

UNIVERSITY OF KENT
SAFEGUARDING POLICY AND
PROCEDURE

Appendices

Appendix 1: Relevant Policies and Procedures

[DHSC Care and Support Statutory Guidance \(Updated June 2020\)](https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance)

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

[Equality Act 2010: Guidance](https://www.gov.uk/guidance/equality-act-2010-guidance)

<https://www.gov.uk/guidance/equality-act-2010-guidance>

[ICO Guide to the UK General Data Protection Regulation \(UK GDPR\)](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/)

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

[NSPCC Keeping Children Safe:](https://www.nspcc.org.uk/keeping-children-safe/)

<https://www.nspcc.org.uk/keeping-children-safe/>

[Office for Students Counter-terrorism – the Prevent Duty](https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/)

<https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/>

[Ofsted: Inspecting Safeguarding](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828763/Inspecting_safeguarding_in_early_years__education_and_skills.pdf)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828763/Inspecting_safeguarding_in_early_years__education_and_skills.pdf

[Regulations for IT and Library use at Kent](https://www.kent.ac.uk/is/regulations/)

<https://www.kent.ac.uk/is/regulations/>

[Safeguarding Adults NHS England](http://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf)

<http://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>

[University of Kent DBS Policy and Procedure](https://www.kent.ac.uk/hr-staffinformation/policies/crb.html)

<https://www.kent.ac.uk/hr-staffinformation/policies/crb.html>

Appendix 2: Safeguarding Reporting Form

Local Safeguarding Officer Safeguarding Reporting Form

This form is to be used by Local Safeguarding Officers to record and report a concern to the University's Deputy/Senior Safeguarding Officer.

Local Safeguarding Officers should complete the form and send it to the appropriate safeguarding contact (see contact list). Referrals can also be taken over the phone. Information that identifies the personal details of staff/students should (if possible) be sent via a secure email or as a password protected document.

1. Local Safeguarding Officer's name:	
Job Title:	
Contact details (address, email and contact number):	

2. Name of individual :	
Age (delete as necessary): Under 18/ 18 years or over	Kent ID (if current student):
Home Address:	Term addresses:
Postcode:	Postcode:
Telephone Number/s:	
Course/activity:	

3. Details of alleged incident/concern:	
Date reported:	
Name of reporting person:	Job Title/Role:

Details of incident/concern (what the individual said, what someone told you, physical signs or behavioural indicators):

Details of any immediate action taken (the response, what was said to the individual, who else has been told):

4. Declaration (Local Safeguarding Officer to sign and date the incident form)	
Print name	
Sign	Date

Please email this the same day to Safeguarding@kent.ac.uk marked 'Private and Confidential: Safeguarding'. In case of urgency, please call campus security on 01227 823333 and ask them to alert the on-call person in Student Services to a report being made.

5. To be completed by the Deputy/Senior Safeguarding Officer	
Referral to external agency	Yes/No
If yes, details of agency, including contact name, title and telephone number	
Date and time of referral	
Further action taken/agreed	
Print name	
Sign	Date

Appendix 3: Key Contacts

Key Contacts

Strategic Lead for Safeguarding

Name	Role	Email address	Telephone number
Professor Richard Reece	Deputy Vice Chancellor for Education and Student Experience	R.J.Reece@kent.ac.uk	01227 (8)16038

Senior Safeguarding Officer

The Senior Safeguarding Officer should be contacted by members of staff who need advice or have any safeguarding concerns. Their contact details are as follows:

Name	Role	Email address	Telephone number
Dr Lucy Foley	Director of Student Services	Directorofstudentservices@kent.ac.uk L.M.Foley@kent.ac.uk	01227 (82)3119

Deputy Safeguarding Officers

The Deputy Senior Safeguarding Officer will assume the responsibilities of the Senior Safeguarding Officer in the absence of the Director of Student Services. Their contact details are as follows:

Name	Role	Email address	Telephone number
Lee Fellows	Deputy Director of Student Services and Head of Student Support and Wellbeing	HeadofSSW@kent.ac.uk L.Fellows@kent.ac.uk	01227 (82)4522
Dr Jo Ross-Gower	Head of Student Mental Health and Wellbeing	J.Ross-Gower@kent.ac.uk	01227 (82)3158

PREVENT

The University's designated lead for PREVENT is the Policy Adviser in the Office of the Vice-Chancellor (OVC).

