

# ARDEN UNIVERSITY QUALITY ASSURANCE DOCUMENT

# **QA57 Safeguarding & Prevent Policy Statement**

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## 1. Introduction and principles

Arden University is committed to the safeguarding and promotion of the welfare of all its students and staff. To that end, we seek to ensure that our organisation, its activities, staffing, and procedures are carefully managed through rigorous application of safeguarding principles that reflect our statutory responsibilities and government quidance.

We also aim to ensure that our approach to handling any issues of a safeguarding nature is in accordance with sector best practice.

This policy should be read alongside the overarching safeguarding and safer recruitment policies and processes within Arden University, fully utilising Keeping Children Safe in Education 2025 which has informed this policy.

All staff must read Part One: Safeguarding information for all staff and Annex B as a minimum. Keeping Children Safe in Education 2025, Part One and Annex B outlines abuse and safeguarding issues that we all need to be aware of.

Annex B contains additional information about specific forms of abuse and safeguarding issues. Keeping Children Safe in Education 2025. The Safeguarding of staff, students and apprentices at Arden University is deemed to be the responsibility of all staff at Arden and Safeguarding along with the associated elements of Child Protection and the Prevent agenda are integral to all activities associated with Arden whether on or off site.

Aspects included under the 'umbrella' of Safeguarding and for which Arden has a responsibility in supporting all student and apprentices include:

- Keeping staff, students and apprentices safe within and outside of training and working environments.
- Staff, students and apprentices need to be aware of the safeguarding risks and threats that could cause them harm or injury.

## 2. Scope

This policy sets out Arden University's approach to providing a safe environment in which to work, study and research. Informed by legislation, this document sets out the definitions, responsibilities, and procedures required to ensure the safeguarding of children and vulnerable adults with whom we may have contact.



Our safeguarding policy and procedures seek to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all students:

- have a positive and enjoyable experience of their education at Arden University;
- can study or take part in their studies in an environment where they are safe, listened to, respected, and valued;
- are supported to challenge discrimination and promote the right to equal protection;
- are protected from emotional and other forms of abuse whilst participating in:
  - o lecturer-led or coach-led sessions, where in class or via our virtual learning environment (VLE);
  - o organised online discussion forums on the VLE;
  - o Arden University-led online networking groups (social media);
  - o any extra-curricular activities based at an Arden University...
  - o any apprenticeship workplace activities.
- 2.3. Arden <u>University must comply with a new condition of registration</u> effective from A<u>ugust 1st 2025 regarding Sexual Misconduct and Harassment.</u> As part of that, we have created a <u>single source of information in relation to Sexual Misconduct and Harassment where you can find:</u>
  - Signposting to any updated Arden University policy;
  - the reporting form to report an alleged incident of Sexual Misconduct and/or Harassment;
  - <u>information on the support on offer to students, staff and visitors of Arden University;</u> and
  - <u>new training available to staff</u> and students, to raise awareness of how we are responding to the regulation and introducing new topics on consent and bystander awareness.

To find out more, visit <u>here</u> which will be regularly updated and reviewed by the relevant <u>Arden University teams</u>. Please note, the reporting form found on this page is specifically for reporting cases of Sexual Misconduct and Harassment.

# Our safeguarding policy also seeks to ensure:

- effective management of safeguarding and prevent (including Martyn's law) procedures through support, training, and workplace training;
- prompt response to any concerns raised in Arden University led or workplace activities;
- confidential, detailed and accurate records of all safeguarding and prevent concerns are kept and securely stored;
- ensure that all staff members in unsupervised contact with minors (physical or virtual) are subject to annual DBS checks, and that accurate records of these tests are maintained.



Failure to comply with the safeguarding and prevent policy and procedures will be addressed without delay and may result in dismissal or exclusion from the organisation.

#### 3. Definitions

#### 3.1 A Minor

A minor is defined as anyone who has not yet reached their eighteenth birthday.

### 3.2 A Vulnerable Adult

A vulnerable adult is someone aged eighteen or over who is, or may be, in need of additional support and/or community services due to age, illness or mental or physical disability, or who is, or may be, unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.

### 3.3 A victim

Someone who has been injured, who has suffered or who has been killed following the actions of someone or something else.

### 3.4 A perpetrator

Someone who carries out a harmful or illegal act.

## 3.5 Abuse

Abuse (physical, emotional, sexual or neglect) is a form of maltreatment of a child or vulnerable adult, caused by inflicting harm or by failing to act to prevent harm. See appendix 7 for examples and indicators of abuse, though this is not considered an exhaustive list.

### 3.6 Prevent and Martyn's law

Prevent is the government's national counter-terrorism strategy aimed at stopping people from being drawn into terrorism or extremism. It aims to reduce the risk of radicalisation and to ensure those at risk are given advice and support. Martyn's law places a duty on owners and operators of public buildings; including education establishments, to increase their preparedness for the protection from a terrorist attack.

### 3.7 Extremism

Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

#### 3.8 Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

### 3.9 Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate

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partners or family members regardless of gender or sexuality.

## **3.10 Forced Marriage**

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so.

