

**University Partnerships Europe (UPE)
Academic Registry
NPR M1a: Safeguarding Children and Vulnerable Adults
Version 2020/02**

1. Introduction

Navitas UPE is committed to providing a safe and secure environment for children and vulnerable adults. This Policy outlines how the College network seeks to deliver its social, ethical and legal responsibilities to protect and safeguard children and vulnerable adults to the highest possible standards.

A small proportion of the students admitted to Navitas UPE Colleges will be enrolled before they reach their eighteenth (18th) birthday. Navitas UPE, through its Colleges, has specific responsibilities towards those who are under 18 years of age, as they are classified as children under the Children's Act 1989. This document defines Navitas UPE policy for the treatment of international students under the age of eighteen years at the time of their enrolment. As most of these students will remain underage for a short time only it is the policy of the College to treat them as 'students' from the outset.

Students under the age of 18 years (17 years in Scotland) are legally considered minors in the UK and as such each College formally recognises their existence and accepts a higher level of responsibility for their educational, social and welfare provision under the Protection of Children's Act 1999 and 2004 for persons under 18 and the Further and Higher Education Act 1992. This higher level of responsibility is extended to vulnerable adults aged 18 or over who may be unable to take care of themselves against significant harm or exploitation.

Navitas UPE does not however act in *loco parentis* with the exception of cases of medical emergency or when a student is unable to make a decision for themselves and the next point of contact is unreachable and there is a need to act quickly. However, it should be noted that all students U18 years of age are required to have a UK guardian who will act in loco parentis for this cohort.

Navitas UPE is scrupulous in its safeguarding responsibilities. Key stakeholders in the UPE structure for safeguarding are as follows:

- Lead Safeguarding Officer (LSO): has overall accountability and strategic oversight for safeguarding vulnerable groups within the organisation. The LSO will delegate day to day responsibility to the College Director/Principal (CDP). The LSO for Navitas UPE is the Dean of Academic Operations (DAO)/EGM.
- Designated Safeguarding Leads (DSL): have operational responsibility for safeguarding vulnerable groups within Colleges. CDPs or their nominee are required to act as the DSL.
- Safeguarding Officer (SO): represent their College on the UPE Wellness, Health and Safety Committee and act as a point of referral for safeguarding concerns raised locally. It is acceptable for the DSL to discharge the duties of the SO but in this case the appointment of a Deputy DSL is recommended.

2. Navitas UPE responsibilities

- 2.1 Navitas UPE has specific legal responsibilities to ensure that children and vulnerable adults are safeguarded against the risk of harm and abuse.
- 2.2 Navitas UPE recognises that abuse or harm or the risk of abuse or harm to a child or vulnerable adult may take many different forms and that individuals may have different perceptions of what constitutes harm or abuse. Navitas UPE regards harm or abuse as including any physical, sexual or emotional abuse or neglect, bullying, harassment or intimidation. Further guidance on the forms that harm or abuse might take is at Annex A.
- 2.3 It is not the responsibility of Navitas UPE to investigate harm or abuse. However, it has a duty of care to act if there is cause for concern, to protect the welfare of children and vulnerable adults, and to notify the appropriate agencies about any concerns so that they can investigate.
- 2.4 The lead member of staff within Navitas UPE with responsibility for safeguarding children and vulnerable adults is the LSO, or in their absence, the CDP.

- 2.5 Navitas UPE will keep this Policy under review to ensure that children and vulnerable adults are safeguarded, and that this Policy complies with developments in legislation, regulations and good practice.
- 2.6 In line with the partner ethos, Navitas UPE will comply as closely as possible with policies and regulations of the Partner University, UKVI regulations, UKCISA and British Council guidelines.
- 2.7 Navitas UPE recognises that it has a duty to help staff and students through guidance, support and training in order to promote safe working practices to minimise risk to Under 18 and vulnerable individuals.

3. The Purpose of this Policy

- 3.1 This Policy sets out Navitas UPE's corporate arrangements for securing the safety and wellbeing of children and vulnerable adults who are on Navitas UPE's premises or who engage in activities controlled by Navitas UPE. It sets out the steps that Navitas UPE will take to ensure that concerns about a child's or vulnerable adult's wellbeing or risk of harm or abuse to them arising from activities connected with the Navitas UPE can be addressed quickly and appropriately, in accordance with statutory duties.
- 3.2 Some Colleges within Navitas UPE operate their own specific procedures for securing the safety and wellbeing of children and vulnerable adults in accordance with guidance from relevant professional or sponsoring bodies. Colleges are required to ensure that their own specific procedures comply with the requirements of this overarching corporate Policy.

