

University of Kent

Safeguarding Policy and

Procedure

OWNER: DR L. M. FOLEY, DIRECTOR OF STUDENT SERVICES

APPROVED BY: EDUCATION AND STUDENT EXPERIENCE BOARD: 27 APRIL 2021

SENATE: 9 JUNE 2021

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REVIEWED BY: LEE FELLOWS, DEPUTY DIRECTOR OF STUDENT SERVICES AND HEAD OF STUDENT SUPPORT AND WELLBEING

1. Purpose and Scope of the Policy

1.1. The University of Kent is committed to protecting **children** and **adults at risk** from harm, exploitation and abuse and to ensuring that all staff and students are aware of their responsibilities in relation to safeguarding, are alert to safeguarding concerns and know how to respond to those concerns.

1.2. This Policy sets out the University's approach to safeguarding **children** and **adults at risk**, whenever they are on campus and/or engaged in University activities and the type of action that the University may take in response to safeguarding concerns and to provide support. In other instances, when children, whether accompanying staff, students or visitors are present on the University campus, they remain the responsibility of their parent, carer or legal guardian.

1.3. The University has a responsibility to keep children and adults at risk safe to take appropriate safeguarding action in relation to signs and symptoms of abuse or neglect, which could include:

- Physical
- Psychological or emotional
- Sexual
- Domestic Violence
- Financial
- Neglect
- Discriminatory
- Institutional
- Modern slavery

1.4. This Policy will be reviewed every two years or when there is a significant change in legislation.

1.5. This Policy does not apply to activities undertaken by the Kent Union or GKUnions, which has separate safeguarding policies and procedures, although it does apply to University activities that take place on the Students' Union premises.

2. Underpinning Principles

2.1. The University of Kent is committed to taking all reasonable steps to promote and safeguard the welfare of all children and adults at risk who are accessing the institution's activities and services.

This includes:

- prospective students and apprentices
- current students and apprentices
- children and adults at risk engaging in University activities, including teaching, research and outreach activities
- children and adults at risk living in University accommodation
- external partners where University activities engage children or adults at risk e.g., volunteering and work experience.

2.2. Legal safeguarding duties apply to all children and young people under 18. **Where this policy mentions young people, this should be read as being under the age of 18 years.**

2.3. Legal safeguarding duties further apply to an 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.'

2.4. Safeguarding is everyone's responsibility. All staff and students who have contact with children and adults at risk should be alert to the possibility that a child or adult at risk may experience abuse or neglect. All concerns should be raised using the procedure set out in this document, but it is not the responsibility of staff or students to investigate or establish if abuse or neglect has taken place.

2.5. Safeguarding referrals to the relevant statutory authority will be proportionate and made on the basis of consideration of the identified risks, including consideration of the impact of the referral on those involved.

2.6. Making safeguarding personal means it should be person-led and outcomes-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. Adults with capacity (as defined by the Mental Health Capacity Act 2005) have the right to self-determination, including the right to make unwise decisions and/or not to engage with support.

2.7. When dealing with safeguarding concerns, confidentiality should never be guaranteed as information may need to be shared. However, confidential information will only be shared minimally or as required, where this is considered to be necessary and will only be shared with relevant third parties on a need to know basis.

2.8. When safeguarding children, the University's approach will be informed by Working Together to Safeguard Children 2018 (including the amendments introduced in 2020), which is the statutory guidance on inter-agency working to safeguard and promote the welfare of children. In particular, it will act to promote the welfare of children and protect them from harm.

2.9. The University will follow the six key principles that underpin adult safeguarding, as set out in the Care Act 2014;

Empowerment: People are supported and encouraged to make their own decisions and informed consent. *"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."*

Prevention: It is better to take action before harm occurs. *"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*

Proportionality: The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my best interest, as I see them, and they will only get involved as much as needed."*

Protection: To support and protect those in greatest need. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*

Partnership: Working collaboratively with other agencies. 4 *“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”*

Accountability: To be transparent about, and responsible for, our safeguarding practices. *“I understand the role of everyone involved in my life and so do they.”*

3. University Safeguarding Structure

3.1 The implementation of the policy will be overseen by the Deputy Vice-Chancellor for Education and Student Experience, who will ensure that the University of Kent is meeting its safeguarding responsibilities.

3.2 The University has identified clear leadership and lines of accountability to ensure the full implementation of this policy across the University. The University has designated a Senior Safeguarding Officer (SSO), two Deputy Safeguarding Officers (DSO) and Local Safeguarding Officers (LSOs) within Divisions and Directorates. (Contact details of the SSO and DSOs are available in Appendix 3, together with a link to the list of Local Safeguarding Officers).

3.3 The Senior Safeguarding Officer is the Director of Student Services. This individual is the University’s strategic lead for safeguarding and will ensure that the University’s policies, procedures, systems and general activities comply with current legislation and the University of Kent Safeguarding Policy. Their key responsibilities are to develop and implement policy and procedure to safeguard children and adults at risk who are engaged in University-related activities and to ensure that the policy is regularly reviewed and update, when required, and to ensure consistent implementation of the procedure throughout the University.

