



Safeguarding Policy (including Prevent)

Version number	Status (draft/final)	Owning Directorate / Faculty		
2.1	Final	Academic Registry		
Summary of any amendments: Minor changes to version 2, updated with procedural information including guidance about higher apprenticeships				
Document objectives: This document outlines the approach to safeguarding (including Prevent) at the University of Plymouth, including: <ul style="list-style-type: none">• A definition of safeguarding and associated terms• How the university enacts its obligations in relation to safeguarding and Prevent• The procedure to be followed in the event of a concern arising• Responsibilities of students and staff• Governance arrangements and support available including training				
Intended Recipients: Students, staff, volunteers, parents/guardians of students, and visitors				
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2.1	Mar 2022	Alice Ludgate	2	Additional procedure for apprentices
2	Jul 2020	Alice Ludgate	1.3	New policy, merging of Safeguarding Policy and Prevent Policy (both previously standalone)
1.3	Dec 2019	Laura Beahan	1.2	Updating of terminology, support services and role of Local Safeguarding leads
1.2	Jul 2019	Alice Ludgate	1.1	Added reference to 'Prevent', updated names of DSOs (approved by Board of Governors July 2019)
1.1	Feb 2019	Alice Ludgate	NA	Updated names of DSOs and added this covering version control and policy introduction
1.0	Jan 2018	Alice Ludgate	NA	New policy, approved by UEG

Contents

1. Our approach and philosophy	3
2. Safeguarding from risks of harm and abuse.....	4
3. Preventing terrorism, radicalisation and violent extremism.....	4
4. Responsibilities	5
5. Principles of consent and confidentiality.....	6
6. Online safeguarding.....	7
7. Freedom of speech, external speakers and events	7
8. Placements, field trips and fieldwork – information for students	7
9. Record Keeping	8
10. Governance, support and training.....	8
Appendix 1: How to raise concerns	10
Appendix 2: The Procedure for Safeguarding Apprentice Learners.....	12
Appendix 3: Glossary	15
Appendix 4: Safeguarding (including Prevent) Training Plan.....	18
Appendix 5: Signs of harm, abuse and radicalisation	19
Appendix 6: Students under the age of 18	20

What to do if you're worried someone is at risk of radicalisation, harm or abuse

In any emergency situation, call 999. If you're unsure, contact University Security on x3333 (or 01752 588400 externally)

In non-emergency situations, contact a member of staff using the details provided in Appendix 1.

1. Our approach and philosophy

- 1.1. We are committed to supporting and promoting the welfare and wellbeing of students (on all modes of study, including undergraduate, postgraduate, research, apprenticeship and others), staff and visitors throughout our operations and environment, ensuring we can protect our learning community and encourage our people to flourish in their academic endeavours.
- 1.2. Harm or abuse could affect any of our students, staff or visitors (or third parties connected to these groups) and, as a result, we take the approach that “safeguarding is everybody’s business”.
- 1.3. Attached to this policy, Appendix 1 explains how safeguarding concerns must be raised, and Appendix 2 explains the University’s approach to safeguarding apprentice learners.
- 1.4. This policy seeks to safeguard staff and students from risks of harm, abuse and radicalisation, whilst at the same time protecting freedom of speech and embedding the promotion of positive learning and community relations.
- 1.5. Research activity of the university may include children, young people and adults at risk of harm or abuse; the safeguarding of these groups is paramount and the University Research Ethics and Integrity Committee (UREIC) is responsible for developing, implementing and monitoring ethics and integrity policies which enable our safeguarding responsibilities to be upheld
- 1.6. We work in partnership with other organisations including the University of Plymouth Students’ Union, trade unions and safeguarding partnerships.
- 1.7. University subsidiary companies have separate policies.
- 1.8. This policy is developed with due regard to the following:
 - The Care Act 2014
 - Safeguarding Vulnerable Groups Act 2006
 - The Equality Act 2010
 - The Counter Terrorism and Security Bill 2015 and the Prevent Duty Guidance for England and Wales 2015
 - Keeping Children Safe in Education 2021
 - Working Together to Safeguard Children 2018
 - The Health and Safety at Work Act 1974
 - The Data Protection Act 2018
 - The Mental Capacity Act 2005
 - The Protection of Freedoms Act 2011

- 1.9. All concerns raised will be treated seriously and proportionately, including reported promptly to the appropriate local authority or Prevent teams, where necessary.
- 1.10. This policy is owned by the Board of Governors. Responsibility for monitoring resides with the University Health, Safety and Wellbeing Committee on behalf of the University Executive Group. Implementation resides with the University Prevent Lead, Designated Safeguarding Officers and the Safeguarding (including Prevent) Working Group.
- 1.11. Partner institutions, including colleges, will have their own safeguarding arrangements. For any student or employee within a partner institution (excluding international, where different legal arrangements will apply), any safeguarding concern should be reported to the Safeguarding Officer in the partner institution. If the employee or student feels this is inappropriate or they do not feel they have had a satisfactory response, they should refer directly to a central DSO for advice.