4. Definitions

Navitas UPE uses the following definitions for the purposes of this Policy:

- 'Child' or 'children' refers to a person or persons under the age of 18 years. In Scotland, the definition of a 'child' varies according to the legal circumstances. Part 1 of the National guidance for child protection in Scotland explains that a child is generally defined as someone under the age of 18. But in some child protection contexts, including children's hearings and child protection orders, a child is someone who is under 16.
- 'Vulnerable adult' refers to a person who is aged over 18 years who is or may be in need of community care services for reasons of mental health or other disability, age or illness, and is or may be unable to take care of themselves or protect themselves against significant harm or exploitation.
- 'Safeguarding' refers to the arrangements made to ensure that all reasonable measures are taken to prevent harm to children and/ or vulnerable adults.
- 'Controlled posts' refers to posts that have frequent or intensive contact with children or vulnerable adults or have frequent access to sensitive information about children or vulnerable adults.
- 'Regulated activity' refers to activities and work that a person who has been barred by the Disclosure and Barring Service (DBS) must not do. It encompasses:
 - activity involving contact with children or vulnerable adults that is of a specified nature (e.g. teaching, training, care, supervision, advice, medical treatment or in certain circumstances transport) carried out on a frequent, intensive and/or overnight basis;
 - activity involving contact with children or vulnerable adults in a specified place (for example, schools or care homes), conducted either frequently or intensively;
 - fostering and childcare; and
 - certain specified positions of responsibility (for example, a school governor or the director of a health and social care trust responsible for the delivery of personal social services, and trustees of certain charities).

These are activities that, generally speaking, may place someone in a vulnerable position, for example, through a relationship of

trust or dependency.

5. Admission of Students

5.1 Introduction

No student under the age of 18 years [17 for Scotland] can be refused admission to a pathway of study under the Equality Age legislation of 2006. Throughout the admission process all applicants must be treated with equality and on academic and English language achievement grounds as the basis for entry to a pathway of study for international students under Tier 4. Where the Partner University has specific risk assessment requirements surrounding students on a course under 18 years of age, these should be consulted, discussed in full and agreed with the University prior to any admission being granted. Deferred entry to a pathway will be granted where appropriate.

All applicants under the age of 18 years at their time of enrolment are required to inform the College of all/any disabilities or intermittent/ongoing medical conditions at the time of admission.

Navitas UPE further requires, that parents/legal guardians sign the Acceptance of Offer Form contained within the Offer Pack to acknowledge that they have read and understood the requirements of a mature learning environment and the responsibilities that they and their son/daughter/ward are entering into. They are also required to complete the Consent Form, indicating that they understand the UKVI requirements for travel and living arrangements for students under the age of 18. UKVI Tier 4 sponsor guidance states that students between the ages of 16 and 18 years who apply to study in the UK, must provide parental consent.

Applicants and parents/legal guardians not resident in the UK or Europe, will be made aware that it is necessary for them to appoint a UK Guardian until the student turns 18 years of age. Colleges will advise parents/legal guardians to approach the Association of Educational Guardians for International Students (AEGIS) for advice on the appointment of a Guardian or to assist more generally in the process of determining a suitable UK based Guardian. Whilst liability for the appointment of a UK Guardian remains that of the student's parent/legal guardian, the College Director/Principal reserves the right not to recognise an appointed UK Guardian if they deem them not to be suitable, and to require an alternative UK Guardian to be appointed. The individual will typically be expected to:

- Be over 25 years old
- Not be a current student at the College
- Be resident in the UK

UK Guardians should be aware of the importance of their role and should therefore be mature, and able to respond to any issue that may arise during the student's studies.

5.2 Procedures for recruitment of students under 18 years of age.

5.2.1 The Admission Recruitment Centre (ARC) is responsible for ensuring that all applicants under the age of 18 and their parent/s, carer/s or legal guardian/s are provided with information relating to the expectations and responsibilities of all parties involved in their enrolment. The candidate's Application Form will include his/her date of birth which must be checked in all instances prior to an Offer of Admission being made. An Offer of Admission may be made to a student under 18 with the provision that the Offer cannot be confirmed or approved as fully accepted by the Admission Office until such time as the parent/s or legal guardian/s have completed the Acceptance of Offer Form and given parental consent. In doing so they indicate that they agree to all statements and therein conditions of the status of their son/daughter/ward until they turn 18 years of age.

