

# **UCEM Code of Practice**

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## **Safeguarding and Prevent**

Version: 10.00  
Status: Final  
Date: 03/06/2024

**UCEM Code of Practice  
Safeguarding and Prevent**

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## Safeguarding and Prevent

### 1. Introduction

This Code of Practice chapter 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 chapter on Safeguarding and Prevent is applicable to all staff (including volunteers and temporary staff), students (including apprentices) and trustees. More information on how to report concerns or access support can be found with UCEM's [Safeguarding Procedure](#) and [Prevent Procedure](#).

### 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 from 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 and children 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 students 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** – the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2)<sup>3</sup>
- **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 with 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.
- **Freedom of Speech**- the freedom to impart ideas, opinions or information (referred to in Article 10(1) of the European Convention on Human Rights as it has effect for the purposes of the Human Rights Act 1998) by means of speech, writing or images (including in electronic form). Freedom of speech within the law is protected. Unlawful speech is not protected.

For a full list of definitions see [Appendix A](#), and for a list of definitions of acronyms used throughout this Code of Practice chapter 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, including allegations or disclosures of abuse, bullying, sexual harassment and misconduct, forced marriage, female genital mutilation, vulnerability to radicalisation or any other welfare or safeguarding concerns- an individual approach to supporting students is put in place depending on the issue;
- Training and guidance is provided to staff on Safeguarding and Prevent, including the recognition of abuse, neglect, bullying, online safety, anti-bullying, harassment and sexual misconduct, domestic abuse and vulnerability to radicalisation;

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- 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. More information can be found in UCEM's Recruitment Policy;
- 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 understand their individual and collaborative duty to ensure that their responsibilities to safeguard students are fulfilled, and that they are responsible for acting on concerns no matter how small or trivial they may seem;
- Students 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;
- UCEM works with local agencies, including Local Safeguarding Children's Boards (LSCB's) and Department of Education Prevent Co-ordinator as appropriate;
- Procedures and policies designed to prevent or notify of suspected abuse, or vulnerability to radicalisation, are updated regularly;
- Staff adhere to the Code of Conduct (non-contractual)- Part 2: Safeguarding, which is in [Appendix C](#);
- Regular updates are sent to staff on safeguarding and prevent;
- 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;

In addition to the above, UCEM applies some additional safeguarding measures for its apprentice students:

- UCEM checks and reviews the health and safety of apprentices whilst they are learning with their employers;
- Safeguarding and Prevent are discussed regularly with apprentices at their review visits;
- In addition to usual Safeguarding reporting requirements, certain concerns are also reported to the ESFA (concerns regarding allegations of abuse against a member of staff, or concerns relation to sexual violence which UCEM have referred to the Local Authority, police and/or adult/children's social care).

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 D](#).

UCEM has 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 D](#). The responsibilities will be:

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

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**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 role at UCEM follows the role outline as detailed in Keeping Children Safe in Education:

- *Lead person in the organisation responsible for safeguarding*
- *Title should be explicit in Job Description and Structure*
- *Status and authority to carry out the duties of the post*
- *Should be given time, funding, training and resources to support and train staff*
- *Ensure that students are aware of the risks and how to keep themselves safe*
- *Working with partners, including taking part in inter-agency meetings if required*
- *Manage referrals including Channel referrals*
- *Support staff who make referrals (feedback)*
- *Ensure secure records are kept*
- *Refer cases of staff dismissal due to safeguarding concerns to DBS and LADO*
- *Ensure they (or a deputy) are available during working hours to discuss any safeguarding concerns*
- *Raising awareness on safeguarding issues across the organization*
- *Understand the views of students, encouraging a culture of listening amongst staff*

(KCSIE 2023)

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.

**Safeguarding officers-** Have 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).

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#### **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 Procedure \(opens new window\)](#).

UCEM staff can also refer to the Local Authority themselves, should they not feel that the Safeguarding team have acted appropriately (see Safeguarding Procedure for information on how to make these referrals).

UCEM will investigate all cases that it receives and may refer these onwards to external agencies if required. As well as referring concerns about students, UCEM will also make referrals on behalf of children if appropriate, where it is made aware that there is a potential risk to any child.

## **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 actively promote equality and diversity and form strong communities to 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. For more information on how UCEM approaches freedom of speech, please see section 8 of this Code of Practice.

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.

UCEM offers support services to students through the academic team (including Programme Leaders, Module Leaders and Module Tutors), Apprenticeship Outcomes Officers for apprentice students, 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.

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UCEM adheres to CONTEST, the government's Counter-Terrorism Strategy, and seeks support from the Regional Prevent Co-ordinator in relation to 'local' and 'national' risks that may impact on UCEM's students and staff. UCEM has a Prevent Action Plan and Risk Register which are updated at least annually, and are reviewed by both the DFE Prevent Co-ordinator and the Office for Students.

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

#### **5.2 Roles and responsibilities**

The DSL or a nominated deputy will manage all individual Prevent related cases. If a decision is made to refer a case onwards, the DSL or deputy will do this in consultation with the Deputy Principal.

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 Principal will have overall responsibility for Prevent, which will include providing the annual report to Office for Students.

#### **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. For further details on the process for raising concerns please refer to the Prevent Procedure. 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 and will be referred externally as appropriate.

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. Channel is an early intervention, multi-agency process designed to safeguard vulnerable people from being drawn into extremism.

On occasion, UCEM may be notified of concerns about radicalisation or extremism for a person who is not a UCEM staff member or student. If this occurs, UCEM will pass concerns on to relevant local partners for investigation.

#### **5.4 External Speakers**

UCEM has an [External Speakers Policy \(opens new window\)](#) 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 extremism or terrorism or seek to incite hatred or violence against others.