2. Safeguarding from risks of harm and abuse

- 2.1. We define safeguarding as “the act of protecting people’s health, wellbeing and human rights” and we practice safeguarding by supporting people to live free from harm, abuse, neglect and radicalisation. Appendix 3 includes a full glossary.
- 2.2. We adopt the following definitions:
 - Adult at risk: We define an adult (aged 18 or over) to be at risk if they are, or may be, in need of additional support services as they are, or may be, unable to take care of themselves, or unable to protect themselves from significant harm, abuse or exploitation, including being drawn into terrorism
 - Child: A person under the age of 18

3. Preventing terrorism, radicalisation and violent extremism

- 3.1. The current UK threat level, which indicates the likelihood of a terrorist attack in the UK is **substantial**, meaning an attack is likely. For more information about threat levels, please visit this webpage: <https://www.gov.uk/terrorism-national-emergency>
- 3.2. Our approach towards safeguarding our community against risks of terrorism comprises:
 - We maintain a Safeguarding (including Prevent) Risk Register and an Action Plan. Oversight for this resides with the Safeguarding (including Prevent) Working Group and is owned by the University Prevent Lead
 - The University Prevent Lead is a member of the Plymouth Prevent Partnership and from this group, we remain up to date about local threats and the national counter-terrorism and Prevent context.

- Training is provided to staff (see Appendix 4) and apprentice learners (see Appendix 2)
 - We work in partnership with the Students' Union to promote student awareness of safeguarding (including Prevent)
 - We provide a system for notification of External Speakers (see Section 8)
 - We comply with the other requirements of the Office for Students (OfS) as laid out in the Monitoring Framework (<https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/how-we-monitor/>)
- 3.3. Where anyone has a concern about another person who may be at risk of radicalisation or being drawn into terrorism/violent extremism, this must be immediately notified to the Designated Safeguarding Officers (see Appendix 1). Indicators of concern might include:
- Threats of violence
 - Use of extremist language
 - Expressions of extremist views and sharing of extremist materials, including online
 - Possessing, accessing or requesting extremist materials, unless authorised to do so for academic study or research
 - Indirect disclosure from the individual, friends or family about vulnerability to terrorism or violent extremism
 - Enabling individuals who are not members of the University community to access University grounds or buildings, where they are a known cause for concern in the context of this policy
- 3.4. Concerns will be dealt with in a safe, supportive and confidential manner. The University maintains close links with the local Police Prevent Team and the DfE Regional Prevent Coordinator for advice and support. Outcomes from a concern being raised could include:
- No further action required (in which case a confidential record will be maintained by the Designated Safeguarding Officer team); or,
 - Internal action may be required, such as disciplinary, Study and Wellbeing Review, signposting to support, fitness to practice; or,
 - External referral may be required, e.g. to the Channel programme
- 3.5. The Student Services Sharepoint contains a range of useful links and information:
<https://liveplymouthac.sharepoint.com/sites/u154/Lists/Safeguarding%20%20Prevent/Tiles.aspx?PageView=Shared&InitialTabId=Ribbon.WebPartPage&VisibilityContext=WSSWebPartPage>

4. Responsibilities

University of Plymouth Safeguarding Policy – Version 2.1 – University Executive Group approved March 2022

- 4.1. The University Registrar and Secretary holds oversight of safeguarding. They are supported by a team of Designated Safeguarding Officers (DSOs) and Local Safeguarding Leads.
- 4.2. The responsibilities of the **DSOs** include:
 - Undertaking relevant training in safeguarding and Prevent and ensuring their knowledge is up to date
 - Acting as a point of contact for those who have concerns and need advice, receiving information, recording information about concerns, risk assessing and taking appropriate action
 - Acting upon concerns and make a direct referral
 - Implementation of this policy
- 4.3. The responsibilities of **Local Safeguarding Leads** include:
 - Undertaking relevant training in safeguarding and Prevent and ensuring their knowledge is kept up to date
 - Acting as a point of contact for those who have concerns and need advice, which could include students, apprenticeship reviewing officers, practice educators or other staff
 - Acting upon concerns and make a direct referral if there is immediate risk, and notify the central DSO team as appropriate in the circumstances
 - Supporting and promoting the implementation of this policy and procedure in their local area
- 4.4. **Managers** within the University ensure staff are aware of the University's Safeguarding Policy and are able to refer concerns appropriately. Managers will build approaches within their team(s) that promote safeguarding and wellbeing, reducing the potential for harm or abuse. For example, adhering to the Disclosure and Barring Service Policy when recruiting staff.
- 4.5. **Staff** must take part in training deemed necessary for their role in relation to safeguarding and speak to their manager or Academic Lead in the event they are unclear about any aspect of that training or this policy. Appendix 4 contains the Safeguarding (including Prevent) Training Plan for the University.
Staff must report any safeguarding concerns in accordance with this policy.

