSL for Students and the Safeguarding Officers. Responsibility for budget.

The DSL's are required to know:

- How to spot the signs of abuse, and at which stage a referral is required
- Local Child and Vulnerable Adult protection procedures, and where the DSL's role fits within these
- The role and responsibilities of relevant investigating agencies, and how to liaise with them
- Record keeping requirements
- The conduct of a child protection conference, and of the core group, and how the DSL or other members of staff may contribute to these.

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**Safeguarding officers-** responsibility for investigating and managing individual caseloads, under the oversight of the DSL. The Safeguarding officers are required to know:

- How to spot the signs of abuse, and at which stage a referral is required
- How to report cases to the Local Authority (LA) or emergency services if the DSL is unavailable
- Record keeping requirements

All members of staff with responsibilities for Safeguarding and Prevent can be contacted by emailing [safeguarding@ucem.ac.uk](mailto:safeguarding@ucem.ac.uk).

### **4.3 Referral and reporting**

Both students and staff are asked to refer any safeguarding concerns that they have or suspect to a member of the safeguarding team, using the process set out in the Safeguarding Policy.

UCEM will investigate all cases that it receives, and may refer these onwards to external agencies if required.

## **5. Prevent**

### **5.1 Approach**

UCEM is committed to making a contribution towards the protection of students from radicalisation to extremism, and its fulfilment of its duties under the Prevent duty as set out in the Prevent Duty Guidance (2015). UCEM views its duties under Prevent as an extension of its Safeguarding duties.

UCEM will preserve equality and diversity as foundations of UCEM and will facilitate students to become resilient to extremism, through the formation of strong communities support students who may be vulnerable to being drawn into violent extremism. UCEM will also continue to champion the spirit of academic freedom and freedom of speech set out in our Freedom of Speech Policy.

During the radicalisation process it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity. UCEM acknowledges that any individual could be susceptible to radicalisation, and that the process is not specific to any group or section of society, including those with any protected characteristic.

There are certain behavioural signs which may indicate vulnerability to radicalisation, or that a person has undergone, or is undergoing, the radicalisation process:

- Owning or distributing extremist materials
- Expressing extremist views
- Sympathising with extremist causes
- Behavioural changes, such as becoming withdrawn
- Advocating violence
- Use of discriminatory language or actions towards specific groups of people
- Showing or sharing materials online which is of an extreme nature
- Attempting or planning to recruit others to an extremist group or ideology

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UCEM offers support services to students through the academic team (including Programme Leaders, Module Leaders and Module Tutors), as well as Student Services, including the provision of a Safeguarding Lead. Where a student shows a change in behaviour, including activity on the Virtual Learning Environment (VLE), UCEM will follow up and support the student as required, to check for welfare concerns and offer support. This may include where it has been identified there is a possibility of a student being radicalised.

UCEM adheres to CONTEST, the government's Counter-Terrorism Strategy, and seeks support from its relevant Prevent lead from the Department for Education and other relevant contacts where this is deemed appropriate and necessary.

For more information on how UCEM handles Prevent concerns, please see the Prevent Procedure.

## **5.2 Roles and responsibilities**

The DSL will manage all individual Prevent related cases. If a decision is made to refer a case onwards, the DSL will do this in consultation with the Deputy CEO and Vice-Principal-Strategy and Business Management.

The DSL will provide a quarterly report to SLT on Prevent, and this information will be made available to the Board of Trustees.

The Deputy CEO and Vice-Principal- Strategy and Business Management will have overall responsibility for Prevent, which will include providing the annual report to HEFCE.

## **5.3 Referral and reporting**

Both students and staff are asked to refer any concerns they have about a member of staff or student that is at risk of being radicalised or drawn into extremism or terrorism. It is important that any concerns are shared in a safe and supportive manner, to enable concerns to be investigated and any appropriate intervention to be developed. There are separate processes for students and staff to raise concerns (see related policies and guidance).

UCEM will investigate any reported issues through speaking with students or members of staff, where appropriate, to gather further information. All concerns will be considered thoroughly and fairly.