5.2.2 Navitas reserves the right to refuse to admit a vulnerable person to a programme of study, or other Navitas managed activities, if it judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate.

- 5.2.3 Where adaptations are reasonable and proportionate, the Navitas College then puts in place a number of ‘control measures’ in order to safeguard the wellbeing of vulnerable groups, for example the automatic enrolment of U18’s on the Compass programme
- 5.2.4 Except in relation to 5.2.5 below, the Navitas College has a limited power to ask about unspent criminal convictions on admission as a student and where, in the course of exercising that power, a conviction is disclosed which indicates that the individual poses a clear risk to vulnerable groups, the Navitas College has the right to deny admission as a student.
- 5.2.5 As a condition of admission to certain programmes of study, where they will come into close contact with vulnerable groups (typically in health and social care), students are required to undergo an enhanced DBS disclosure will be required prior to the commencement of placement activity. The Navitas College is obliged to refuse admission if the DBS disclosure, on a reasonable assessment, would disqualify the applicant from entering placement or practising as the relevant health/social care professional.
- 5.2.6 The Navitas College does not consider it practicable to take steps other than those described in paragraphs 5.2.1 and 5.2.3 above, to vet the backgrounds of students who, during the course of learning and teaching activities and administrative activities, come into contact with other students who are vulnerable. The Navitas College takes a risk management approach to organising curriculum and service delivery; Colleges carry out a risk assessment and make reasonable adaptations to the delivery of curriculum and/or services. The Navitas College Admissions Policy is available on the College website.

5.3 Accommodation and Contracts

Navitas UPE aims to help support all new students to source accommodation if requested. In some cases, this accommodation will be available on the Partner University Campus. It is ultimately the responsibility of each student (including students U18, their parent or guardian) to assess whether the accommodation on offer is suitable for their needs and whether the terms of occupancy are reasonable. The legal guardian of a student U18 will normally be asked to guarantee the payment of rent or other accommodation fees.

Any person under the age of 18 is unable to enter a legal contract. If a student U18 needs to enter a contract with, for example, an accommodation provider, a parent or guardian is required to guarantee the student’s obligation under that contract. A failure to pay any sums due under a contract may result in demand being made by the contractor on the parent of guardian. Any continuing failure to pay may result in studies being interrupted.

U18 year olds are actively encouraged to participate in clubs and societies organised by the University’s Student Union, however, they are unable to hold Office until they reach the age of 18, as they will be unable before then to discharge an office-holder’s legal responsibilities.

6. Recruitment and employment of staff

a) Declaration of offences

- 6.1 It is illegal for an organisation to knowingly allow a person barred by the DBS to work in regulated activity. Navitas UPE will therefore:
- i) Require all applicants for employment at Navitas UPE to declare any criminal convictions on application forms for employment.
 - ii) Require persons appointed to regulated or controlled posts (including contractors or sub-contractors) to undertake relevant DBS checks.
 - All College-based staff are required to undergo a basic DBS check, with teachers undergoing enhanced checks on the basis that we expect the individuals to be frequently teaching individuals under the age of 18. Where a college is confident that an individual will not teach under 18s (such as where that college does not accept under 18s), only a basic check is carried out. Where a college believes that another member of staff will frequently be working with students under the age of 18,

an enhanced check should also be carried out.

- Where a college is not sure what check to carry out for a particular staff member, this is checked online at <https://www.gov.uk/find-out-dbs-check> and verified with the Navitas Compliance Team.
 - Staff located primarily in administrative premises and not within a college are not typically required to undergo a DBS check, unless a specific role is identified by the recruiting manager as being likely to come in to contact with minors or vulnerable young people/adults.
 - Where teaching has commenced and a DBS outcome has not been received, that teacher may commence teaching, however any one-to-one sessions, or sessions primarily consisting of vulnerable adults or minors, must be under the supervision of another DBS staff member.
 - DBS checks will be considered valid for a period of three years from the date of the DBS outcome.
 - Where an individual holds a personal basic DBS, and the college is able to verify this via the online verification service, and the individual does not require an enhanced check, the college will not carry out a further DBS check.
- iii) If the person appointed is from overseas or has lived overseas for a significant period of time then where required, checks will be sought from the countries concerned. If such checks are not available from the countries concerned, then the person appointed will be required to make a declaration concerning their previous life history.
- iv) Exercise its legal right to require existing employees occupying regulated posts or undertaking regulated work to reveal their full criminal history, including any spent convictions and/or undertake standard or enhanced DBS checks. Navitas UPE may exercise this right as an annual requirement for certain roles.