### 3.11 Child-on-child abuse

any form of physical, sexual and emotional and financial abuse, and coercive control, exercised between children and within children's relationships, both intimate and non-intimate.

### 3.12 Child exploitation

Refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child.

## 3.13 Child criminal exploitation

Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.

## 3.14 Female genital mutilation

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

## **3.15 Serious Violence**

Specific types of crime such as homicide, knife crime, and gun crime and areas of criminality where serious violence or its threat is inherent, such as in gangs and county lines drug dealing.

## 3.16 What is Harassment?

Harassment is unlawful under the Equality Act 2010 and Protection from Harassment Act 1997.

Harassment is any unwanted physical, verbal or non-verbal conduct relating to a protected characteristic that has the **purpose** or **effect** of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

The protected characteristics are:

- age;
- disability;
- gender reassignment;
- marital or civil partner status;
- pregnancy or maternity;
- race;
- colour;



- nationality;
- ethnic or national origin;
- religion or belief; or
- sex or sexual orientation.

Harassment also includes treating someone less favorably because they have submitted or refused to submit to such behaviour in the past.

Behaviour can amount to harassment even when that is not the intention and the victim of harassment need not be the victim of the behaviour. Harassment can be committed when anyone feels intimidated, threatened or experiences a hostile environment.

Examples of harassment may include, but is not limited to:

- jokes and remarks about a different ethnic group, if this creates an offensive environment.
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as part of the LGBTQIA+ community;
- offensive e-mails, text messages or social media content; or
- mocking, mimicking or belittling a person's identity or characteristics.

## 3.17 What is Sexual Misconduct?

Sexual misconduct relates to all unwanted conduct of a sexual nature.

This includes, but is not limited to:

- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
- Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2010)
- Assault (as defined by the Sexual Offences Act 2003)
- Rape (as defined by the Sexual Offences Act 2003)
- Physical unwanted sexual advances (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
- Intimidation, or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
- Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015).

Sexual misconduct can be carried out through any medium, including face to face, over the telephone, in writing or online.

## 4. Safeguarding roles and responsibilities

The following roles ensure that the University will discharge its responsibilities effectively.



A full list of the <u>Safeguarding Leads can be found in appendix 3</u> and on the intranet under 'academic area'.

## Principal Designated Safeguarding Officer (PDSO)

The PDSO holds responsibility for the implementation of the Safeguarding Policy and procedures. Their role will ensure, through delegation that Arden is committed to uphold its duty to safeguard its staff and students. The Head of Student Success has overall responsibility for the strategic and operational implementation of safeguarding policy.

## **Designated Safeguarding Officer**

Designated Safeguarding officers are to be contacted when concerns are deemed urgent, high risk and there is an immediate threat to the individual in question and/or their dependents. Designated Safeguarding Officers are to support with concerns that involve conversing with third party organisations.

### **Designated Safeguarding Lead**

Designated safeguarding leads will provide support to low or medium risk concerns. Designated Safeguarding leads can be contacted if there is uncertainty around reporting concerns, but it is not intended that they will be contacted regarding emergency high risk concerns. If deemed necessary, designated safeguarding leads can re classify the level of risk reported.

## **Prevent Lead**

In the event of any concern relating to Prevent, any student, staff member or other individual should email prevent@arden.ac.uk or contact Steve Clayton, Pro Vice-Chancellor (Effectiveness, Quality & Compliance) via email.

The PVC (EQC) has overall responsibility for compliance with the Prevent Duty, to uphold the implementation of the enchased tier of the Protect Duty (Martyn's law) and for operational coordination of Prevent procedures and for advising and supporting staff or students who raise concerns.

Designated Safeguarding Persons have responsibility for operational coordination of safeguarding procedures and for advising and supporting staff who raise concerns.

### 5. Raising a concern

Safeguarding concerns must be raised when there is either disclosure of harm, exploitation, or abuse or where there is a risk of such. Arden does not expect staff or students to decide whether someone has been harmed or is at risk. However, the University do expect concerns to be raised as per this policy, so that action can be taken. Situations where concerns should be raised but are not limited to:

- A child or vulnerable adult discloses that they have been subject to harm, exploitation, or abuse.
- A student or staff member discloses information about their family member which suggests there is a risk of harm, exploitation, or abuse to a child or vulnerable



adult.

- There is a concern that a child or vulnerable adult is at risk of harm or manipulation.
- Changes have been noticed regarding a child or vulnerable adults' appearance which could suggest harm, exploitation, or abuse.
- A student or staff member who has recently been arrested or convicted of a crime, whereby the nature of which could pose a risk to the individual or others or where the offense involves harm or risk to others, such as assault, harassment or sexual misconduct.

## **5.1 Reporting Harassment or Sexual Misconduct**

Arden University must comply with a new condition of registration effective from August 1st 2025 regarding Sexual Misconduct and Harassment. As part of that, we have created a single source of information in relation to Sexual Misconduct and Harassment including developing a reporting form for any allegations or incidents of Sexual Misconduct and/or Harassment. This reporting form can be found here, and can be completed anonymously or non-anonymously, for yourself or on behalf of another individual.