#### **5.5 Monitoring and Filtering**

UCEM students are offered student email accounts. These accounts are filtered regularly to monitor for signs of extremist behaviour/activity or signs that a student has become radicalised or is attempting to radicalise others.

UCEM also monitors staff internet searches for signs of extremist behaviour/activity or signs that a student has become radicalised or is attempting to radicalise others.



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In cases where there is a serious welfare concern that is not related to Prevent, information may be passed to relevant parties and staff and/or students may be contacted to offer support.

## **6. Admissions**

Wherever possible, UCEM will endeavour to support applications from students with difficult personal circumstances, criminal convictions, or safeguarding concerns. UCEM welcomes applicants from diverse backgrounds.

However, there are certain instances (outside of those mentioned in UCEM's [Code of Practice chapter on Admissions and Recognition of Prior Learning – Higher Education Programmes \(opens new window\)](#)) where applications from potential students may be rejected, which may include:

- Where a potential applicant's behaviour towards UCEM, its staff or students, in any setting, leaves UCEM with serious concerns about its ability to support the applicant to successfully complete their studies;
- Where UCEM feels that accepting an application from a potential student may place the wellbeing, health or safety of the applicant or UCEM's staff and students at risk;
- Where UCEM feels that, due to the nature of the student's circumstances, it will not be able to effectively support a student to successfully complete their studies;

Applications from students for whom the above applies will be reviewed by the DSL and SLT DSL. A risk assessment will be conducted, and decisions will be presented to the executive board for review and approval. On occasions, applicants may be required to accept additional conditions to be accepted to study on a UCEM programme.

Any student who wishes to appeal a decision regarding the outcome of their application can do so by following the [Student Appeals Procedure \(opens new window\)](#).

## **7. Confidentiality and Consent**

Wherever possible, cases referred to the Safeguarding team will remain confidential. 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 students effectively.

Consent will usually be gained from a student before sharing information with any third parties. The exceptions to this include where there are significant concerns about the wellbeing of a child or in urgent or emergency situations, including where it is necessary to share information in order to prevent loss of life or serious physical, emotional or mental harm. UCEM's approach to Data Protection is set out in its [Data Protection Policy \(opens new window\)](#).

Cases received by the Safeguarding team are logged and recorded confidentially. These logs are viewable to members of UCEM's Safeguarding team, and Safeguarding cases may be discussed between [Safeguarding team members](#). Cases will not usually be discussed with members of staff outside the Safeguarding team without the consent of the student, except in emergency situations.

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## 8. Freedom of Speech

UCEM believes that everyone has the right to freedom of expression and acknowledges that freedom of speech within the law is protected. UCEM will have regard to its duty to ensure freedom of speech and recognises the importance of academic freedom. Unlawful harassment or unlawful incitement to hatred or violence does not constitute free speech within the law and is not protected. Where UCEM has sufficient concerns that a student's views or expressions indicate that they may have been radicalised or are extremist in nature, UCEM will seek advice and make referrals as appropriate, following the steps set out in UCEM's Prevent Procedure.

Please note that this statement should be read in conjunction with UCEM's Freedom of Speech Policy and is not intended to undermine or conflict with this policy. If any conflicts occur, the Freedom of Speech Policy will take precedence.

## 9. Monitoring and review

This Code of Practice chapter will be reviewed at least annually by the DSL in accordance with the guidance 'Keeping Children Safe in Education (2020, 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.

## 10. Benchmarked Policies and Guidance

The following acts or documents impose statutory obligations upon UCEM (for a more detailed explanation, please see [Appendix E](#)):

- The Children Act 1989
- The Children Act 2004
- The Protection of Children Act 1999
- [Working Together to Safeguard Children 2015](#)
- Education Act 2002
- Counter-Terrorism and Security Act 2015
- Keeping Children Safe in Education 2022
- Safeguarding Vulnerable Groups Act 2006
- The Sexual Offences Act 2003
- 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: for higher education institutions and England and Wales 2021](#)
- Ofsted: Inspecting safeguarding in early years, education and skills (2022)
- Ofsted: Further education and skills handbook (2023)
- [Office for Students: Student wellbeing and protection](#)

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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 \(opens new window\)](#)
- [Prevent Procedure \(opens new window\)](#)
- [Online Safety Guidance \(opens new window\)](#)
- [Anti-bullying, Harassment and Sexual Misconduct Procedure for Students](#)
- [Student Online Protocol \(A guide to using the VLE\) \(opens new window\)](#);
- [Recruitment Policy \(staff\) - Part 1 \(opens new window\)](#) and [Recruitment Policy \(staff\) - Part 2 \(opens new window\)](#)
- [UCEM Code of Practice Chapter: Admissions and Recognition of Prior Learning \(relating to the recruitment of students with criminal convictions\) - Higher Education \(opens new window\)](#)
- [Student Complaints Policy \(opens new window\)](#)
- [UCEM Code of Practice Chapter: Neurodiversity Disability and Wellbeing \(opens new window\)](#)
- [UCEM Data Protection Policy \(opens new window\)](#)
- [Whistleblowing Policy \(staff\) \(opens new window\)](#)
- [UCEM Freedom of Speech Policy \(opens new window\)](#)
- [UCEM External Speaker Policy and Referral Form \(opens new window\)](#)
- [Code of Practice: Equality and Diversity \(opens new window\)](#)
- [Student Appeals Procedure \(opens new window\)](#)

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## **Appendices**

- [Appendix A- Safeguarding Example Concerns and their Definitions](#)
- [Appendix B- Glossary of Acronyms](#)
- [Appendix C- Code of Conduct \(non-contractual\)- Part 2: Safeguarding](#)
- [Appendix D – Safeguarding Apprentices](#)
- [Appendix E- Statutory Frameworks](#)