6.2 Navitas UPE recognises the need to take a proportionate approach to personal and DBS disclosures and will treat all such information in the strictest confidence. Navitas UPE will not discriminate unfairly on the basis of such information.

b) Consideration of offences

6.3 Interview panels will ensure that a fair and measured discussion of any declared offences takes place either at the interview or is subsequently arranged. Guidance on the conduct of this discussion should be sought from the HR. Guidance should also be sought from the HR prior to any offer of employment being made.

6.4 If a subsequent DBS check shows a conviction or caution or contains other information in relation to a potential or existing employee then the CDP, HR with responsibility for the area in which that individual intends to or already works, will form a view on whether this is sufficiently serious to constitute an impediment to their employment by Navitas UPE and should be referred for further consideration under the appropriate Navitas UPE policy. In forming this view, they will take account of factors such as the nature of the conviction or information, time elapsed, and whether this indicates a pattern of behaviour that may place children or vulnerable adults at risk. A confidential written record of this decision will be retained. Guidelines for informing this decision are at Annex B.

c) Reporting to the DBS

6.5 If Navitas UPE dismisses or removes someone from regulated activity (or would have done had they not already left its employment) because they have abused or harmed children or vulnerable adults then it has a legal responsibility to report the person concerned to the DBS. This responsibility will normally be undertaken by the CDP in consultation with the HR

7 Responsibilities of staff

a) Statement of good practice

7.1 Navitas UPE has a Statement of good practice for those who come into contact with children and vulnerable adults as part of their work or studies with Navitas UPE. This Statement is at Annex C and sets out examples of recommended behaviour

towards children and vulnerable adults. All staff are expected to be guided by this Statement.

a) Higher Levels of Responsibility

- 7.2 All students U18 and vulnerable adults are captured under the College Compass programme which provides additional oversight of the student's welfare and academic progress.
- 7.3 Each College will hold a record of all students' emergency contact details for parents and legal guardians for U18 and vulnerable adults.
- 7.4 Each College will ensure that relevant staff, students and other personnel will receive appropriate training in working with those Under 18 and vulnerable adults.
- 7.5 Each College will seek to cultivate an environment that encourages students to approach staff if they have any concerns.

b) Declaration of investigations, cautions and criminal convictions

- 7.6 All staff are required to notify the HR if they are the subject of an investigation by the police or other safeguarding agency into an allegation of abuse of a child or vulnerable adult. Disciplinary action may be taken against staff failing to disclose this information.
- 7.7 All staff are required to notify the HR if they receive a police caution or conviction for a criminal offence. Disciplinary action may be taken against staff failing to disclose this information.

c) Risk assessments

- 7.8 Members of staff with responsibility for activities at Navitas UPE or run by Navitas UPE which involve children or vulnerable adults must ensure that they conduct a risk assessment of the activities involved and take appropriate steps to protect the welfare of the children or vulnerable adults involved. Guidance on producing risk assessments is available from the Navitas UPE's WHS.
- 7.9 Members of staff with responsibility for activities at Navitas UPE or run by Navitas UPE which involve children or vulnerable adults must confirm with the CDP that the College has appropriate insurances in place to indemnify the proposed activity.

d) Sexual relationships

- 7.10 It is a criminal offence for any person in a position of trust to engage in sexual activity with someone who is subject to this trust and is under the age of 18 years. Navitas UPE will also consider this to be a disciplinary issue.

8 Recruitment

a) Recruitment, studying and employment of students

- 8.1 Navitas UPE will require DBS checks to be undertaken for the following groups of students:
 - a) All those offered places on professional programmes requiring placements in regulated positions (e.g., teaching, nursing and social work).
 - b) All those undertaking paid or voluntary work on behalf of Navitas UPE in a regulated setting.
 - c) Students undertaking research which requires unsupervised access to children or vulnerable adults.

