

SAFEGUARDING POLICY FOR STUDENTS

1. Introduction

- 1.1 The University of Kent recognises that it has a legal duty to ensure, as far as is reasonably possible, the health, safety and welfare of all children or vulnerable adults that make use of its services and facilities. It is also committed to ensuring that a safe and supportive environment exists for all students and visitors to the University. The University also recognises that there are a variety of circumstances in which children and vulnerable adults will be admitted to the University or come onto University premises or otherwise have contact with University staff, students or contractors.
- 1.2 The University is committed to protecting children and vulnerable adults from harm, exploitation and abuse and to ensuring that designated staff are aware of their responsibilities in relation to safeguarding.
- 1.3 This Policy sets out the University's approach to safeguarding students within the University and should be read in conjunction with the Safeguarding Procedure for Students (see section 9 onwards).
- 1.4 This Policy will also be used to safeguard any Kent student at risk of being drawn into extremism.

2. Definitions

- 2.1 For the purpose of this Policy the term 'young person' or 'young people' denotes a currently registered Kent student or students who is/are under the age of 18.
- 2.2 The term 'vulnerable adult' (also known as 'adult at risk') denotes a person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. The terms 'vulnerable adult' and 'adult at risk' are used interchangeably throughout this document.
- 2.3 The University accepts the view outlined in the statutory guidance on Working Together to Safeguard Children (2015) that there are four main categories of child abuse, namely:
 - a) **Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a young person;
 - b) **Emotional abuse:** would involve causing a long-lasting impact on the emotional development of a young person. For example, saying that a young person is worthless, unloved or inadequate. It may also involve seeing or hearing the abuse of another, including domestic violence, and may cause a young person to be frequently frightened;
 - c) **Neglect:** this involves continual failure to meet a young person's basic physical and emotional needs, such as providing sufficient food, clothing and a safe home;
 - d) **Sexual abuse:** involves forcing or persuading a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

- 2.4 In the case of vulnerable adults the University accepts the Department of Health guidance in relation to the main different categories of abuse from the document No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse.
- a) **Physical abuse:** including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions;
 - b) **Psychological abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;
 - c) **Neglect and acts of omission:** including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating;
 - d) **Sexual abuse:** including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting;
 - e) **Financial or material abuse:** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits; and
 - f) **Discriminatory abuse:** including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
- 2.5 It is recognised that young people and vulnerable adults may be abused by other young people and adults.

3. Scope

- 3.1 This Policy and the associated procedure apply to **all** University activities, undertaken at any University campus in the UK. This Policy applies to all staff and students of the University, including those that do not have a specific role in relation to safeguarding matters, and sponsored visitors or contractors engaged by the University who may come into contact with a young person as part of their work or activities.
- 3.2 The University recognises that it has certain legal obligations and duties to safeguard the welfare of children who come onto its premises or come into contact with its staff or students, including under the Children Acts (1989 and 2004) and statutory guidance on Working Together to Safeguard Children (2015). Additionally, where University staff may occupy a particular position of trust with regard to children with whom they come into contact, an improper relationship with a young person in these circumstances is likely to constitute an abuse of trust, which is an offence under the Sexual Offences Act (2003). The University also has the option, under the Rehabilitation of Offenders Act (1974), to enquire as to the criminal records history of staff or students to assess any risk to young people.
- 3.3 The University also recognises that it has a duty to report the suspected abuse of any young person or vulnerable adult, for activities organised by its staff, whether or not that person is a member of the University community.

4. Safeguarding Roles

- 4.1 **Strategic Sponsor for Safeguarding:** The University has designated the Pro Vice-Chancellor with responsibility for students as the University's strategic sponsor for safeguarding.
- 4.2 **Senior Safeguarding Officer (SSO):** The University has designated the Director of Student Services as the Senior Safeguarding Officer (SSO).
- 4.3 **Safeguarding Officers:** Schools and Departments are required to nominate local Safeguarding Officers (SOs), to further support regular activities involving young people taking place or organised within that School or Department. The SO role will hereafter be referred to as the **Designated Safeguarding Officer (DSO)**.
- 4.4 The safeguarding responsibilities of the SSO and the DSO can be found in Appendix 1

5. Safeguarding Procedure

- 5.1 The University recognises its responsibilities to safeguard the welfare of young people, and, where necessary, to work closely with statutory and voluntary local agencies to ensure that young people and vulnerable adults are not put at risk of harm or abuse. The University also recognises that abuse can take many forms and may be physical, sexual or emotional or may arise through neglect.
- 5.2 The University has developed a Safeguarding Procedure (see section 10 onwards) which sets out the overall processes by which University staff or students can report concerns about a young person's or a vulnerable adult's welfare within the University.
- 5.3 The Safeguarding Procedure for Students identifies key individuals within the University who are responsible for responding to safeguarding concerns and liaising with the appropriate agencies.