5. Principles of consent and confidentiality

- 5.1. It is preferable for the person involved in a safeguarding referral to be engaged with it being made, so we usually seek their consent before onward referral, except where doing so may place them or others at greater risk, such as in the case of radicalisation concerns where consent would **not** be sought.

- 5.2. Prior to any referral, the University will carry out a risk assessment to ensure that the individual's rights to privacy, and the University's obligations under relevant data protection legislation, are considered alongside risks to the welfare of all those involved. In some case, the University will, having completed a risk assessment, make a referral regardless of consent.
- 5.3. Staff can raise a concern anonymously (not revealing the name of the person about whom they are concerned) to seek advice about next steps.
- 5.4. Only those who need to know, from a professional perspective, will be informed or receive written information about allegations, in accordance with legislative requirements.

6. Online safeguarding

- 7.1 There are different risks presented by the internet in relation to safeguarding vulnerable people from harm, abuse and exploitation. Harm and abuse can be very easy to carry out over the internet and can be difficult to track.
- 7.2 We encourage people to talk about their online activity particularly if they have questions about the reliability of sources or are concerned about something they have seen/received.
- 7.3 Anyone with a concern that they or someone else may be at risk of online harm, abuse or exploitation should report this to a Local Safeguarding Lead or DSO.
- 7.4 When working with children online there are additional safeguarding factors that should be considered, see Appendix 7.
- 7.5 All staff are expected to adhere to IT-related policies including Acceptable Use Policy, Student Charter, Student Code of Conduct and Disciplinary Procedure and employee terms and conditions of employment.

7. Freedom of speech, external speakers and events

- 8.1 We are committed to the principle of freedom of expression within the law and nothing in this policy should detract from this commitment.
- 8.2 However in accordance with our External Speakers and Events Policy ([available online](#)), external speakers will be risk assessed to ensure any risks of harm, abuse or radicalisation (i.e. the safeguarding of our community) are identified and mitigated.
- 8.3 Anyone booking an external speaker must complete the Notification of External Speaker, to document the risk assessment:
<https://plymouth.onlinesurveys.ac.uk/notification-of-external-speaker>

8. Placements, field trips and fieldwork – information for students

University of Plymouth Safeguarding Policy – Version 2.1 – University Executive Group approved March 2022

- 8.1. In a placement or work-based learning environment, such as a professional or clinical setting, you are encouraged to find out the name of the local Safeguarding Officer.
- 8.2. In the event of you having a concern about safeguarding in a placement or work-based learning environment you should report this to the Safeguarding Officer of the provider or employer, (if this role exists) or to the manager/supervisor of the placement (if there is no officer/you're unsure).
- 8.3. If your concern relates to a risk of vulnerability to radicalisation, you should contact the Safeguarding Officer of your placement or if there is not one, complete the safeguarding referral form within the University.
- 8.4. If you report a concern whilst on placement you must also report this to your supervisor, regardless of the response from the placement provider, so that we can support you.

9. Record Keeping

- 9.1. The central DSO team securely store written records of any safeguarding concerns in accordance with the Records Retention Schedule and Privacy Notices.
- 9.2. A separate record exists for apprentice learners, owned by the Designated Safeguarding Officers and the Local Safeguarding Lead within the Central Apprenticeship Hub
- 9.3. Such records are held centrally and securely within Student Services, separate from an employee or student's personal records.
- 9.4. Any referral to the Local Authority or Police will include full details of any information the university is aware of/has had reported in relation to the concern(s).

10. Governance, support and training

- 10.1. The University Health, Safety and Wellbeing Committee is responsible for this policy and the following activities:
 - Policy review including updating to reflect legislative, institutional and other changes;
 - Making recommendations about safeguarding and Prevent training
 - Monitoring this policy's implementation
 - Receiving and discussing serious case reviews to identify lessons/learning points and improvements
 - Receipt and review of an annual report relating to safeguarding and Prevent
- 10.2. All staff, students and volunteers (including Student Ambassadors) whose roles and responsibilities include contact with children and adults at risk and/or who are key to

the delivery of the Prevent Duty, will receive training and guidance appropriate to their role (see Appendix 4)

- 10.3. Anybody who wishes to receive further training or who is unsure about any part of this policy should contact their manager.
- 10.4. Given the nature and sensitivity of safeguarding, it is impossible to predict the support that may be required for someone who has raised a concern; the University therefore offers a range of support in order to best meet the needs of staff and students. This includes:
 - Staff and students can access free online support with Togetherall for confidential access to a **24/7 online community and professional support**. To join, simply go to www.togetherall.com and sign up under 'organisation' with your university e-mail address.
 - The **Student Wellbeing Service** is open Monday to Friday. You can visit the Student Hub in the Library or make contact remotely: 01752 587676 or studentservices@plymouth.ac.uk
 - Our **Pastoral and Spiritual Support Team** are available at 1 Kirkby Terrace, on email at spiritualsupport@plymouth.ac.uk or you can follow the team on Facebook [@Plymouthunichaplaincy](#)
 - **Human Resources** provides a range of support for all employees including an Employee Assistance Programme:
<https://liveplymouthac.sharepoint.com/sites/u114/SitePages/Site%20Home.aspx>