This reporting form is handled with due sensitivity, confidentiality and reasonably by the relevant staff teams to investigate and/or offer support to anyone who has requested so. The form follows the below process.

The reporting form is explicitly for harassment and sexual misconduct, and can be found here. The form takes an individual, whether staff, student or visitor, through a series of questions to ascertain the details of the alleged incident, including an opportunity to provide evidence or detailed information, and a series of optional questions to understand how best to investigate the report, including information about the individual raising the report. All data is handled appropriately and only relevant staff members who have been sufficiently trained will have access for investigation purposes or support, if requested.

For further details on investigation and support related to the reporting mechanism for Sexual Misconduct and Harassment, please review the Bullying, Harassment & Sexual Misconduct Policy.

## 6. Protocol

Please see **appendix 1** for a visual of the appropriate channel to report a safeguarding concern.



Please see **appendix 2** for links to appropriate safeguarding referral forms.

### **Concerns about students**

For staff members raising concerns about a student, the appropriate Microsoft form can be found under the 'Academic Area' on the intranet, ilearn under 'My Resources' and the Safeguarding page on the Wellbeing Portal. These concerns will be monitored by named safeguarding personal within Student Support.

For students raising concerns about other students, the appropriate Microsoft form can be found under the 'My Resources' section on ilearn and on the Wellbeing Portal under the safeguarding banner. These concerns will be monitored by named safeguarding personnel within Student Support.

#### **Concerns about staff members**

For staff members raising concerns about other staff members, the appropriate Microsoft form can be found under the 'Academic Area' on the intranet on the Safeguarding page of the Wellbeing Portal. These concerns will be monitored by People Services.

For students raising concerns about an Arden staff member, the appropriate Microsoft form can be found on the Wellbeing Portal under the safeguarding banner. These concerns will be monitored by People Services

Reported concerns should set out information relevant to the reason for raising the concern, such as (but are not limited to):

- Name
- STU number
- Location where incident occurred
- Date & time of incident
- What time of harm was caused
- Contact details of relevant individuals
- Any actions that have been taken
- Any involvement with external agencies

**Appendix 5** includes examples which will support awareness-raising in connection with recognising safeguarding concerns.

### Concerns where a child is at risk

Where a child is suffering or is likely to suffer from harm, abuse or exploitation, it is important to refer them to their local authority children's social care department (and the police as appropriate). This will ensure a contextual approach to address such harm.

The following toolkit directs to the relevant local authority children's social care contact number: https://www.gov.uk/report-child-abuse-to-local-council



# 7. Dealing with Concerns about Radicalisation

Arden's safeguarding policy also extends to protecting children and vulnerable adults from involvement in groups who aim to radicalise them.

The Counter Terrorism Act 2015 imposes a duty on 'specified authorities', Higher Education providers fall under this and therefore Arden University understands its duty of care to prevent people being drawn into terrorism. The University will:

- Train staff on how to identify extremism and radicalisation
- Be vigilant about the risks of radicalisation
- Have in place policy and procedures to prevent extremism
- Train staff on the implementation plans for the Protect Duty (Martyn's law)

Arden University believes that dealing with potential signs of radicalisation should be dealt with by utilising a safeguarding approach. This approach enables relevant services within and outside the University to identify an individual's needs and vulnerabilities. If a member of staff is concerned that an individual may be becoming radicalised s/he can seek guidance from ACT <a href="https://actearly.uk/">https://actearly.uk/</a> and also email <a href="mailto:prevent@arden.ac.uk">prevent@arden.ac.uk</a>

## 8. Martyn's law

In response to Martyn's law and to prepare for the Protect Duty a risk assessment and security plan will be carried out in order to achieve a successful level of security preparedness in line with other regulatory regimes (including Fire and Health and Safety)

## 9. Following a concern

During office hours, safeguarding concerns are monitored daily by either Designated Safeguarding Officers or by People Services, dependent on the type of concern and the individual. Concerns about students and which are deemed to be either low or moderate risk will be dealt with Designated Safeguarding leads within Student Support. Details of actions taken can only be shared when a reported person has given consent. If further information is received after a concern is reported, this information should be forwarded to a Safeguarding Officer or Lead

Designated Safeguarding Persons will assess any concern raised and determine what action, if any, should be taken. Actions may include:

• Escalation of the issue to the Prevent Lead for consideration; Referral to social services, police or other relevant agencies, including when appropriate the Local Authority Designated Officer (LADO); Where the risk to life is felt to be immediate, they may request a welfare check through 999. If the student is in centre, we may request the Police or an Ambulance to attend there.



- Where possible, obtain the consent of the person to involve an additional person
  to support them if deemed necessary by the Designated Safeguarding Lead, this
  may include their emergency contact or next of kin where known, except where
  the allegation regards this person. Arden University reserves the right to
  contact these people without consent where it is judged this is in the best
  interests of safeguarding the vulnerable person but will make all efforts to gain
  consent;
- Referral to Wellbeing services for wellbeing/welfare support.
- Referral for counselling or support via Togetherall & Spectrum Life Student Assistance Programme;
- Referral to the HR Manager and relevant SMT Manager for any case involving an allegation against a member of staff.