3.4 The Deputy Safeguarding Officers are the Deputy Director of Student Services and Head of Student Support and Wellbeing and the Head of Student Mental Health. They are the operational leads for safeguarding and the point of contact for communication with external agencies.

Their key responsibilities are:

- to determine if safeguarding concerns raised by someone in the University should be referred to an appropriate external authority.
- to refer concerns to social services, the police, or an alternative external agency, for the purposes of ensuring the safety of a child or adult at risk.
- to co-operate with other agencies to safeguard and promote the welfare of children and adults at risk.
- to establish and maintain links with relevant local authority departments and education institutions including OFSTED
- to develop and maintain effective reporting and recording systems including a Single Central Record (SCR)
- to raise awareness through the dissemination of policies and information across the University
- to oversee relevant training needs on safeguarding issues and procedures.

3.5 Local Safeguarding Officers (LSOs) should be appointed within Divisions and Directorates. Each Director of Division/Directorate should ensure that it has one LSO for each relevant service area. An LSO is a point of contact and support for staff and students to seek advice and raise concerns.

Their key responsibilities are:

- to provide first line support and advice on safeguarding issues.
- to highlight and promote best practice relating to safeguarding within their Division/Directorate.
- to oversee relevant training needs on safeguarding within their Division/Directorate, where required (e.g. student ambassadors).
- to establish and develop links with relevant organisations, where the Division/Directorate works with external partners, e.g., schools, colleges and apprenticeship student employers.

3.6 LSOs will be required to undertake training, as specified by the Senior Safeguarding Officer, prior to starting their role (e.g. from the NSPCC or alternative external provider. In addition, specific training will also be provided for activities which involve a high level of engagement with children (e.g., outreach activities). The SSO, DSO and LSOs are all responsible for ensuring that they undertake appropriate training, update knowledge and skills and keep up to date with relevant developments. LSOs with Degree Apprenticeship students will also complete Prevent and Safeguarding for all modules

3.7 While the LSOs will manage the safeguarding casework, the Director of Division/Directorate will be responsible for ensuring that:

- sufficient resources are available to deliver safeguarding commitments within their Division/Directorate.
- LSOs engage with training and refresher training, as required.
- appropriate risk assessments are undertaken for relevant activities within their Division/Directorate.
- appropriate DBS checks are undertaken for relevant staff/students/volunteers within their Division/Directorate.
- any safeguarding concerns are reported promptly to the LSO

4. Safeguarding Procedure

4.1 If staff become aware that a child or adult at risk is, or may be, experiencing abuse or neglect, they should promptly discuss this with their Local Safeguarding Officer (LSO) who will advise of next steps.

Situations that could trigger a safeguarding concern include:

- Witnessing harm/neglect.
- Disclosure of abuse or neglect, either current or historic.
- Reasonable suspicion (see Appendix 5 for definitions and signs of abuse and neglect).

4.2 Staff should not assume that someone else will take action. Staff should be aware that early sharing of information is often vital to enable an effective intervention that might keep a child or adult at risk safe.

4.3 In an emergency, or if a person is at risk of immediate harm, staff should contact emergency services or if on campus call Campus Security on 01227 823333.

4.4 Before taking further action, the LSO will first establish that the person identified as having a safeguarding concern meets the definition of being a child or adult at risk (see 2.2 and 2.3 above). If these definitions are not met but the person identified requires support, they will be referred to the appropriate internal or external services.

4.5 The LSO will, if required, complete a Safeguarding Report Form, a copy of which can be found in Appendix 2 or on the University website at: <http://www.kent.ac.uk/student-services/policies.html>

4.6 The LSO will provide a copy of the completed Safeguarding Report Form to the Deputy Safeguarding Officer, who will keep a record centrally of all reported concerns and outcomes on a secure electronic case management system in line with the University's [Document Retention and Archiving Policy](#). It should be assumed that such records may later be used in formal/legal proceedings, if required.

4.7 If there are immediate concerns of risk of harm or abuse, the Local Safeguarding Officer or Deputy Safeguarding Officer must be notified verbally straight away, and a Safeguarding Report Form completed as soon as reasonably possible thereafter.

4.8 Any concerns about the behaviour by a member of staff against a child or an adult at risk should be reported directly to the DSO, via the LSO, if available, and referred to Human Resources.

4.9 Any safeguarding concerns involving the Senior Safeguarding Officer or Deputy Safeguarding Officer should be taken to the Deputy Vice Chancellor for Education and Student Experience. Safeguarding concerns involving the Deputy Vice-Chancellor for Education and Student Experience should be raised with the Vice-Chancellor. Safeguarding concerns involving the Vice Chancellor should be taken directly to the Chair of Council.

4.10 If the person identified as having a safeguarding concern meets the definition of being an adult at risk, the principles set out in 2.9 above will be followed.