Name	Role	Email address
David Powell	Policy Adviser, OVC	prevent@kent.ac.uk

Local Authority Designated Officer contacts (LADO)

LADO Officers provide advice and guidance to employers and voluntary organisations that have safeguarding concerns about a person working or volunteering with children and young people who may have behaved inappropriately or if information has been received that may constitute an allegation.

Contact details for reporting concerns to Kent County Council Social Services:

Website : <https://www.kent.gov.uk/social-care-and-health/report-abuse>

Email: Social.services@kent.gov.uk

Phone : 03000 416161 (adults at risk)

03000 411111 (children)

03000 419191 (out of hours)

Contact details for reporting concerns Medway Council Social Services:

Website : https://www.medway.gov.uk/info/200139/social_care_and_health

Phone : 01634 334 466 (adults at risk or children)

03000 419191 (out of hours)

Appendix 4: Keeping Apprentices Safe

Ofsted is responsible for inspecting providers that receive apprenticeship funding from the Education and Skills Funding Agency (ESFA). As part of its inspection activity, Ofsted will always make a judgement about whether the arrangements for safeguarding young people and learners at a provider offering apprenticeships are effective. This section, which sets out how the University meets its safeguarding responsibilities in relation to work-based learning, should be read in conjunction with the University's Safeguarding Policy and Procedure.

University of Kent's commitment

We are committed to ensuring the highest levels of safety and wellbeing for all apprentices, and this is achieved by working in partnership with employers and host-employers (collectively referred to as 'employers' from here on).

At the University of Kent, safeguarding responsibilities for apprentices are overseen by Local Safeguarding Officers (LSO) in Global and Lifelong Learning (GLL). They implement the University's Safeguarding Policy, and actively participate in its promotion and review.

The University of Kent's safeguarding responsibilities

- to ensure that the University's Safeguarding Policy is adhered to in relation to apprentices.
- to ensure that employers are aware of current UK legislation and statutory responsibilities.
- to ensure that all apprentices are aware of safeguarding and duty of care and understand how to access university support services.
- to provide safeguarding training to all of the University's LSOs working with apprentices.
- to ensure the highest levels of safety and wellbeing for apprentices by ensuring all staff with apprenticeship responsibilities are aware of their safeguarding responsibilities through regular refresher training. This will be delivered by GLL.
- to ensure open communication exists with employers.
- to consider the apprentices' health, safety and wellbeing, including their mental health
- to ensure safeguarding is promoted as part of the apprenticeship induction and embed these through Progress Reviews, apprentice handbooks, bulletins and within the course resources.
- to investigate any safeguarding concerns identified in accordance with this procedure, recognising appropriate boundaries.

Employers' safeguarding responsibilities

- to comply with current UK legislation and statutory responsibilities.
- to take responsibility for an apprentice's welfare in the workplace, and to seek appropriate advice should there be concerns that an apprentice may be at risk in their personal lives.
- to ensure that people working with apprentices are appropriate for the role and, if working with young and/or vulnerable people/adults at risk, are subject to an enhanced DBS check where appropriate. This should be checked in line with [gov.uk DBS eligibility guidance](https://www.gov.uk/guidance/dbs-check-eligibility-guidance)

Prevent Duty:

In line with the [Counter-terrorism and Security Act of 2015](https://www.legislation.gov.uk/ukpga/2015/22/section/1), The University of Kent pays 'due regard to the need to prevent individuals from being drawn into terrorism'.

There are numerous ways in which an individual may be exposed to extremist ideology, including being influenced by family, friends or relationships they make online.

The Prevent duty has three main objectives:

- to respond to the ideological challenge of terrorism and the threat faced from those who promote it.
- to prevent people from being drawn into terrorism and give them advice and support.
- to work with sectors and institutions where there are risks of radicalisation.