The Prevent Lead will assess any potential Prevent-related concern raised and determine what action, if any, should be taken. Actions may include:

- Referral to social services, police or other relevant agencies, including the Channel programme;
- Seeking further advice from the relevant Department for Education Regional Prevent Coordinator.
- Designated Safeguarding Persons and the Prevent Lead will keep confidential case notes for all referrals.

Arden University recognises that its student body is internationally based and that referrals to local services will not be feasible for students who are resident outside the UK. Nevertheless, it will seek to support its international students so far as possible through providing access to Togetherall for all students and through its agreement with the West Midlands Police to relay any prevent concerns internationally wherever feasible and appropriate.

### **10.**Training for staff

All staff will undertake mandatory Safeguarding training as well as prevent training on an annual basis. Operational safeguarding members of staff will also receive Level 3 safeguarding training (every 3 years) as well as prevent training.

Arden University must comply with a new condition of registration effective from August 1st, 2025, regarding Sexual Misconduct and Harassment. As part of this, all Arden University staff members must complete specific training related to the new condition, as well as updated safeguarding training and the ability to access student training on the following topics: Bystander Intervention and Consent on Campus.



# 11. Safeguarding students who are under the age of 18

## 11.1 Students who are under the age of 18

The University no longer recruits minors to academic programmes. The details below refer only to existing students who are still classed as minors.

The University is not able to take on the usual rights, responsibilities, and authority which parents or guardians have in relation to a minor.

The University will correspond directly with its students, not normally with parents or guardians, even where the student is under eighteen.

Parents and guardians of Blended Learning students will need additionally to understand and give consent for students to:

- 1. participate in any field trips and excursions; Risk assessments will be carried out before all field trips and excursions and participation in some activities may be limited for students who are minors.
- 2. access unregulated internet services in an unsupervised environment. Students are expected to comply with the acceptable use provisions within the University's terms and conditions.

Arden University will collect emergency contact details for all students under the age of eighteen. If an emergency arises on University premises, for example, medical or criminal, and it is not possible for the University to contact the named individual within the timescale necessitated by the situation, then the University may be required to act on the student's behalf. In such circumstances a senior member of the University will, on behalf of the student's parent or guardian, give such consent to treatment as is in the best interests of the student.

The Designated Safeguarding Persons will jointly maintain accurate records of all current students under the age of eighteen and alert module lecturers and student support coordinators accordingly at the start of each semester or delivery period.

### 11.2 Children on Campus

Children are defined as being between the ages of 0-18.

Children are only permitted on Campus for short periods (i.e. when parents/guardians need to drop something off or raise a query) and must be accompanied by their parent or guardian at all times. Children should not be left on Campus unaccompanied. Students should notify the Campus Manager or appropriate nominee when attending Campus with children.

Children are under no circumstances permitted to attend scheduled classes with their QA 57 Safeguarding Policy September 2025 P a g e | 12



parent/guardian/appropriate adult.

No child is permitted to remain on Arden University premises outside of normal campus opening hours.

Arden University reserves the right to ask for any children on site to be removed if they are considered excessively noisy or disruptive.

Please see related guidance in Section 9. of the <u>Pregnancy</u>, <u>maternity and adoption</u> <u>policy</u> concerning breastfeeding.

### 12. Anonymous reports

Anonymous concerns will be acted on due to the fact Arden understands that there may be reasons behind someone not feeling able to identify themselves. However, support may be limited dependent on the detail of information received. Please see related guidance in Whistleblowing Policy for Students.

Arden University must comply with a new condition of registration effective from August 1st 2025 regarding Sexual Misconduct and Harassment. As part of that, we have introduced a new reporting form explicitly for incidents and/or reports related to Sexual Misconduct and Harassment. As part of this, students, staff or visitors can choose to report incidents anonymously or non-anonymously. For further details, please visit the single source of information <a href="here">here</a> or the Bullying, Harassment and Sexual Misconduct Policy at this link Arden University | Regulatory Framework

## 13. Malicious reports

Disciplinary action may be taken against an individual raising a concern that is deemed to be malicious, frivolous or in hope of seeking revenge.

### 14. Reports of allegations against members of the Arden University community

As mandated by statutory guidance, any concerns raised against a member of the University community which suggests a child or vulnerable adult is being harmed will be escalated to the Local Area Designated Officers (LADO). A LADO is an employee at the local authority who can give advice to employers and organisations and individual who have concerns about an adult who works with children and/ or vulnerable adults

Allegations about a staff or students may be considered under Staff Disciplinary Policies or <u>Student Disciplinary procedures</u>.

#### 15. Student Information

Students will be advised about University procedures about safeguarding and prevent through induction, Student Handbooks, the University's terms and conditions (in relation QA 57 Safeguarding Policy September 2025

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to online monitoring and acceptable use policies) and publication of this policy. Students are further advised on the tolerant and respectful behaviour required of them via the Student Charter and Student Handbooks.

## 16. Confidentiality and information sharing

Staff should only disclose information or sensitive information about students with nominated safeguarding or prevent contacts. All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard minors, adults and those at risk of radicalisation. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Persons and the Prevent Lead.