4.11 The DSO will take appropriate steps which could include one or more of the following:

- to consult with relevant colleagues to ensure all relevant facts have been gathered.
- to liaise with appropriate external partners e.g., appropriate staff in a school within which outreach activities are happening, a placement provider, an apprenticeship student's employer.
- to arrange for the individual to be given appropriate support via internal or external services.
- to make a referral to local social services.
- to contact the police.

4.12 It is important that accurate records are kept in relation to all safeguarding concerns that are raised. Where it is necessary to share information with other agencies in order to address the risk of harm, this will normally be done by the DSO or SSO, using the form in Appendix 2.

However, in an emergency situation, where risk is imminent, any member of staff can call Campus Security or emergency services. All records will be kept securely and retained only as long as necessary, in line with the University's retention schedule.

5. The Prevent Duty

5.1 The Prevent Duty forms Section 26 of the Counter-Terrorism and Security Act (2015), which places a statutory duty on 'specified authorities', including Universities, to have 'due regard to prevent people from being drawn into terrorism'.

5.2 The University regards its Prevent duty as part of its community safeguarding responsibilities to protect the welfare and safety of our students. The University provides pastoral and wellbeing support for students through the Divisions, College and Community Life Team and Student Service Teams.

5.3 Should any member of staff become concerned that a student is exhibiting extremist beliefs or behaviours and/or that they are at potential risk of exploitation by radicalisers they must share these concerns with their Local Safeguarding Officer or line manager.

5.4 In exceptional circumstances, for example, in cases where there might be a risk of immediate harm to an individual(s) or a third party, it would be open to Local Safeguarding Officer, Deputy Safeguarding Officer or a senior member of the University Campus Security staff, to consult directly with the Prevent Officer and/or Policy Adviser to the Vice-Chancellor about the need for direct contact with other external authorities (see Appendix 3 for Prevent contact details).

6. Prevention

6.1. DBS checks will be carried out for appropriate members of University staff, in line with the University's DBS policy.

6.2. Risk assessments will be carried out for organised activities on campus to ensure the safety of children and adults at risk.

6.3. Participation in research will be conducted in accordance with approval from relevant ethics committee.

6.4. Where relevant, written consent will be obtained from parents/carers (or another adult acting in loco parentis) with regards to activities involving children and young people, in particular:

- presence of children on campus without a responsible adult
- taking and publishing images of children

Appendix 1: Relevant Policies and Procedures

[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/>

[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>

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

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

[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/>

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

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

[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>

OFSTED SAGEGUARDING REQUIREMENTS

<https://www.gov.uk/government/publications/ofsted-safeguarding-policy/ofsted-safeguarding-policy>

Appendix 2- Local Safeguarding Officer 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):	

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

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4. Declaration (Local Safeguarding Officer to sign and date the incident form)

Print name	
Sign	Date

Please email this the same day to the Deputy Safeguarding Officer at HeadofSSW@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 Service 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)4130

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	01227 (82)3158
Vacant	Head of Student Mental Health		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: Safeguarding Guide - Keeping Apprentices Safe

To be read in conjunction with the University of Kent's Safeguarding Policy.

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 Deputy Safeguarding officer s meets termly for a safeguarding forum with local safeguarding officers in GLL to review update and discuss any safeguarding concerns.

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 apprenticeships by ensuring all staff with apprenticeship responsibilities are aware of their safeguarding responsibilities through regular refresher training. This will be delivered and managed 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 embedded these through Progress Reviews, apprenticeship 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/dbseeligibilityguidance)

Prevent Duty:

In line with the [Counter-terrorism and Security Act of 2015](#), 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:

- Respond to the ideological challenge of terrorism and the threat faced from those who promote it.
- Prevent people from being drawn into terrorism and give them advice and support.
- 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 systems for assessing and mitigating risks around [external speakers](#) and events on campus, while maintaining the existing duty to promote freedom of speech
- 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 topic throughout discussion 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 apprenticeship was considered to be at risk and 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, apprenticeship handbooks, bulletins and within the course resources.
- The University is committed to increasing our 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 Employer's 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 in relation to Apprenticeships:

In line with the [Counter-terrorism and Security Act of 2015](#), the Department of Digital and Lifelong Learning (DaLL) promotes British values. These are values that shape our society and are protected by law, through legislation including the [Equality Act of 2010](#).

British values:

- **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 Employer's 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](#)
- Provide a contact(s) for further information and guidance on Staying Safe Online (currently the ADSOs)
- 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 Employer's role

- Ensure apprentices are aware of organisational policies relating to internet use at work
- 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 or their nominated person. The University has a procedure that regulates when and how monitoring is permitted, which includes:

- How we ensure compliance with GDPR
- The Investigatory Powers (Intercepted by Business 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 urgent contact:

Who to contact

Global and Lifelong Learning	Apprenticeships@kent.ac.uk	01634 888155
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All LSOs are recorded on the Local Safeguarding Officers lists under the department Global and Lifelong Learning

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 vulnerable adults 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