The University of Kent's Response to the Prevent Duty:

- At the University of Kent, the Prevent duty is considered mainly in the context of our [Safeguarding Policy](#).
- The University of Kent has a [Code of Practice](#) concerning Freedom of Speech, External Speakers and Events.
- The University of Kent's Prevent Steering Group is responsible for overseeing the University's response to its obligations under the 2015 Counter Terrorism and Security Act.
- A Prevent risk assessment and action plan is in place and is updated annually.
- A data return and accountability statement are submitted annually to the Office for Students.
- The University of Kent has representation on the Kent Prevent Duty Delivery Board.
- In-house training sessions are delivered to increase staff awareness of Prevent. This equips our staff with the knowledge to embed such topics throughout discussions and classroom activity
- An up-to-date register of the LSOs and other members of University staff who have undertaken Prevent training is maintained. In the event that an apprentice was considered to be at risk an LSO from GLL would be the first point of contact.
- The University ensures that the Prevent Duty is promoted as part of the apprenticeship induction and is committed to embedding understanding through Progress Reviews, apprentice handbooks, bulletins and within the course resources.
- The University is committed to increasing our apprentices' resilience to extremist narratives by increasing their awareness in such topics and by providing them a safe space to discuss such issues.
- Any Prevent concerns raised, will be investigated in accordance with this procedure, recognising appropriate boundaries.

The Employers' responsibilities

- to understand the principles underpinning the Prevent Duty.
- to be alert to any changes that give cause for concern.
- to provide opportunities for employees to discuss their own concerns about extremism, events in the news and British values.
- to seek specialist support, including support from The University of Kent, if any concerns are raised.

British Values:

British values, as defined by the Counter-terrorism and Security Act 2015 are:

- **Democracy**
- The rule of **law**
- Individual **liberty**
- Mutual **respect**
- **Tolerance** for those with different faiths and beliefs

The University of Kent's responsibilities:

- to ensure British values, as defined by the Counter-terrorism and Security Act 2015, are promoted throughout the apprenticeship programme.
- to encourage apprentices to respect others and their differences, including protected characteristics defined in the [Equality Act of 2010](#)

The Employers' responsibilities:

- to demonstrate, where possible, a commitment to British Values, as defined by the Counter-terrorism and Security Act 2015.

Staying Safe Online:

Use of the internet and digital technology is part of most people's everyday lives. Kent uses the internet to support its provision of apprenticeships. It is essential that apprentices have the knowledge and skills to use the internet safely and appropriately.

Staying safe online includes ensuring the security of personal and employers' data and also being aware of the dangers of:

- Bullying
- Harassment
- Grooming
- Revenge porn
- Identity theft
- Viruses

The University of Kent's responsibilities

- to provide apprentices with guidance on what is and is not an acceptable use of the internet at their place of work and University.
- to ensure University of Kent staff know how to manage concerns raised regarding the use of University IT systems in-line with the University's [Regulations for IT and Library use at Kent](#) .
- to provide a contact(s) for further information and guidance on Staying Safe Online (currently the Local Safeguarding Officers (LSOs) in GLL).
- to ensure relevant University staff are familiar with the University's [stay safe online guidance](#) to ensure they understand how apprentices may be at risk using the internet.
- to ensure apprentices develop an objective attitude to online information and critically appraise its authenticity.
- to investigate any potential breaches of IT regulations using the relevant University disciplinary procedures.

The Employers' responsibilities

- to ensure apprentices are aware of organisational policies relating to internet use at work.

- to seek internal specialist IT support or support from The University of Kent. (see apprenticeship contacts below) if any safeguarding or duty of care concerns are identified or raised.

IT Monitoring

Under the University's [IT regulations](#), the University of Kent monitors and records the use of its IT facilities for the purposes of:

- effective and efficient planning and operation of the IT facilities;
- detecting and preventing infringement of these regulations;
- investigating alleged misconduct;
- monitoring how well facilities are working.

The University does not routinely monitor individual users' use of IT facilities and services. Staff and apprentices must not attempt to monitor the use of IT without the explicit permission of the Director of Information Services. The University has a procedure that regulates when and how monitoring is permitted, which includes:

- how we ensure compliance with GDPR,
- The Investigatory Powers (Interception by Businesses etc. for Monitoring and Record-keeping Purposes) Regulations 2018,
- and any other relevant legislation.

Monitoring would include:

- monitoring network traffic;
- network and/or device discovery;
- Wi-Fi traffic capture;
- installation of key-logging or screen-grabbing software that may affect users other than the user.