## 17. Service hours and out of hours support

Safeguarding referrals are monitored during office hours: Monday to Friday 9am - 5pm.

Outside standard business hours or during holidays:

If you are concerned about the risk to a child/vulnerable adult outside business hours and expert advice is needed, you can contact the local Children's Social Care or Adult Social Services. Or you can contact:

- NSPCC Helpline 0808 800 5000 Mon- Fri 8am 10pm or 9am 6pm at the weekends
- Domestic Abuse Helpline Tel 0808 2000 247, 24 hours a day. You must also report this via the safeguarding form.

Details of other external agencies that can offer immediate support can be found on the Wellbeing Portal here: <u>Help in a Crisis</u>

### 18. External speakers

Any external speakers, whether contributing via the VLE or face to face at a Campus, must be approved in advance through completion and consideration of the checklist found in <u>QA58 Approval of External Speakers</u>. All requests must be submitted a minimum of two weeks before the event/date of speaking. External speakers must always be accompanied by a designated safeguarding lead/officer.

## 19. Staying safe online

Online learning and teaching offer flexible opportunities however, it is not without its challenges.

The internet can be used to harass, bully, or intimidate, especially people in vulnerable groups. Staff members should report any incidents relating to this via safeguarding channels. If you become concerned about a student's behaviour, wellbeing, or safety



online, student support services should be contacted.

Please refer to the <u>Student Code of Conduct policy</u> for guidance on appropriate behaviour, principles, standards, and moral expectations when studying online.

Please also refer to the <u>Acceptable Use Policy</u> at this link <u>Arden University | Regulatory</u> Framework for further information.

### 20. Support for welfare

## **20.1** Fitness to Study

# Link to policy

A Fitness to Study will be considered to addresses concerns that a student's health is jeopardising their studies or the studies of others.

## 20.2 Wellbeing services

Where there are concerns about a student's welfare and/or their mental health, a student may be access support through Wellbeing services. Students can email or be referred via <a href="wellbeing@arden.ac.uk">wellbeing@arden.ac.uk</a>

Link to the Wellbeing Services Student Portal - Home (sharepoint.com)

## 21. Online Monitoring

Arden University undertakes automated online monitoring of areas of its VLE that are not directly managed by staff, including direct messaging via its VLE and student blogs. Students are advised of this practice via the terms and conditions.

Weekly reports of the automated monitoring process, identifying any terms that are linked to terrorism or extremism, are monitored by the Prevent Lead or nominee to determine whether there is any cause for concern.

## 22. Reporting and Review

The Academic Board will receive a report annually on the number and type of referrals made. Where no referrals are made, a nil report will not be required.

The number of referrals made will be reported to the Students, Quality & Standards Committee at each meeting. Again, nil reports are not required.

Safeguarding referrals are stored for as long as necessary for the purpose for which it was obtained.

The safeguarding and prevent policy and associated procedures are reviewed at least every two years, or in the following circumstances:

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- changes in legislation and/or government and/ or regulatory guidance;
- Following any other significant change or event.



# 23. Links to policy

Cause for concern Procedure

Fitness to Study Policy

Pregnancy, maternity & adoption Policy

**Student Code of Conduct** 

Student Disciplinary procedure

Whistleblowing policy for students

Bullying, Harassment and Sexual Misconduct Policy Arden University

Regulatory Framework

Acceptable Use Policy <u>Arden University | Regulatory Framework</u>

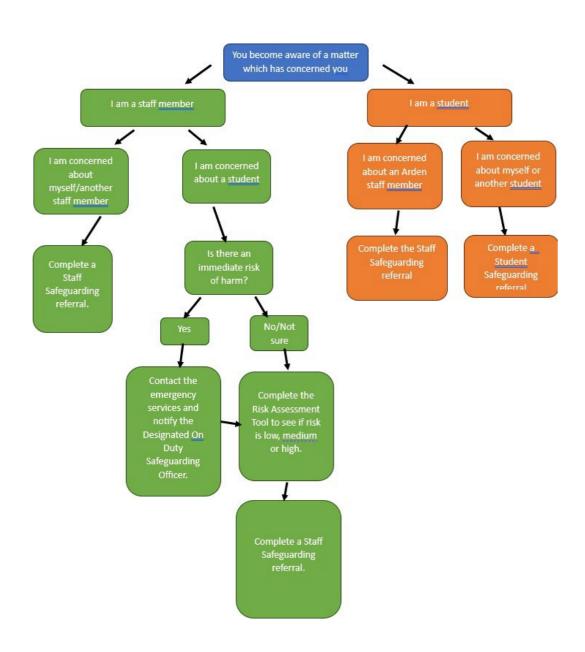
Policy Name	Safeguarding and Prevent Policy	
	Statement	
Policy Reference	QA57	
Approval Authority	Academic Framework, Regulation and	
	Policy Committee	
Last Approved	September 2025	
	Republished Nov 2025 with amended web	
	links	
Responsible SMT Lead	PVC Student Experience	
Responsible Department	Student Experience	
Policy Contact	Head of Student Success	
Review frequency	Annual	



# **Safeguarding flowchart**

# **Student Safeguarding Referral Form**

# **Staff Safeguarding Referral Form**





**Safeguarding referral forms** 

Report a safeguarding concern about a student
Report a safeguarding concern about a member of staff



## Safeguarding roles and responsibilities

## **Principal Designated Safeguarding Officer**

Debbie Groom - Head of Student Success - dgroom@arden.ac.uk.