Appendix 1: How to raise concerns

You have a concern that someone is experiencing, or at risk of, radicalisation, harm or abuse*

Your concern is about an **apprentice**: Contact the Local Safeguarding Lead within the Central Apprenticeship Hub using the [online referral form for Apprentices](#)

Your concern is about a **student** or someone connected to a student (or you cannot reach the Central Apprenticeship Hub): Contact a Designated Safeguarding Officer using the [online referral form](#)

Your concern is about a member of **staff**: Contact the Designated Safeguarding Officer for staff (healthandsafetyoffice@plymouth.ac.uk)

One of the DSOs or the Local Lead for Apprenticeships will assess and either:

- Provide advice to you
- Make a referral to the relevant authority

The information about your concern will be recorded securely, and you will be emailed to confirm receipt of your concern, including advising you of the action taken (where appropriate)

*If you are a student of a partner institution, please contact your partner institution's safeguarding lead

For advice, you can contact your School, Faculty or Directorate Local Safeguarding Lead.

The names of all Local Safeguarding Leads are available online:

https://liveplymouthac.sharepoint.com/sites/u154/Lists/Safeguarding%20%20Prevent/Tiles.aspx?PageView=Shared&InitialTabId=Ribbon.WebPartPage&VisibilityContext=WS_SWebPartPage

Will my identity be shared?

- We recognise that you may be worried about the people involved knowing that you raised a concern to a DSO or local lead

- We are required to share your name with the Local Authority or Police teams if a referral is made
- If possible, your identity will be kept confidential, aside from sharing with the relevant services
- You will be supported by the university particularly if you must take part in any further investigation, which may happen if the matter proceeds to a criminal investigation

We hope that through this policy, the support of the university is clearly emphasised and our interest is to protect the wellbeing, welfare and safety of all those involved in our activities – whether as someone making a referral or as the person who we are concerned about.

Appendix 2: The Procedure for Safeguarding Apprentice Learners

The University's commitment to ensuring the safety of our students is extended to those who have chosen to study at the University as part of an apprenticeship programme. We endeavour to provide the highest levels of apprentice safety and wellbeing.

We operate with due regard to relevant legislation and statutory guidance as outlined in Section 1.10 of this policy. Please see Section 1.11 of the policy for guidance about partner institutions who may deliver University of Plymouth programmes. Members of staff can access a dedicated portal for higher apprentices here:

<https://dle.plymouth.ac.uk/course/view.php?id=45924>

Types of safeguarding concern

Apprentice learners are primarily supported via the University's Central Apprenticeship Hub, where we have a Local Safeguarding Lead who can provide advice about any safeguarding concerns in relation to our apprentice learners. Apprentices, Employers and other staff are welcome to contact the Central Apprenticeship Hub for advice. Examples of concerns you may wish to discuss include:

- Bullying (including online and prejudice-based bullying)
- Child criminal exploitation including county lines
- Child sexual exploitation and trafficking
- Domestic abuse
- Emotional abuse
- Fabricated or induced illness
- Female genital mutilation
- Forced marriage
- Gang activity and serious violence
- Gender-based violence/violence against women and girls
- Homelessness
- Intimate partner abuse or teenage relationship abuse
- Neglect or maltreatment
- Online bullying, technology-mediated abuse, online grooming or accessing and/or generating inappropriate content
- Peer-to-peer abuse or harm
- Physical abuse
- Racist, disability and homophobic or transphobic abuse
- Radicalisation/extremist behaviour
- Sexual abuse
- Sexual harassment, online sexual abuse and sexual violence between learners
- So-called honour-based violence

- Substance misuse
- Upskirting
- Violence

Raising safeguarding concerns with the Central Apprenticeship Hub Local Lead

See Appendix 1.

As part of our safeguarding responsibilities, the University will:

- Monitor the attendance of our apprentices and be alert to the signs that there could be a welfare concern, such as:
 - Absence
 - Changes in appearance, behaviour or character
 - Changes in emotional health
 - Excessive alcohol consumption
 - Physical injuries
 - Poor living conditions
 - Self-harm
 - Use of drugs
 - Withdrawing from certain activities
- Ensure apprentices have an awareness of safeguarding and prevent and how to access support services (<https://www.plymouth.ac.uk/student-life/services>)
 - As part of on-boarding, apprentices are required to undertake a Prevent and British Values workshop which is revisited throughout their learning journey
 - Safeguarding, Prevent and British Values are embedded into the Tripartite review process and the themes are regularly discussed
- Ensure apprentices are aware of other relevant policies for their support
- Ensure apprentices can respectfully explore ideas around British Values through their programme (British Values are described as democracy, the rule of law, individual liberty and mutual respect, and tolerance for those with different faiths and beliefs)
- Help apprentices develop an objective attitude to online information and evaluation of the authenticity of online information
- Provide training for apprentices so that they can work safely and effectively online, including providing guidance about what is acceptable within the University (see Section 6 of this policy)
- Provide safeguarding (including Prevent) training for all University employees working with apprentices (see Appendix 4)
- Comply with Safer Recruitment Guidance
- Maintain open communication with each employer

Protecting apprentices from risks of radicalisation, terrorism and violent extremism

The University pays due regard to the need to prevent people from being drawn into terrorism (see Section 3 for more information and Appendix 3 for a glossary of relevant terms), recognising that this can be associated with a wide range of ideologies.