Where IT is itself the subject of study or research, special arrangements will have been made. Course leaders, research supervisors and Directors of Division can be contacted for more information.

In certain circumstances the University may be obliged to disclose information or undertake more detailed monitoring under the Regulation of Investigatory Powers Act 2000.

Safeguarding Warning Signs:

An apprentice may not always choose to seek help over an issue that would be considered under safeguarding, but there are common characteristics which may help identify a concern:

- **Absence** from work or reluctance to study/go online
- Changes in **physical appearance**
- Changes in **behaviour**/character (quiet, loud, aggressive, withdrawn)
- Changes in **emotional health** (crying, low mood, anxiety)
- Excessive **alcohol consumption**
- Use of controlled/illegal psychoactive substances
- Physical **injuries** (cuts, bruises) and **self-harm**

It is important to stress that this list of examples is not exhaustive, and existence of these signs is not a definitive indicator of a safeguarding concern. However, if an employer suspects an issue, we recommend making contact:

Who to contact:

If an apprentice or member of staff has an immediate safeguarding concern, they should contact the emergency services by telephoning 999. In case of urgency, please call campus security on 01227 823333 and ask them to alert the on-call person in Student Services to further action.

Global and Lifelong Learning are available 09:00 – 17:00 Monday – Friday using the below contact details. Any concerns raised outside office hours will be picked up when the office is open:

<i>Global and Lifelong Learning</i>	<i>Apprenticeships@kent.ac.uk</i>	<i>01634 888155</i>
<i>Betty Johnson LSO</i>	<i>dallaam@kent.ac.uk</i>	<i>07921 487652</i>
<i>Shareen Kelly LSO</i>	<i>s.a.kelly-40@kent.ac.uk</i>	<i>07725 745 656</i>

Appendix 5: Useful Definitions

University member: The term 'University member' is used to describe anyone who works (whether in a paid or unpaid capacity) with, or is otherwise engaged with University staff, students, children, young people or adults at risk on the University's behalf, whether as an employee, governor, contractor volunteer, nominated partner or student.

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).

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 eighteen who are still in full time education and 'young person' refers to those under the age of eighteen who have left full time education.

Vulnerable adult/adult at risk: An adult at risk is someone aged 18 years or over 'who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

Safeguarding: This is the term used to promote the welfare and protection from harm of young people or vulnerable adults/adults at risk. This term is broader than 'child protection' which refers to activities undertaken to prevent children suffering significant harm.

Abuse: This is a violation of human and civil rights by another person. It may be planned or unplanned and consist of a single act or repeated acts. Abuse can take many forms and includes but is not limited to:

- **Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm;
- **Neglect:** this involves continual failure to meet a person's basic physical and emotional needs, such as providing sufficient food, clothing and a safe home; 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 medication, adequate nutrition and heating;
- **Self neglect:** a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Sexual abuse:** involves forcing or persuading a person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. This includes rape and sexual assault or sexual acts to which the individual has not consented, or could not consent or was pressured into consenting;
- **Psychological abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;

- **Organisational abuse:** including neglect, poor care practice within an institution or specific care setting such as a hospital or care home, poor practice 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.
- **Domestic abuse:** including psychological abuse, physical abuse, sexual abuse, financial abuse, emotional abuse, so-called 'honour'-based violence.
- **Modern slavery:** including 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.
- **Financial or material abuse:** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits; and
- **Discriminatory abuse:** including
 - discrimination against individuals with disabilities, including those with mental health conditions, where they have specific support needs and as a result of those needs are unable to protect themselves against the risk of abuse or harm
 - transgender, non-binary and gender non-conforming students to be classified as vulnerable adults
 - racist, sexist, based on a person's religion, and other forms of harassment, slurs or similar treatment
- **Prevent Duty definitions:**
 - An *ideology* is a set of beliefs or principles, especially one on which a political or religious system, party or organisation is based.
 - *Radicalisation* is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
 - *Safeguarding* is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
 - *Terrorism* is an action that endangers or causes serious violence damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
 - *Vulnerability* describes factors and characteristics associated with being susceptible to radicalisation
 - *Extremism* is 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.

Appendix 6: Flowchart