### **Prevent Lead**

Steve Clayton – Pro Vice Chancellor (Effectiveness, Quality & Compliance) - sclayton@arden.ac.uk

## **Designated Safeguarding Officers (DSOs)**

- Beth McCluskey Head of HR <u>bmccluskey@arden.ac.uk</u>,
- Basra Khan Mental Health & Wellbeing Adviser 07543 314695
- Emily Ditton Mental Health & Wellbeing Adviser
- Jodie Comrie Mental Health & Wellbeing Adviser
- Hannah Martin Mental Health & Wellbeing Adviser
- Steph Petrou Wellbeing Services Manager
   Neyazul Haque Mental Health & Wellbeing Adviser
   (Tower Hill) Paul Guy Mental Health & Wellbeing
   Adviser (Manchester)
   Bet Rosell Tinker Mental Health & Wellbeing Adviser
   (Birmingham) Danielle Opara Mental Health & Wellbeing
   Adviser (Holborn)

Rob Schofield - Mental Health & Wellbeing Adviser (Leeds)

# **Designated Safeguarding Leads (DSLs)**

Distance Learning	Kim Roddis – Head of Development & Engagement Lauren Donnelly – Student Success Team Leader	
	Helen Duff – Student Success Team	
	Leader	
Birmingham Campus	Sarah Boles – Lead Student Hub Advisor	
Holborn Campus	Evelyn Gordon – Lead Student Hub Advisor	
Ealing Campus	Zarmina Ahmed – Lead Student Hub Advisor	
Tower Hill Campus	Tony Nkhoma - Lead Student Hub Advisor	
Leeds Campus	To be confirmed.	
Manchester Campus	Becky Appleton - Lead Student Hub Advisor	
Berlin Campus	Sarah Bejkar – Lead Student Hub Advisor	



Apprentices	Maxine Collison – Internal Quality Assurer	
	Apprenticeships	
	Helena O'Brien – Degree Apprenticeship	
	Coach	
	Asta Vegeleviciute – Degree	
	Apprenticeship Coach	
People Services Beth McCluskey – Head of HR		



#### **Staff Guidance**

### **Disclosures of Abuse:**

These may come in many forms and should all be taken seriously:

- A vulnerable person may confide in you that they are being abused
- Someone may report to you that someone else has confided in them that they are being abused or that they have a suspicion of abuse
- Someone may display signs of abuse as listed above
- The behaviour of, or a change in the behaviour of someone may suggest that they are being abused
- A colleague may confide in you that they have abused a child/young person/ adult in a vulnerable situation
- The behaviour of, or a change in the behaviour of a colleague, may suggest that they are abusing a child/young person/ adult in a vulnerable situation

If a student discloses that they are being abused or provides any information suggesting that this is the case, staff should follow the guidance below.

DO

- Remain calm, accessible and receptive
- Ensure you are meeting the student at an appropriate place (i.e., private)
- Listen carefully without interrupting or asking leading questions
- Communicate with the person in a way that is appropriate to their age, understanding and preference
- Be aware of the non-verbal messages you are giving
- Make it clear that you are taking them seriously.
- Acknowledge their courage and reassure them that they are right to tell.
- Reassure them that they should not feel guilty and say that you're sorry that this has happened to them.
- Let them know that you are going to do everything you can to help them and what may happen as a result.
- Make a note of what was said, using the person's actual words wherever possible
- Make note of your observation (signs of abuse, if any)
- Complete safeguarding referral form (appendix 2) (if urgent contact a safeguarding officer immediately) and send to the appropriate member of the safeguarding team, or Designated Safeguarding Lead.



### DON'T

- Judge the person
- Investigate or seek to prove or disprove possible abuse Investigate, suggest or probe for information
- Make promises about confidentiality or keeping 'secrets' some wording that may help is "I can't promise to keep this to myself as I may need to seek more help for you".
- Jump to conclusions, be dismissive or react with shock, anger, horror etc.
- Speculate or accuse anybody
- Offer opinions about what is being said or the persons allegedly involved
- Confront another person (adult or child/young person) allegedly involved
- Forget to record what you have been told
- Assume that someone else will take the necessary action
- Fail to pass this information on to a safeguarding officer



## **Safeguarding examples**

### Example 1

You are in a meeting with Ben when he tells you about Alex, his ex-partner. Alex has threatened to tell the Police that Ben is causing harm to the children they have together unless he gives Alex more money each week in child support. Ben is distressed as he is already in debt and fears he will not be allowed to see his children anymore and may be arrested.

**This is a concern that you should report.** It is not for you to determine if Ben is physically harming his children, but he is being harmed by someone trying to manipulate him to gain more money. The financial abuse element would mean the Safeguarding Concern would have to be logged.