- 8.2 Where such students are from overseas or have lived overseas for a significant period of time, checks will be sought from the countries concerned. Students from countries where no such checks are available will be required to make a declaration concerning their previous life history.
- 8.3 If a DBS check indicates that an individual is barred from working with children or vulnerable adults then they will not be offered a place on any course requiring placement in a regulated position, allowed to work as a volunteer in such a position, or to undertake research involving children or vulnerable adults. They may be counselled to seek an alternative course if this is appropriate.
- 8.4 If a DBS check indicates that a student is barred from working with children or vulnerable adults, and that student is already engaged in a programme of study leading to regulated employment, the student's registration on the course will be terminated. They may be counselled to seek an alternative course if this is appropriate.

b) College Safeguarding Panels

- 8.5 Where a DBS check indicates, or Navitas UPE becomes aware of other evidence of convictions or other information that indicates that children or vulnerable adults might be placed at risk, the College DSL will inform the Academic Registry, which in turn will establish a Panel, which may include representatives of the appropriate profession if required, to consider the student's or applicant's suitability for the course of study, volunteer position, or research. The Panel should normally be convened within three weeks of the evidence becoming available to Navitas UPE and its deliberations will be minuted. Students should normally be informed in writing of the decision of the Panel and of the process for any appeal within five working days of the Panel hearing.
- 8.6 Students should be advised in their invitation to the Panel hearing that they are able to access advice and support from the College.

9 Reporting

a) Reporting suspicions, allegations or actual incidents

- 9.1 The welfare of a child or vulnerable adult must be paramount. Members of staff have a duty to report suspicions, allegations or actual incidents to the Safeguarding Officer in the first instance, regardless of whether the information has been disclosed in confidence to them or if they remain unsure of their suspicions. Suspicions must not be discussed with anyone else on campus other than the Designated Safeguarding Lead and CDP. Staff who fail to discharge this responsibility may be liable to disciplinary action.
- 9.2 Any suspicions, allegations or actual incidents must be recorded in the prescribed form (Annex D) which will then be handed/sent IMMEDIATELY to the Safeguarding Officer. This form must be completed as soon as possible after receiving information that causes suspicion or an allegation of the abuse of a child or vulnerable adult. Do not delay by attempting to obtain information to complete all the details. If the concern arises out of normal Office hours contact should be made with the local Social Services emergency duty team. Advice can also be sought from the NSPCC Help Line on 0800 800500 or from the Police Child Protection Team on 0116 222222. It is recognised that staff may need support after receiving a disclosure and will be offered appropriate counselling.
- 9.3 The College Safeguarding team (CDP, Designated Safeguarding Lead and Safeguarding Officer) will collate details of the allegations or suspicion and refer the matter to the appropriate statutory authority. Staff must not attempt to deal with a suspicion, allegation, or actual incident themselves but must report it through the channels outlined above. All suspicions and allegations will be taken seriously and will be responded to swiftly and appropriately.
- 9.4 As far as possible, the confidentiality of all individuals involved in any allegation, investigation or resulting disciplinary proceedings will be respected by Navitas UPE. However, there may be circumstances in which it is necessary for Navitas UPE to share information with parties such as social services, the police, and the parents, guardians or carers of the child

or vulnerable adult concerned. Information may also need to be disclosed if there is a public interest imperative. Navitas UPE cannot therefore guarantee that the confidentiality of any disclosures can be maintained in all circumstances.

b) Reporting concerns about staff

- 9.5 In the event of any suspicion, allegation or apparent abuse committed by a member of Navitas UPE's staff, the matter should be reported to the College DSL in the first instance and/or SO, and a member of HR. Where the situation involves a member of staff from the partner university, the University Key Contact should be informed along with HR.
- 9.6 If it is not possible to contact the abovementioned, it must be reported to another senior member of College staff.
- 9.7 On being notified of any suspicion, allegation or apparent abuse by DSL/SO involving Navitas UPE staff, the CDP shall:
- a) Take such steps as she or he considers necessary to ensure the safety of the child or vulnerable adult in question and any other child or vulnerable adult who might be at risk.
 - b) Liaise with the person who reported the original concern and ensure that a report of the incident(s) is completed.
 - c) Consult with other Navitas UPE staff members if deemed appropriate or advice is required.
 - d) Report the matter to the local social services.
- 9.8 If the CDP is the subject of the suspicion, allegation or the claim of apparent abuse then this must be reported to the LSO directly.
- 9.9 Any notification of suspicion, allegation or evidence of abuse or harm may result in the LSO or their nominee taking the decision to suspend the member of staff concerned whilst investigations proceed. Suspension in this context is not a disciplinary measure and implies no assumption of guilt.
- 9.10 Navitas UPE may refer a member of staff to the relevant professional body if there are concerns over their suitability to practise and/or remain on the professional register or equivalent. The CDP will normally make this referral on behalf of Navitas UPE.