Appendix 3: Glossary

- **Abuse** is the intentional or unintentional misuse of the power and control that one person has over another; it does not matter whether the perpetrator intended the abuse to take place or not. There are many types of abuse which can include physical, sexual, psychological, financial or material, neglect, discriminatory, organisational and domestic.
- **Bullying** is threatening, abusive, intimidating, undermining or insulting behaviour that may be an abuse of power, position or knowledge (see the University's Anti-Harassment and Anti-Bullying Policy and Procedure).
- **Child** is a person under the age of 18 (their living arrangement or attendance at University does not change the person's status as a child).
- **Discriminatory abuse** can manifest itself in many ways however it is motivated by unfair and inappropriate attitudes, feelings or behaviour towards an individual due to their race, gender, religion, age, sexuality or disability. It can take include serious, repeated or pervasive discrimination, which leads to significant harm or exclusion from mainstream opportunities or provision of poor standards of service/care.
- **Domestic abuse** includes psychological, physical, sexual, financial, emotional abuse and so-called 'honour'-based violence committed by a family member, carer or intimate/ex-partner, regardless of gender or sexuality. It can be controlling, coercive, threatening behaviour which implies that violence might occur or may have already occurred.
- **Emotional abuse** is persistent emotional ill-treatment such as to cause severe and persistent adverse effects on a child/vulnerable adult's emotional development.
- **Exploitation** is the deliberate maltreatment, manipulation or abuse of power and control over another person; it is taking advantage of another person or situation usually, but not always, for personal gain. Exploitation may include slavery, being controlled, forced or compulsory labour, domestic violence, sexual violence and human trafficking.
- **Female Genital Mutilation (FGM)** is the deliberate mutilation of female genitalia; often the removal, injuring or cutting of the labia and clitoris where there is no medical reason for this to be done. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse.
- **Financial abuse** is the use of a person's property, assets, income, funds or any resources without their informed consent or authorisation; it may include theft, fraud, internet scamming, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Forced marriage** is one in which one or both parties are married without their consent (unlike an arranged marriage where both parties consent to third party assistance in identifying a spouse); no-one can consent to marriage on behalf of someone else.
- **Grooming** is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, exploitation or trafficking.

- **Harm** is the ill-treatment or the impairment of health or development which can be a single act, repeated acts of a similar or different nature, intentional or unintentional, or an act of neglect or failure to act.
- **Harassment** is unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual (see the University's Anti-Harassment and Anti-Bullying Policy and Procedure).
- **Historical abuse** is abuse that took place in the past, which must still be referred using the reporting procedure.
- **Peer abuse** is carried out by children and young people towards one another and must always be taken as seriously as abuse perpetrated by an adult.
- **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and psychological needs, likely to result in the serious impairment of their health or development, such as failing to provide food, medical care, shelter, warmth and clothing.
- **Physical abuse** may include hitting, shaking, throwing, poisoning, burning, drowning, suffocating, or otherwise causing physical harm including by fabricating the symptoms or, or deliberately causing, ill-health to another.
- **Psychological abuse** includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Safeguarding** means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.
- **Self-harm** refers to a wide range of behaviours that someone does to themselves in a deliberate and usually hidden way, resulting in non-fatal injury or in the case of suicide, death.
- **Sexual abuse** is forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening; this may involve physical contact, including penetrative or non-penetrative acts. This may include involving children and vulnerable adults in looking at, or the production of, pornographic material or encouraging children/vulnerable adults to behave in sexually inappropriate ways. It also includes situations where the individual does not have the capacity to consent or has been coerced because the other person is in a position of trust, power or authority.
- **Sexual exploitation** is a form of sexual abuse, where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or vulnerable adult into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. Sexual exploitation may occur even if the activity appears consensual, and it can occur through the use of technology.