## Example 2

Anne is a student that you are currently supporting; she began university by being reserved. You have noticed that lately Anne has been hanging around with new people, has started drinking and smoking. Anne is sometimes late for 9.00am lectures but never misses them completely.

**Anne's behaviour may not be a safeguarding concern.** It appears she is adjusting to being at university and has made new friends who might be having an influence on her. Unless Anne is being manipulated to drink, smoke or go out late, there may be no harm or risk of harm causing the change in Anne.

### Example 3

Raheem has informed you that he may not be able to attend graduation because his family want him to go on holiday overseas as soon as he finishes his final exams. Raheem tells you that he is concerned that he is going to be forced to marry someone whilst he is on holiday. Two years ago, his older brother Hassan was taken on holiday after his exams finished and his family hid his passport from Hassan until he agreed to marry someone whilst overseas. Raheem is worried the same thing will happen to him: he has no plans to marry and does not want to go on the holiday.

**This is a concern that you should report.** Raheem is at risk of harm.

### Example 4

Dawn has been set an assignment to log her activities and thoughts for 2 weeks. Upon submission of the log, we can see that Dawn references to her belief that she is being watched and that she feels someone is tampering with her phone. Dawn also feels that the news has a hidden agenda as they report negative stories about her religion. Dawn expresses thoughts of frustration and anger about what she feels is happening.

**This is a concern that you should report.** Although Dawn may be exploring politics in her surrounding environment, she may be at risk of radicalisation. It is not for you to determine if Dawn could be radicalised, but the apparent tendency to see a



conspiracy as well as the feeling that her religion is being treated unfairly in the media may need to be explored.

## Example 5

Chen is an international student in her first year but has missed a large number of lectures. She asks to speak to you as she has run out of money. Chen tells you that she started seeing an older man a few months ago and in exchange for him taking care of her and letting her live with him, he has access to her bank account and leaves her with a small amount of credit on her mobile phone. She has no money to get the bus in for lectures and has no money to buy food, relying on what her boyfriend provides.

**This is a concern that you should report.** Chen is at high risk of harm and may also be at risk of being groomed.

## Example 6

Don is a Political Science lecturer and has always encouraged in-class debates, asking students for their opinion on controversial subjects (such as hunting and abortion), and then asking them to argue for the opposition. Recently Don set up a lunchtime debate society but only allows students he has invited to attend. Alison was invited to a meeting and has come to you to express concerns about Don. She tells you that Don didn't hold a debate but spent 20 minutes expressing his support for the English Defence League. Alison feels she heard Don say that "the Nazis knew how to run things".

**This is a concern that you should report.** Although encouraging students to think about situations from a different perspective can be useful, the beliefs expressed during the debate society meeting are concerning. The far-right views being expressed by Don could be an indicator of an extremist view, and possibly having accessed hate rhetoric.



# Risk assessment tool

Low (1)	Medium (2)	High (3)
First presentation of risk, e.g., low mood, panic, anxiety. Concerns are likely to be managed at triage stage only and / or be managed via routine case management. Professional judgement or concerns of repeated low-level harm may progress to a safeguarding enquiry.	Concerns of a significant nature will receive additional scrutiny and are likely to require safeguarding triage and may progress to a safeguarding enquiry. Concerns are likely to be isolated and are unlikely to affect other people. The concern should be an isolated incident.	Immediate risk to the person(s) has been identified; this can be in relation to immediate risk of homelessness and 999 Concerns. Mental Health concerns where a student has suicidal ideation and has the means to act would also warrant high risk. Concerns of this critical nature will be escalated to overseeing safeguarding leads: Caroline Pike, Suzie Mitchell, Hannah Martin or Basra Khan.
Is the risk: No impact Unlikely to recur	Is the risk: Some impact but not long lasting Possible to recur	Is the risk: Serious long-lasting impact Likely to recur



## **Recognising abuse and neglect**

## **Physical abuse**

This includes hitting, slapping, pinching, pushing, misuse of medication and inappropriate holding or restraint. It may also include inappropriate sanctions or punishment and rough handling.

### Possible indicators:

- History of unexplained falls
- Unexplained bruising in well protected or soft parts of the body e.g., ears or buttocks
- Multiple bruising in different stages of healing
- Unexplained burns unusual location or type
- Unexplained fractures
- Unexplained lacerations or abrasions
- Slap, kick punch or finger marks
- Injury shape similar to an object
- Untreated medical problems
- Weight loss due to malnutrition or dehydration

#### Sexual abuse

Examples: rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual acts or indecent exposure to which the adult has not consented or was pressured into.

## Possible indicators:

- Sudden change in behaviour
- Sudden onset of confusion
- Incontinence
- Withdrawal
- Overt sexual behaviour/language by the adult
- Self-inflicted injury
- Disturbed sleep pattern/poor concentration
- Difficulty in walking
- Torn, stained underwear
- 'Love bites'
- Pain/itching/bleeding or bruising in genital area
- Sexually transmitted disease/urinary tract/vaginal infection
- Bruising to upper arms and thighs



- Frequent vaginal and urinary tract infection
- Severe upset or agitation when bathing
- Pregnancy in a person who is unable to consent

People find sexual abuse particularly difficult to speak about. Patience and empathy are essential.