c) Reporting concerns from placements, mentoring schemes, projects or external visits

- 9.11 Staff and students who are undertaking activities at the premises of another organisation should familiarise themselves with the host organisation's safeguarding policies and procedures and the name and contact details of the organisation's safeguarding officer.
- 9.12 Staff with concerns about a child or a vulnerable adult with whom they come into contact in a placement setting or in the course of external visits should follow the procedure in place at the school, hospital or other institution concerned. If, for whatever reasons, the member of staff feels that this is inappropriate then they must refer their concerns to the CDP who will contact the appropriate agency.
- 9.13 Students with concerns about a child or a vulnerable adult with whom they come into contact in a placement, through a mentoring scheme, a project setting or in the course of external visits should follow the procedure in place at the school, hospital or other institution concerned. If, for whatever reasons, the student feels that this is inappropriate or they lack the confidence to raise their concerns then they should refer their concern to the member of Navitas UPE staff who is supervising their placement, mentorship scheme or project. This member of staff should then follow the procedure set out in paragraph 8.11.

d) Reporting concerns about students

- 9.14 If a student engaged in activities with another organisation is alleged to have abused a child or vulnerable adult, the

allegation will be investigated using the procedures of the College or University under whose auspices the abuse is alleged to have happened. The member of staff supervising the activity must inform the CDP of the details of the incident. The CDP, on the basis of evidence, may decide to suspend the student for the period of the investigation. Suspension in this context is not a disciplinary measure and implies no assumption of guilt. Depending upon the outcome of the investigation, the student may be liable for further suspension and disciplinary action.

9.15 The CDP or nominee will notify social services if there is an unexplained absence of more than two (2) days of an enrolled student under the age of 18 years who is on the Child Protection Register.

e) Reporting other concerns

9.16 There may be instances when a member of staff receives information in the course of their normal duties about allegations of abuse towards a child or vulnerable adult that are unconnected with the activities of Navitas UPE or the use of its premises. In such instances, staff must exercise a duty of care and should either encourage the informant to report the matter to the appropriate agencies or, if they remain concerned, make a report themselves. If, for whatever reasons, a member of staff in receipt of an allegation feels that it is inappropriate for them to make the report then they must refer their concerns to the CDP who will contact the appropriate agency.

f) Whistleblowing

9.17 Whistleblowing is an important aspect of a safeguarded Institution. Any individual has the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, students or other persons which may be harmful to those in their care and will receive appropriate support when doing so. In accordance with the Public Interest Disclosure Act 1988, Navitas UPE will support and protect those individuals, who, in good faith and without malicious intent report suspicions of abuse or concerns. Staff are able to access free confidential advice about whistleblowing at www.pcaew.org.uk

g) Reporting/Record-Keeping

9.18 All safeguarding correspondence and communication in relation to students will be recorded on the Navigate SMS. In the case of permanent staff all record keeping will be maintained on Cascade-Go, and in hard copy files for academic teaching staff.

10. Responsibilities of parents, guardians and carers

10.1 The Navitas UPE cannot take responsibility for ensuring the wellbeing of children or vulnerable adults who are on its premises without its knowledge and consent. Parents, guardians or carers who bring children or vulnerable adults onto Navitas UPE premises must take responsibility for their safety and wellbeing and ensure that they do not place themselves at risk, disturb others or damage property.

10.2 Unless they are students of the Navitas UPE or are attending the Navitas UPE as part of an authorised visit or activity, children and vulnerable adults are not allowed to enter learning environments, laboratories, workshops or other premises which present hazards or contain valuable or fragile equipment.

10.3 In accordance with legislation, it is not possible to offer confidentiality to a person under 18 years. As such any disclosures must normally be disclosed to a student or legal guardian apart from child protection issues which will be reported to the appropriate UK authorities.