- **Spiritual abuse:** Spiritual (or religious) abuse is a form of emotional and psychological abuse. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context which causes harm or injury to people.
- **Technology-assisted harmful sexual behaviour** is when people use the internet or other technology to engage in sexual activity that may be harmful to themselves and others
- **Terrorism** is the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause
- **Trafficking** is when people are illegally transported from one country or area to another, typically for the purposes of forced labour or commercial sexual exploitation.
- **Violent extremism** includes violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activities in the name of an ideology or set of beliefs.
- **Vulnerability** describes a situation when a child or adult is at risk of exploitation, harm or abuse. A person may join the University already vulnerable, or can become vulnerable because of specific circumstances, which may increase the risk of them experiencing harm or abuse.
- **Vulnerable adult** is term previously referred to in the context of safeguarding. Now, the term used is an '**adult at risk of harm or abuse**'. This still refers to a person aged 18 or over who is, or may be, in need of additional care services because of mental or other disability, age, personal circumstances or illness. An individual may be at risk of harm or abuse through being unable to take care of himself or herself, or unable to protect him or herself against significant harm or abuse.

Appendix 4: Safeguarding (including Prevent) Training Plan

Level	Target audience	Staff groups	Training	Frequency
1	Staff who have occasional contact with children or adults at risk, who may become aware of possible abuse, neglect or other safeguarding-related concerns including radicalisation. This group identifies staff who are deemed key to the delivery of the Prevent Duty. Staff need to understand: <ul style="list-style-type: none"> ✓ What is abuse? ✓ Signs and indicators of harm, abuse and radicalisation ✓ What to do in response to concerns (how to notice, check and share) 	All core staff (across both professional services and academic) All ALDs involved in the delivery of higher apprenticeships	Safeguarding (including Prevent) eLearning Supplemented by regular updates via the staff bulletin regarding safeguarding	Three-yearly
2	Staff who regularly interact with children or adults at risk, who may be able to identify concerns about abuse, harm or radicalisation. Staff need to understand: <ul style="list-style-type: none"> ✓ How to record information ✓ How to share information ✓ Safeguarding roles and responsibilities 	Local Safeguarding Leads Member of UEG Member of Board of Governors	Safeguarding (including Prevent) eLearning and Safeguarding: Prevent training for University staff (face-to-face training)	Three-yearly
3	Staff who work predominantly with children or adults at risk, who could potentially contribute to assessing, planning, intervening and reviewing the needs of a child or adult at risk. Staff need to understand: <ul style="list-style-type: none"> ✓ How agencies work together to identify, assess and respond to safeguarding concerns ✓ Impact of issues such as domestic abuse, substance misuse and mental health ✓ Working with complex family dynamics ✓ Lessons from serious case reviews ✓ Current policy, research and practice developments ✓ Trauma-informed responses 	Designated Safeguarding Officers	Child Protection Training (via the Plymouth Child Protection Partnership) and Adult Safeguarding Training (via the Adult Safeguarding Partnership) And Safeguarding: Prevent training for University staff (face-to-face training)	Induction training (by completing the two courses listed here) Two-yearly update training (in a relevant safeguarding subject)

Appendix 5: Signs of harm, abuse and radicalisation

This section describes potential signs and indicators of harm, abuse and radicalisation.

How might you become aware of harm or abuse taking place?

- Someone might describe abuse to you
- A friend, family member or someone else may raise a concern with you
- You might notice injuries or physical signs of concern
- You might notice a change in behaviour which concerns you that something might be wrong

The clearest sign of abuse is an actual report or direct statement. If someone confides in you, you have a responsibility to respond to the disclosure regardless of the nature of the relationship you have with the person in question.

Your role is never to decide whether there is enough evidence or if the allegation is supported by evidence. Your only responsibility is to raise the concern, to allow that person to be protected.

Signs of abuse are not always obvious and a person may not tell anybody what is happening to them, nor may they necessarily know that what is happening is abuse.

For more information about spotting the signs, visit <https://www.ltai.info/spotting-the-signs/>

Appendix 6: Students under the age of 18

a) Summary

This document outlines the approach of the University of Plymouth towards prospective and current students who are under the age of 18, both in terms of safeguarding this group and ensuring an enjoyable university experience, providing reassurance to the student themselves as well as their family and support network, be that locally or internationally.

b) Introduction

Most students will be aged 18 or over when they commence their studies, or they will turn 18 very soon after. This guidance outlines our approach to all applicants and students (including those holding Tier 4/Student visas and other international students) under the age of 18 and until their 18th birthday. It also applies to University of Plymouth International College (UPIC) students who study at the University of Plymouth.

c) Admissions

The University welcomes applications from candidates irrespective of age, including those who are under the age of 18. Applications are considered on their merits and we may offer a place to under 18 students if we believe the student has the potential, intellect and academic ability to successfully complete the relevant programme of study and have sufficient personal maturity to benefit from higher education. The only exception is where there are accreditation and legal age requirements which may preclude students under the age of 18, for instance on some health-related programmes.

International Students or those on Tier 4/Student Visas under the age of 18

Under Section 55 of the Borders, Citizenship and Immigration Act 2009, the Home Office must have regard to the need to safeguard children and protect their welfare. All children studying in the UK must have suitable care arrangements in place for their travel, reception on arrival in the UK and living arrangements while here. This applies up to a child's 18th birthday.