## **Financial abuse**

Examples: fraud, theft, taking property without permission, assuming ownership of money or items, scamming (which can be in person, by letter, phone and internet), coercion in relation to an adult's financial affairs including the writing of or changing a Will, and misuse of benefits. Financial abuse can involve small and large amounts of money or value of property.

### Possible indicators:

- Sudden inability to pay bills
- Sudden debt
- Unexplained or unusual patterns of cash withdrawal from an account
- Lack of belongings that the adult can clearly afford
- Resistance by family to give explanation for unusual financial activity
- Extraordinary interest by family in an adult's assets
- Purchase of items that the adult would not usually buy or need
- Personal items going missing
- The main interest shown by a family member is financial and not the in relation to the care of the adult

#### **Discriminatory abuse**

Examples: discriminatory abuse is often on the grounds of age, race, gender or gender identity, culture, religion, sexual orientation or disability.

## Other examples of abuse include:

- Hate crime (acts of violence or hostility directed at people because of who they are or who someone thinks they are)
- 'Mate crime' (sometimes used to describe a crime committed against an adult by someone who has befriended them)
- Derogatory comments
- Harassment
- Being made to move to a different resource/service based upon an adult's age
- Being denied medical treatment on grounds of age or mental health

### **Emotional/Psychological abuse**

Examples: threats of harm or abandonment, blackmail, deprivation of contact, humiliation and ridicule, blaming, controlling, intimidation, coercion, harassment, isolation, cyber bullying, shouting and swearing, unreasonable support of services or



support networks, denial of cultural or religious needs, denial of access to the development of social skills.

### Possible indicators:

- Change in appetite, weight loss or gain
- Low self esteem
- Upset and tearfulness
- Confusion and agitation
- Insomnia
- Avoiding eye contact, withdrawal
- Isolation, unable to make contact
- Distress
- Poor hygiene, resulting from restricted access to facilities
- Uncharacteristic behaviour

## **Neglect (and acts of omission)**

Examples: ignoring medical, emotional or physical needs; failure to provide access to appropriate health, care and support or educational services; withholding the necessities of life including medication, adequate nutrition and heating.

## Indicators (but are not limited to):

- Poor environmental conditions
- Inadequate heating and lighting
- Poor physical condition of the adult
- Malnutrition
- Clothing is ill-fitting, unclean or in poor condition
- Isolation of the adult
- Withdrawal, unhappiness or change in demeanour
- Carer's reluctance to engage with professionals
- Carers not allowing contact by professionals with the adult

## **Self-neglect**

Examples: self-neglect can sometimes be as a result of a person's choice of lifestyle and covers a wide range of behaviour including neglect to care for one's personal hygiene, health or surroundings and can include hoarding when it becomes extreme (including animal hoarding). In these circumstances there is no abuser.

### Possible indicators:

- Living in grossly unsanitary conditions
- Suffering from untreated illness or disease/condition
- Suffering from over or under eating to the extent that if untreated the adult's physical or mental health could be impaired



- Creating a hazardous situation that would likely cause serious physical harm to the adult or cause substantial loss of assets

## Organisational/Institutional abuse

Examples: Neglect, poor practice within an institution such as a care home or hospital and also poor practice in relation to care provided in the adult's own home. This can be only one incident or a series of incidents which identifies neglect or poor practice resulting from an organisations poor policies, procedures and practice.

It is important not to jump to the wrong conclusions too quickly, but the following list may be possible indicators of institutional abuse:

- No flexibility in bedtime routine and/or deliberate waking
- People left on a commode or toilet for long periods of time
- Inappropriate care of possessions, clothing and living area
- Lack of personal clothes and belongings
- Un-homely or stark living environments
- Deprived environmental conditions and lack of stimulation
- Inappropriate use of medical procedures such as enemas, catheterisation
- Batch care lack of individual care programmes
- Illegal confinement or restrictions
- Inappropriate use of power or control
- People referred to, or spoken to with disrespect
- Inflexible services based on convenience of the provider rather than the person receiving services
- Inappropriate physical intervention
- Service user removed from the home or establishment, without discussion with other appropriate people or agencies because staff are unable to manage the behaviour

#### **Domestic abuse**

The Home Office definition of domestic abuse (2013):

- Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality
- Includes psychological, physical, sexual, financial, emotional abuse; so, called 'honour' based violence; Female Genital Mutilation; forced marriage
- Includes anyone aged 16 or over

Many people think that domestic abuse is about intimate partners, but it is clear that other family members are included and that much safeguarding work that occurs at home is, in fact is concerned with domestic abuse.



## **Modern slavery**

Modern slavery includes slavery, human trafficking, forced labour and domestic servitude.

Traffickers are those who arrange for the people to move from place to place to do the tasks that they are made to do. It includes moving within the UK and doesn't have to be from abroad. You may often hear the words 'harvesters' or gardeners' used in relation to the victims of modern slavery being made to grow and look after cannabis farms. Very often the traffickers trick victims into believing that they are arranging for them to have a better life and genuine employment.

### References

https://www.ssaspb.org.uk/Reporting-Abuse/What-is-abuse.aspx