11. Accident Reporting involving children or vulnerable adults

11.1 Any accident on Navitas UPE premises involving a child or vulnerable adult must be reported to the Navitas UPE's

Health and Safety Team immediately and formally recorded on the accident reporting system as soon as possible.

12. Communication of the Policy

12.1 All staff must be aware of this Policy and must abide by its requirements. It will be published on the Navitas UPE's website in the 'Document Warehouse' to ensure that it is available to all those within the Navitas UPE community who have a responsibility for the wellbeing of children and vulnerable adults.

13. Key contacts

Lead staff member for safeguarding children and vulnerable adults (CDP): 023 9284 3195 Navitas UPE Security (to

contact the Navitas UPE's duty manager outside normal working hours):

NSPCC Child Protection Helpline: 0808 8005000

14. Further information and guidance

13.1 Further information, guidance and interpretation of this Policy should be sought from the CDP

13.2 The Disclosure and Barring Service maintains a guidance note of 'relevant offences' that are applicable to the safeguarding of children and vulnerable adults. This can be found at <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>.

15. Implementation date

This Policy is effective from 12 February 2020.

<ends>

Annex A

Potential indicators of harm, abuse or neglect

Harm, abuse or neglect can take many forms and can include, but not be limited to:

Physical abuse: Physical abuse is deliberately causing physical harm to another person. This might involve punching, kicking, biting, burning, scalding, shaking, throwing or beating with objects or implements. It can include giving a child or vulnerable adult alcohol or illegal drugs.

Emotional abuse: Emotional abuse is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child or vulnerable adult's emotional development. It may feature inappropriate expectations being imposed on a child or vulnerable adult, over-protection and limitation of exploration and learning, or preventing the child or vulnerable adult from taking part in normal social interaction.

Sexual abuse: Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. This may involve physical contact or it may involve non-contact activities such as involving children or vulnerable adults in watching sexual activities, producing or looking at sexual images, encouraging children to engage in sexual acts or behaviour, or grooming a child or vulnerable adult in preparation for abuse (including via the internet).

Neglect or acts of omission: Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs in a way that is likely to result in serious impairment of their health, development or wellbeing. It can include failure to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger. It also includes failure to ensure access to education or to look after a child or vulnerable adult whilst under the influence of alcohol or drugs.

Online abuse: Online abuse is any form of abuse that happens via the internet, whether through social networks, online games or mobile telephones. It may involve cyberbullying, grooming in preparation for abuse, sexual abuse, sexual exploitation or emotional abuse. In such cases, the abuser may be known to the child or vulnerable adult, they may not be known, or they may disguise their real identity.

Children and vulnerable adults can be subject to one or more forms of abuse at the same time. They may display physical symptoms of abuse or neglect in the form of injuries or untreated medical issues; they may exhibit behaviour or knowledge that is inappropriate or unexpected for their age or circumstances; they may appear to be uncomfortable in the presence of certain people or being left alone with them; they may also exhibit aggressive or anti-social behaviour or display symptoms of depression or anxiety.

Annex B

Guidelines on considering criminal records and related information

The Navitas UPE must assess criminal records history within the relevant legal framework and in accordance with the principles of applying public law.

Any decision the Navitas UPE makes on the impact of previous offences committed by an individual should be proportionate, fair and reasonable, within its powers, and based upon considerations that are strictly relevant.

The Navitas UPE will consider a number of factors in assessing the risk presented by any individual to children or vulnerable adults. These include:

- Whether the offence poses a cause for concern and is relevant to the work or activity to be undertaken.
- Whether the offence was an isolated incident or whether it is indicative of a pattern of behaviour that may place others at risk.
- The time that has elapsed since the offence occurred.
- The age of the individual at the time of the offence.
- Whether subsequent amendments to the law mean that the offence is no longer illegal.
- Whether there were particular mitigating circumstances at the time that led to the offence being committed.
- Evidence of remorse, positive change and rehabilitation since the offence was committed.

It is also a requirement to gain references and to try to make all reasonable efforts to obtain information about any unexplained gaps in an individual's life history that may give rise to concern.

Annex C

Statement of best practice

Navitas UPE expects all its staff and students to act in an exemplary manner towards children and vulnerable adults and to ensure that their behaviour does not lead to concerns about their integrity and moral standing or to allegations of harm or abuse.