6. Public Interest Disclosure (Whistle Blowing)

- 6.1 The University encourages a responsible and transparent approach to working with young people and adults at risk and will promptly respond to all concerns raised under this Policy and Procedure. There will be no repercussions where concerns/allegations are reported in good faith, and not for personal gain, but any reported concerns/allegations will not be taken further by the University or external authorities if found to be vexatious in nature.

7. Safeguarding Good Practice Guidelines

- 7.1 The University has drawn up Safeguarding Good Practice Guidelines (see Appendix 2) for staff and students that come into contact with young people or vulnerable adults as part of their work for the University. The guidelines set out examples of behaviour towards young people and vulnerable adults which may be regarded as appropriate and inappropriate.
- 7.2 The Guidelines are intended not only to safeguard young people and vulnerable adults from harm but also to ensure that staff or students are not put in a position where their

conduct or integrity can be questioned. In the case of a contractor, failure to follow the guidelines may result in the termination of their contract.

8. Students Aged Under 18

- 8.1 The University may admit a young person as a student who might be much younger than the rest of his or her cohort.
- 8.2 The suitability of a person aged under 18 for admission is a matter to be determined by the relevant School/Centre Admissions Team, but once admitted as a student, the University has a responsibility to safeguard that student's welfare. These responsibilities are set out at the admissions stage of the application process, information for which can be found on the University web site at:
https://www.kent.ac.uk/applicants/information/policies/minimum_age.html

9. Kent Union

- 9.1 Kent Union has its own Student Activities Safeguarding Children and Vulnerable Adults Policy, which can be found at:
<https://www.kentunion.co.uk/eandv/policiesandprocedures/>

SAFEGUARDING PROCEDURE FOR STUDENTS

10. Introduction

- 10.1 The University recognises that abuse or risk of harm to a young person or vulnerable adult may take many different forms and that individuals may have different perceptions of what constitutes harm or abuse. The University regards harm or abuse of a young person to include any physical, sexual or emotional abuse or neglect. It is recognised that some Schools/Departments that deal frequently with young people will have in place more detailed procedures relevant to their particular activities. It is the responsibility of the relevant Head of School or Department to ensure that their procedure conforms in full with this procedure.
- 10.2 These procedures establish a mechanism by which concerns about a young person's or vulnerable adult's welfare or risk of harm arising within, or in connection with, the University can be addressed quickly and appropriately.
- 10.3 As far as possible the confidentiality of all individuals involved in safeguarding concerns will be respected. However, there will be circumstances in which it is necessary for a DSO to share information with third parties such as the Kent Safeguarding Children's Board, the police or the young person's or vulnerable adult's parents or guardians.

11. Areas of Risk

- 11.1 There are a wide range of activities undertaken or facilitated by the University which may bring a young person into contact with University staff, students, contractors, or onto University premises. The following are identified as examples of such activities which may present key areas of risk. This list is not exhaustive:
- Organised visits, summer schools and other outreach activities on University premises;
 - Outreach activities undertaken in schools and other venues away from University premises;
 - Young people staying in University managed halls of residence;
 - Young people attending University premises for sporting or other recreational or social purposes;
 - Young people being the subjects of research by University staff or students either on campus or elsewhere;
 - Young people registered as students of the University;
 - Young people employed by the University;
 - Young people carrying out work experience at the University;
 - Young people attending school holiday clubs;

Young people attending the day nursery on campus will come under Kent Union's safeguarding policy.