If a concern is deemed to be valid, UCEM will work closely with representatives from the Department of Education, which may include recommending that someone is referred to the Channel Programme. The Channel is an early intervention, multi-agency process designed to safeguard vulnerable people from being drawn into extremism.

## **5.4 External Speakers**

UCEM has an External Speakers Policy which sets out the approval process for booking external speakers, and a code of conduct for all speakers. A proportionate risk-based approach is used to assess external speakers, to ensure that UCEM does not use speakers where there is any risk that they will encourage or promote terrorism or seek to incite hatred or violence against others.

## **6. Confidentiality**

The degree of confidentiality will be decided by the need to protect the student or member of staff. There may be instances where UCEM is sufficiently concerned about the health, safety or welfare of an individual that it will need to share the concerns with external agencies. UCEM employees may also need to share information internally, in order to safeguard its learners effectively. In so doing, UCEM will share sufficient and relevant information in order to allow the concern to be appropriately followed.

UCEM's approach to Data Protection is set out in its [Data Protection Policy](#).

## **7. Monitoring and review**

This Code of Practice will be reviewed at least annually by the DSL in accordance with the guidance 'Keeping Children Safe in Education (2016, and future updates)' and 'Prevent Duty Guidance: for England and Wales', with the updated policy presented to the Board of Trustees for approval.

A monthly report summarising any incidents and other matters related to the scope of this policy will be provided to the DSL by the wider members of the safeguarding team. The DSL will prepare a report on the matter for the Board of Trustees, which will form part of the six monthly compliance report to the board.

## **8. Benchmarked Policies and Guidance**

The following acts or documents impose statutory obligations upon UCEM (for a more detailed explanation, please see appendix F):

- The Children Act 1989
- The Children Act 2004
- The Protection of Children Act 1999
- Working Together to Safeguard Children 2015
- Education Act 2002
- Safeguarding Children and Safer Recruitment in Education 2007
- Counter-Terrorism and Security Act 2015
- Keeping Children Safe in Education 2016
- Safeguarding Vulnerable Groups Act 2006
- The Sexual Offences Act 2003
- Safeguarding Children: Guidance for English Higher Care Institutions (HEIs) 2007
- The Protection of Freedoms Act 2012
- The Care Act 2014
- Care and Support Statutory Guidance 2016
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Prevent Strategy 2011
- Prevent Duty Guidance 2015

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This policy should be read in conjunction with the following policies, procedures and guidance documents, which set out details that relate to key aspects of UCEM's approach to safeguarding:

- Staff Safeguarding Code of Conduct;
- Safeguarding Procedure
- Prevent Procedure
- Online Safety Guidance
- Student Bullying and Harassment Policy and Procedures;
- [IT Acceptable Use Policy \(staff\)](#);
- [Student Online Protocol \(A guide to using the VLE\)](#);
- Recruitment Policy (staff)- [Part 1](#) and [Part 2](#);
- UCEM Code of Practice Chapter: Admissions and Recognition of Prior Learning (relating to the recruitment of students with criminal convictions)- [Higher Education](#) and [Further Education](#);
- [Complaints Policy and Procedures](#);
- [UCEM Code of Practice Chapter: Disability and Additional Needs](#);
- [Privacy Policy and Data Protection Policy and Procedures, including Retention Schedule](#);
- [Whistleblowing Policy \(staff\)](#);
- [UCEM Freedom of Speech Policy](#);
- [UCEM External Speaker Policy and Referral Form](#);
- [Code of Practice: Equality and Diversity](#)

Relevant for face-to-face sessions (on or off-site)

- [Health and Safety Policy and Procedures](#);

# **Appendices**

Appendix A- Safeguarding Example Concerns and their Definitions

Appendix B- Glossary of Acronyms

Appendix C- DBS Disclosures

Appendix D- Staff Safeguarding Code of Conduct

Appendix E- Staff Responsibilities

Appendix F- Statutory Frameworks