This Statement is not intended to present an exhaustive list but sets out general expectations of behaviour in terms of what Navitas UPE regards as appropriate behaviour.

Navitas UPE staff and students should at all times:

- i) Treat children and vulnerable adults fairly, equally and respectfully and should not show favouritism or disfavour.
- ii) Be sensitive to the child or vulnerable adult's appearance, race, culture, religious belief, sexuality, gender or disability.
- iii) Act as a good role model and challenge any unacceptable behaviour from others within the Navitas UPE community towards children or vulnerable adults.
- iv) Report allegations or suspicions of harm or abuse of children or vulnerable adults in line with this Policy.
- v) Work, where possible, in an open environment with children and vulnerable adults so that others can clearly observe and hear you.
- vi) Be aware that physical contact and speaking, acting or jesting in certain ways with a child or vulnerable adult may be misinterpreted.
- vii) Avoid physical contact with a child or vulnerable adult unless it is reasonably necessary for health and safety or their wellbeing.
- viii) Respect the right to privacy of a child or vulnerable adult and do not enter any private room occupied by of a child or vulnerable adult alone unless necessitated by an emergency.
- ix) Avoid unaccompanied journeys in a vehicle with a child or vulnerable adult unless necessitated by an emergency.

Responding to allegations or suspicions

If you receive an allegation of harm or abuse or suspect that this is occurring, then:

DO	DO NOT
Stay calm and remain objective	Do not panic or over-react
Listen, hear and take seriously	Do not probe for more information. Inappropriate questioning may influence how the allegation is received or considered by others at a later date
Give time to allow the child or vulnerable adult to say what they want to say	Do not make assumptions. Do not paraphrase or offer explanations or justifications for actions
Reassure and explain that they have done the right thing in telling you about the incident	Do not promise that complete confidentiality can be maintained
Act immediately in accordance with the procedure in this Policy by informing the College SO	Do not try to deal with the allegation by yourself
Make a written record of what was said to you as soon and as accurately as possible using the form outlined below	Do not express your own opinions or conclusions in the report. Do not make a child or vulnerable adult repeat themselves unnecessarily
Report the incident in accordance with the procedures outlined in this Policy	Do not fail to report the incident or delay reporting the incident
Maintain confidentiality about the incident and the people involved	Do not divulge information to people with no role in dealing with the incident

Annex D

Referral Form for Suspicions or Allegations from a member of a vulnerable group including children and young people

Details of person making report

Name:
Position:
Contact telephone number:

Details of Child/Young Person/ Adult

Name:
Date of Birth:
Address:
Contact telephone number:
Names and address of parents/guardian/carers:

Details of person about whom there is concern

Name:
Position:
Date of Birth:
Address:
Relationship to child/young person/ adult:

If you are reporting this alleged incident on behalf of someone else, please provide details of that person:

Name:
Position:
Address:
Contact telephone number:

Date this person advised you of alleged incident:

Record here the information you were given from this person about the alleged incident:

Details of the alleged incident

Date of alleged incident:

Time:

Place:

Names and addresses of witnesses:

Describe in detail what happened (Please use additional paper if required):

Describe in detail visible injuries/bruises and concerning behaviour of the child/young person/ adult, if any (use diagrams if this helps you to describe) (Please use additional paper if required):

Was the child/young person/ adult asked what happened: YES/NO

If yes, record exactly what they said in their own words and any questions asked if the situation needed clarifying (Please use additional paper if required):

Details of action taken

Detail what action, if any, has been taken following receipt of this information:

ONLY AFTER SEEKING ADVICE FROM THE POLICE/SOCIAL WORK DEPARTMENT, were the child/young person/ adult's parent's/guardian/carers contacted?

Details of external agencies contacted

Police	<p>Police station contacted:</p> <p>Name and contact number:</p> <p>Advice received:</p>
Social Work Department	<p>Social Work Dept:</p> <p>Name and contact number:</p> <p>Advice received:</p>
Other	<p>Name of organisation:</p> <p>Name and contact number:</p> <p>Advice received:</p>

Other information

Record any other information you have about this matter (it is important that all information is passed on even that which you think is not important or helpful).

Signature: _____

Print name: _____

Date: _____

Where a referral has been made to the Police and Social Work Department a copy of this form must be sent to them as soon as possible.