- 11.2 If any staff member is unsure as to whether the nature of any activity may pose a risk to the safeguarding of young people, then they should seek advice or guidance from the local DSO, who may refer the matter to the SSO.
- 11.3 The University recognises that staff, students and contractors are not expected to be experts in the field of safeguarding. However, they do have a duty to:
- Be alert and responsive to problems and the potential indicators of physical, mental or emotional abuse or neglect;
 - Be alert and responsive to the risks which individual abusers or potential abusers may pose to young people or vulnerable adults;
 - Be alert and responsive to situations and activities during which young people or vulnerable adults may place themselves at risk of abuse, neglect or other harm;
 - Be alert and responsive to situations and activities which may pose a more general risk to the health and safety of young people or vulnerable adults.

12. Risk Assessments for Organised Activities

- 12.1 A risk assessment must be completed by the organisers of any activity specifically intended for young people and which brings them onto University premises or into contact with University staff, students or contractors. Once completed, the risk assessment documentation must be approved by a member of the Safety, Health and Environment Unit. Guidance on completion of the risk assessment is available from the University's Health & Safety Unit and can be found on the University web site at: <https://www.kent.ac.uk/safety/hs/pages/Riskassessment/risk-assessment.html>.
- 12.2 The organisers must also ensure that the University's insurers have been adequately informed about the activity and any potential risks, before the activity takes place.
- 12.3 It is expected that for visits by schools or other organisations where members of staff of that school/organisation are in attendance, the school/organisation will complete its own risk assessment and take its own safeguarding measures, in accordance with local education authority guidelines, where relevant. The host University School/Department must ensure that the visiting school/organisation has in place a safeguarding policy and procedure.

13. Reporting Safeguarding Concerns

- 13.1 The University expects all staff, students and contractors to be alert to any concerns about the welfare of children and to report any such concerns they may have, however apparently trivial, to a DSO. Staff, students and contractors are also expected to co-operate fully with any police or Social Service enquiries that may arise into an allegation of abuse. While individual members of the University have the right to report incidents direct to Social Services they should, where possible, consult first with the local DSO for their Department/School or the SSO.
- 13.2 The person reporting a concern should make a full note of the facts that gave rise to their concern and notify the local DSO for their School/Department as soon as is practically possible. The DSO will complete an Incident Report Form, a copy of which can be found on the University web site at: <http://www.kent.ac.uk/studentsservices/policies.html>

The DSO will provide a copy of the Incident Report Form to the SSO, who will keep a record of all reported concerns for a period of up to six years.

- 13.3 Concerns **must** be reported as soon as possible and where a young person or vulnerable adult may be at immediate risk of harm or abuse, a DSO must be notified verbally straight away and an Incident Report Form completed as soon as reasonably possible thereafter.
- 13.4 It is the responsibility of the DSO when notified of a concern to consider the seriousness of the incident and, if they deem it appropriate, contact the Kent Safeguarding Children's Board or Kent Police, in accordance with the specific guidance and training s/he has received.
- 13.5 Whether or not notification to the Kent Safeguarding Children's Board is deemed necessary, the DSO shall in any event also notify the SSO of any other action taken or proposed to be taken arising out of the incident (for example the provision of specific training).
- 13.6 The DSO will be responsible for ensuring the young person is in a safe environment until the appropriate local agencies have become involved. Where appropriate the DSO will reassure the young person or vulnerable adult concerned of the process underway, and if appropriate to ascertain any relevant factual information. However the DSO should only ask questions of the young person that are necessary to clarify whether there is an allegation of abuse. **It is not the responsibility of the DSO to investigate the allegation(s) made. The DSO's role is to listen, gather the relevant information and report the matter to the appropriate local agency.**
- 13.7 Advice on reacting to suspicions, allegations and/or disclosures is attached as Appendix 3.
- 13.8 If at any time, a member of staff or a student is unsure as to what action they should take, or how to handle a situation, they must seek advice from the local DSO for their School / Department or the SSO. DSOs at Medway may wish to discuss their concerns with the Master for Medway, who will act as the lead DSO for that campus.
- 13.9 If the person who first becomes aware of the concern feels it inappropriate to involve a DSO or the SSO, or disagrees with the view given by either party and is of the view that the matter should be reported, s/he is entitled to notify the police or the Kent Safeguarding Children's Board directly.