If upon the date the Confirmation of Acceptance for Study (CAS) is issued to a Tier 4/Student Visa applicants, or upon the date a place is confirmed as unconditional or unconditional firm for an international student, a student is under the age of 18, this procedure will be followed.

Upon application, the Admissions Team will advise the student of the information they are required to supply (see section 5) and will advise the student that this information is required at either a date prior to the CAS being issued, the date of the CAS being issued or on the date their unconditional offer is made, if they do not require a CAS. This document will be made available to this group of prospective students.

For Tier 4/Student Visa applicants, when all academic conditions are met:

- The student or their agent/representative will be emailed the 'Under 18 Consent letter' which must be completed by the parent or legal guardian and signed and returned to the University
- The student is required to supply contact details

- Upon these requirements being met, and when all other conditions are satisfied, the CAS will be issued as per the usual procedures.

It is a condition of legislation that any 16- or 17-year-old prospective students, applying as a Tier 4 (General) student, must have their parent(s) or legal guardian(s) consent that they can live and travel independently. The University therefore has to ensure this consent has been received, which happens through the 'Under 18 Consent Letter'. This letter must be retained by the University.

The University does not have a license to sponsor students under the Tier 4 (Child) category and so cannot accept international students under the age of 16.

d) Online interactions

The following should be applied:

- Where possible online interactions should take place on a secure platform
- Social media should not be used
- When using video platforms, always ask the student if they would prefer their camera to be off
- Aim to work in an open environment that does not intrude on the student's privacy. Where this is not possible then ensure that the student is in an environment where they feel comfortable

When working with under 18s in partner colleges or schools then the college or school must confirm that they have a safeguarding policy in place and have protocols for online interaction. If in doubt please contact the central safeguarding team for advice safeguarding@plymouth.ac.uk

e) Parents and guardians

Prior to arrival at the university, any student under the age of 18 at their enrolment date must provide us with contact details for their:

- Parent, or
- Other legal guardian if both parents are deceased, overseas or otherwise unavailable.

Such a guardian should:

- Agree with the parents to act on their behalf and to perform the parental tasks and responsibilities delegated by them until the student's 18th birthday;
- Ideally live near Plymouth/in the south west of England; and,
- If necessary, be available to the student and University when required

We require a copy of the guardian's agreement with the parents, as part of any offer made to the student. A guardian is normally a friend of the family or relative living in the UK; the University is unable to appoint, or assist in finding, a suitable guardian. A list of accredited agencies is available from the Association of Educational Guardians for International students (AEGIS) – www.aegisuk.net.

The majority of Tier 4/Student Visa or other international students' parents or legal guardians will reside outside of the UK. In such cases, Tier 4/Student Visa and other international University of Plymouth Safeguarding Policy – Version 2.1 – University Executive Group approved March 2022

students must obtain a UK-based legal guardian. Alternatively, they must provide upon application the contact details of their parent(s) or legal guardian(s) if they are ordinarily resident in the UK. No CAS will be issued without details of the student's guardian being confirmed.

Should a student need to change their guardian, this is acceptable provided there is no gap of time between guardians (there must be a guardian at all times as a condition of that student's enrolment until their 18th birthday; the absence of a named guardian could result in the termination of enrolment).

f) Students' general rights and responsibilities

A university represents an adult environment and treats all students as mature, independent individuals. We will normally deal and correspond with our students than with their parents.

Under the Data Protection Act 2018, students (including those under the age of 18) have the legal right for information about them not to be disclosed without their consent. Accordingly, unless this explicit consent is granted, the University will not normally give information to parents regarding any student's progress, results or personal circumstances. This applies to all students regardless of age.

Students are expected to seek support as they require it, and should do the following:

- Act as adults and behave in an appropriate manner
- Assume responsibility for their studies and lifestyle, including adapting to living away from home
- Engage with their personal tutor to maintain contact and allow the tutor to support them
- Have the right skills to study and live independently with diverse groups of people
- Comply with the laws of the UK, for instance the purchase, selling or use of alcohol or tobacco prior to age 18

Although the University acknowledges that anyone under the age of 18 is legally a child, and may have additional needs for support and welfare, the University will not take on the usual rights, responsibilities and authority that parents have in relation to a child and will not act in 'loco parentis'¹ in relation to students under age 18. The University will not assume responsibility for any student's acts or omissions.

g) Privacy & how we use information about students under 18

We request and store details of parents/legal guardians for under 18 applicants in order to exercise our duty of care (and in the case of Tier 4/Student Visa students this is a requirement of the visa). This information is stored on the relevant information systems (e.g. Salesforce,

¹ This is a legal term derived originally from English common law, it means "in the place of a parent" University of Plymouth Safeguarding Policy – Version 2.1 – University Executive Group approved March 2022

Unit-E) in accordance with legislative requirements including the Data Protection Act 2018 and our local policies/the student contract.

For those students not studying on a Tier 4/Student visa, data around parents/legal guardians will be retained in accordance with the University's Records Retention Schedule.

h) Student support and safeguarding

For any students under the age of 18, we take steps to safeguard their health, safety and welfare.

This will normally include:

- The names of under 18-year-old students will be communicated by Admissions to the relevant Faculty, Student Accommodation and Academic Registry
- Through notification to the Faculty, the personal tutor will be made aware of the name of their under 18 student(s) and will meet with them at regular intervals, agreed by the student and tutor, to discuss his or her studies
- A member of Student Services staff will meet with students under the age of 18 at regular intervals, agreed by the student and member of staff, to discuss his or her wellbeing and living arrangements

All staff must report any suspicious, concerns, allegations or risks of child abuse to a DSO, details of which are provided in the Safeguarding Policy Appendix 1.

Similarly, if a student under the age of 18 discloses harm or abuse to a member of staff, the member of staff must report this to a DSO in the central team. Allegations involving a student on placement or exchange should also be raised in the same way.

i) Accommodation

The University seeks to promote and safeguard the welfare of students who are under 18 whilst living in university-managed accommodation and this guidance applies to students aged under 18 who have a licence, or booking, for university-managed accommodation. The guidance ceases to apply to students once they reach their 18th birthday.

- The university does not assume parental responsibility for any student under the age of 18
- Students and their families or supporters should bear in mind that the university is an adult environment, within which students are expected to behave appropriately including having the necessary skills to study and live independently alongside people from a wide variety of backgrounds
- Places in university-managed accommodation are offered on the understanding that the student will be able to adapt to living away in the residence and to look after themselves in practical matters. We strongly recommend (and will normally facilitate) under 18 year olds book accommodation with the university, in en-suite, single-sex accommodation
- The Accommodation Services team will notify the building provider (UPP) or under 18 year old residents to ensure housekeeping and maintenance follow appropriate processes and that there is awareness of under 18 year olds in any emergency response

- Accommodation Services will provide a 1-1 induction in person or online, along with parents, guardians or supporters if requested, and will ensure under 18 year olds are aware of whom to contact in case of difficulties, including individual training on fire evacuation and other emergency procedures. A member of the team will arrange a termly meeting for as long as students remain under the age of 18, to check on general wellbeing (we expect students to attend this however they are able to decline if they prefer)
- Accommodation Services will promptly inform the student's parent (or other named responsible adult on the licence) if we become aware that the student is in serious rent arrears or is in serious breach of the Tenancy Agreement, invoking the Disciplinary Procedure. In all cases, the team will encourage students to involve their parent or other named responsible adult before such contact is made by the University
- Students live in their accommodation independently and the university does not monitor how students spend their leisure time or cope with student life (including finance, budgeting, medical needs), but students are encouraged to talk to university staff if they are struggling, so that advice and support can be given
- Students entering into a licence agreement are expected to abide by the terms and conditions of the licence and live independently, taking responsibility for their living arrangements. In all cases we expect residents to provide the name and address of a parent or other responsible adult who will be Accommodation Services point of contact
- Any under 18-year-olds choosing to live in privately-managed accommodation do so independently of the university, and the university is not responsible for the policies or practices of such providers, however through the good practice network, the university encourages purpose-built student accommodation (PBSA) providers to adopt a similar approach to under 18 year olds in their residence(s)

j) Placements, field trips and exchanges

As part of a programme of study, students may be required or offered the opportunity to attend field trips, placements, excursions or other off-site study activities. This is a usual part of university life and helps students build life skills, so we encourage every eligible student to take part.

We are not able to make special arrangements for students under the age of 18, in this regard, and unless otherwise specified the parents or guardians of such students are deemed to have consented to the student's participation in such activities on that basis.

If a student attends another institution or organisation they should comply with the local policies and procedures.

k) Disclosure and Barring Service (DBS)

We conduct DBS checks for staff who satisfy the relevant criteria, to ensure suitability for working with under 18 year olds and vulnerable groups. More information is available in the DBS Policy.

l) Emergencies

In an emergency, we may contact the parent or guardian of an under 18 student using the most recent contact details provided to it, the 'next of kin' or 'emergency contact'. This is as articulated in the student contract.

Students, their parents or guardians must keep us informed of any student's special needs or requirements, if applicable, by contacting the student hub, which in turn can enable support to be put into place for the student such as disability, learning support and wellbeing: <https://www.plymouth.ac.uk/student-life/services/student-services>

m) Contracts and holding office

Any person under the age of 18 is unable to enter into a legal contract. If a student under the age of 18 needs to enter into a contract with the university, for instance relating to tuition fees or accommodation, the student's parent or guardian is required to guarantee the student's obligations under that contract.

A failure by a student to pay any sums due under a contract may result in demand being made by the University on the parent or guardian. Any continuing failure to pay the University may result in studies being interrupted.

Under 18 year olds are encouraged to actively participate in clubs and societies organised by the University of Plymouth Students' Union, however they are unable to hold office until they reach age 18, as they will be unable before this age to discharge an office-holder's legal responsibilities.