14. Other Considerations

- 14.1 The safeguarding of vulnerable students is paramount, particularly those who may be at risk of being drawn into extremism. A member of staff concerned that a vulnerable student might be at risk of being drawn into extremism should discuss these concerns with a DSO in the first instance.
- 14.2 In most cases it would be appropriate to respond to these concerns through welfare arrangements and processes within the responsibility of the Directorate of Student Services or within an academic school. These processes include the possibility of obtaining specialist advice, where appropriate, from the University's Centre for Child Protection.

- 14.3 It would be open to the Director of Student Services (SSO) or DSO to consult with the Prevent Coordinator within the Office of the Vice-Chancellor, who may in turn consult informally with a Coordinator from Channel about the general circumstances of the case, but without at that stage making a formal referral to the Channel process or divulging the identity of the vulnerable adult that is at risk of being drawn into extremism. Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremism. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.
- 14.4 Any formal referral of a vulnerable student that is at risk of being drawn into extremism would be made only if there was a judgment that University processes were inadequate. Referral would require the concurrence of the Pro-Vice Chancellor with responsibility for students or, in his/her absence, another member of the Executive Group.
- 14.5 In exceptional circumstances, for example, in cases where there might be a risk of immediate harm to a vulnerable student or a third party, it would be open to a Head of an Academic School/Director of Professional Services (or representative) or a senior member of the university security staff, to consult directly with the Prevent Coordinator, and/or a member of the Executive Group, about the need for direct contact with the Channel Coordinator.

15. Dealing with Allegations of Staff Misconduct

- 15.1 If a safeguarding incident involves an allegation against a member of staff the DSO will notify the SSO who will refer the matter to the Director of Human Resources or an Assistant Director. Referral to the Human Resources (HR) department should take place irrespective of whether a police investigation into a possible criminal offence is taking place.
- 15.2 The member of staff will be dealt with using the appropriate HR policies and/or procedure. A member of staff may be subject to formal disciplinary action, if it found that his/her conduct has contravened the Safeguarding Students: Policy and Procedure.
- 15.3 The University recognises that as an employer it has a duty of care to all its employees. Any member of staff facing an allegation and the alleged victim, if s/he is a student of the University, will be offered counselling advice and support.

16. Dealing with Allegations of Student Misconduct

- 16.1 If a safeguarding incident involves an allegation against a Kent student the DSO will notify the SSO who will refer the matter to the relevant College Master for investigation under the University's Non-academic Student Discipline Regulations. Referral to the relevant College Master should take place irrespective of whether a police investigation into a possible criminal offence is taking place.
- 16.2 A Kent student may be subject to formal disciplinary action, if it found that his/her conduct has contravened the Safeguarding Students: Policy and Procedure.

- 16.3 The University recognises that it has a duty of care to all its students. Any Kent student facing an allegation and the alleged victim, if s/he is a student of the University, will be offered counselling advice and support.

17 Review

- 17.1 The Safeguarding Students: Policy and Procedure will be reviewed annually by the Kent Safeguarding Network, to ensure the University remains compliant with UK legislation. Any proposed changes to the Policy and Procedure will be considered by the relevant University Committee/Group.

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SAFEGUARDING RESPONSIBILITIES

1. Senior Safeguarding Officer (SSO):

- a) Development and implementation of a Policy and Procedure to safeguard young people and vulnerable adults;
- b) Accountable for the University's safeguarding practice, ensuring that safeguarding is afforded the utmost priority within the University;
- c) Ensure that the Executive Group is made aware of the necessary funding and resources for the University to fulfil its safeguarding responsibilities;
- d) Effective management of safeguarding concerns within the University;
- e) Maintain an up-to-date register of Designated Safeguarding Officers. The register is available on the University web site at:
<http://www.kent.ac.uk/studentsservices/policies.html>
 The Head of the School or Department will be responsible for notifying the Director of Student Services (SSO) of any changes within his/her School/Department;
- f) Keep a secure central record of all reported safeguarding concerns for a period of up to six years, in line with the University's document retention policy.
- g) Ensure that DSOs receive advise, training and support;
- h) Create a network of Safeguarding Officers (the Kent Safeguarding Network).

2. Designated Safeguarding Officer (DSO)

- a) The local DSO may be required to undergo a Disclosure and Barring Scheme (DBS) check (formerly known as a Criminal Records Bureau check);
- b) To act as the point of contact for a School/Department with respect to any event or activity involving young people;
- c) To ensure all risk assessments are completed by the organisers of any activity specifically intended for young people in each School/Department, which brings them onto University premises or into contact with University staff, students or contractors.;
- d) Specific responsibility for responding to safeguarding concerns raised within, or in connection with, the University. DSOs will receive training and guidance appropriate for this role and to attend the necessary training and development activities that are specifically designed to support the development of the skills and knowledge required to appropriately handle safeguarding matters as and when they arise. The training will also give particular guidance regarding liaison contacts with the police, the local authority and other relevant local agencies.
- e) DSOs will also have the following responsibilities regarding the coordination and management of safeguarding issues:
 - Receive concerns and disclosures made to staff or ambassadors, decide upon the appropriate course of action and document the decisions made
 - Make referrals to the Kent Safeguarding Children's Board and Kent Police. The list of key organisations is available on the University web site at <http://www.kent.ac.uk/studentsservices/policies.html>
 - Not to investigate allegations themselves or compromise the investigations of other agencies
 - Liaise with other agencies and professionals as necessary, on a 'need to know' basis

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- Support and debrief staff and volunteers and keep them updated with appropriate information on a 'need to know' basis
- Complete the University's Incident Report Form, ensure records are completed appropriately, filed confidentially and managed in accordance with institutional and national requirements
- Provide or source appropriate and up-to-date training for specific staff, volunteers and ambassadors within the Department or School
- Keep the SSO informed of any safeguarding issues and liaise with the SSO with regard to any specific concerns
- Become a member of the Kent Safeguarding Network, to share good practice, discuss issues of concern, training requirements and to review the University's Safeguarding Students: Policy and Procedure on an annual basis
- The Master for the Medway campus, who is a DSO, will also act as a key point of contact for all DSOs at Medway

SAFEGUARDING GOOD PRACTICE GUIDELINES

- Treat young people and vulnerable adults with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- Do not use language or behaviour towards young people and vulnerable adults that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Do not engage young people in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- Wherever possible, ensure that another adult is present when working in the proximity of young people
- Do not invite unaccompanied young people into a private home, unless they are at immediate risk of injury or in physical danger
- Do not sleep close to unsupervised young people unless absolutely necessary, in which case you must obtain appropriate permission, and ensure that another adult is present, if possible
- Use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass young people and vulnerable adults or access child exploitation material through any medium
- Do not use any form of physical punishment on young people and vulnerable adults
- Do not hire young people and vulnerable adults for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Immediately report any concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with the University's Safeguarding Procedure for Students

When photographing or filming a young person or using a young person's images for work-related purposes, you must:

- Obtain informed consent from the young person and parent or guardian of the young person before photographing or filming a young person. As part of this you must explain how the photograph or film will be used
- Ensure photographs, films, videos and DVDs present young people in a dignified and respectful manner and not in a vulnerable or submissive position. Young people should be adequately clothed and not in poses that could be seen as sexually suggestive
- Ensure images are honest representations of the context and the facts
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a young person when sending images electronically or publishing images in any form.

ADVICE ON REACTING TO SUSPICIONS, ALLEGATIONS AND/OR DISCLOSURES

WHAT TO DO	WHAT NOT TO DO
<ul style="list-style-type: none"> • Stay calm • Listen, hear and take the allegations or concerns seriously • Give time to allow the young person or vulnerable adult to say what they want • Reassure and explain that they have done the right thing in sharing their comments with someone • Act immediately in accordance with the procedure in this Policy • Make a written record of what was said as soon and as accurately as possible; complete the Incident Report Form in full; a copy can be obtained from the University web site at: http://www.kent.ac.uk/studentservices/policies.html • Report to the SSO 	<ul style="list-style-type: none"> • Panic or over-react • Assume that it is unlikely the young person or vulnerable adult is in immediate danger • Don't probe for more information, as inappropriate questioning may affect how the young person's/vulnerable adult's disclosure is received at a later date • Don't make assumptions, don't paraphrase or offer alternative explanations or phrases • Don't promise confidentiality, to keep secrets, or that everything will be OK (it may not be possible) • Don't try to deal with the matter yourself; • Don't make negative comments about any alleged abuser; • Don't "gossip" with colleagues about what has been said to you; • Don't make a young person or vulnerable adult repeat a story unnecessarily.