

Safeguarding & Prevent Policy Statement

1. Introduction and Aims

Arden University is committed to the safeguarding and promotion of the welfare of all its students. 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 guidance.

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

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;
- have the opportunity to 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:
 - lecturer-led sessions, where in class or via our virtual learning environment (VLE);
 - organised online discussion forums on the VLE;
 - Arden University-led online networking groups (social media);
 - any extra-curricular activities based at an Arden University study centre.

Our safeguarding policy also seeks to ensure:

- effective management of safeguarding and prevent procedures through support and training;
- prompt response to any concerns raised;
- 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 ultimately result in dismissal or exclusion from the organisation.

2. Definitions

- 2.1 A Minor
A minor is defined as anyone who has not yet reached their eighteenth birthday.
- 2.2 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.
- 2.3 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 4 for examples and possible indicators of abuse, though this is not considered an exhaustive list.
- 2.4 Prevent
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.
- 2.5 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.
- 2.6 Radicalisation
Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

3. Designated Safeguarding Person

In the event of any concern of a safeguarding nature, a student or his/her parents/carers or chosen representative should contact the relevant Designated Safeguarding Person by emailing safeguarding@arden.ac.uk or otherwise contacting:

For **Distance Learning** students:

Sian Duffin, Student Support Manager

Arden University, Arden House, Middlesmarch Park, Coventry CV3 4JF; Tel: 02476 515 700

For **Blended Learning** students:

Debbie Groom, Head of Centre Operations

Arden University Manchester Study Centre, Linley House, 2nd Floor, Dickinson Street, Manchester;

Tel: 01618 203 893

Ljaureta Krasniqi, Student Support Manager



Arden University, 30 Holborn, London EC1N 2LX
Tel: 020 8819 0100

For **Apprenticeship** students:

Emma Ward, Apprenticeship Manager

Arden University, Arden House, Middlemarch Park, Coventry CV3 4JF; Tel: 02476 515 700

4. 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:

The University Registrar

Arden University, Arden House, Middlemarch Park, Coventry CV3 4JF; Tel: 02476 515 718.

5. Responsibilities

All staff in direct contact with students have a responsibility to be alert to the possibility of abuse, extremism or exposure to radicalisation and to raise a concern via the appropriate channel. The University expects its staff to promote tolerance and respect by acting as a role model. Guidance on how to behave if a student discloses abuse, or provides any information that suggests abuse, is included as Appendix 1.

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

The Director of Student Achievement has overall responsibility for the strategic and operational implementation of safeguarding policy.

The Registrar has overall responsibility for compliance with the Prevent Duty and for operational coordination of prevent procedures and for advising and supporting staff or students who raise concerns.

Safeguarding and Prevent Contacts will be identified for each Study Centre, they will be permanently based at that centre and will act as the 'go to' people or person on site and have responsibility for ensuring that any concerns are promptly relayed via the appropriate channel.

Under supervision of the Designated Safeguarding Person for Blended Learning students, Safeguarding and Prevent Contacts will also ensure compliance with the procedure for approval of external speakers on their site.

6. Procedures

Safeguarding or Prevent concerns should be reported immediately to the relevant Designated Safeguarding Person (see Section 3 above) or to the on-site Safeguarding Contact.

A list of Safeguarding and Prevent Contacts is provided in Appendix 2. Details of the Designated Safeguarding Person and the Safeguarding and Prevent Contacts for each study centre will also be displayed on site.

Any allegation against a member of staff with regard to safeguarding or prevent should be reported immediately to the Designated Safeguarding Person in the first instance.

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 (Registrar) for consideration;
- Referral to social services, police or other relevant agencies; 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. The 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 for counselling or support via TogetherAll;
- Referral to the HR Manager and relevant SMT Manager for any case involving an allegation against a member of staff.
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The Prevent Lead (Registrar) will then 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.

7. Admission of students who are minors

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, and it will not act *in loco parentis* (assuming parental responsibility) in relation to students who are under eighteen years.

The Admissions Department will identify any applicant who will be under the age of eighteen at the point of enrolment as a matter of routine and will advise the applicant that the University is required to seek consent from a parent or guardian prior to their enrolment on a programme of study. Parent/guardian contact details and consent to share information will be obtained from the applicant, as a condition of considering their application. The Head of Admissions will write to the parent or guardian using the template in Appendix 3. The relevant Designated Safeguarding Person will contact the parent or guardian by telephone to check their understanding of this letter, to clarify the learning experience in which the applicant would be participating and to answer any queries or address any concerns.

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:

- (i) 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.
- (ii) 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.

The 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 particular 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.

8. Student Information

Students will be advised about university procedures with regard to safeguarding and prevent through induction, Student Handbooks, the University's terms and conditions (in relation 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.

9. 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.

10. Staff Training

All student facing staff will undertake WRAP training (Working to Raise Awareness of Prevent). Designated Safeguarding Persons and Safeguarding and Prevent Contacts will undertake safeguarding training, including updates at least every two years.

11. External speakers

Any external speakers, whether contributing via the VLE or face to face at a Study Centre, must be approved in advance through completion and consideration of the checklist included as *Appendix 4 Approval of External Speakers*. All requests must be submitted to the secretary of the SMT a minimum of two weeks before the event/date of speaking. Where the answer to all questions on the checklist is 'no', the request will be deemed low risk and approval to proceed will be granted. Where the answer to any question on the checklist is 'yes', the request will be referred to the Registrar for consideration.

12. 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 practise 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.

13. 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 each month will be reported to the Operational SMT at each meeting. Again, nil reports are not required.

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

- changes in legislation and/or government guidance;
- as a result of any other significant change or event.

APPENDIX 1

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 in 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 6) (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

APPENDIX 2

Safeguarding and Prevent Contacts:

Sarah Boles - Birmingham Study Centre
sboles@arden.ac.uk

Diane Davies - Manchester Study Centre
ddavies@arden.ac.uk

Nathan Bowes - Holborn Study Centre
nbowes@arden.ac.uk

Keisha Gayle - Tower Hill Study Centre
kgayle@arden.ac.uk

Ravi Bakshi - Ealing Study Centre
rbakshi@arden.ac.uk

Aleksandra Przybylinska - Berlin Study Centre
aprzybylinska@arden.ac.uk

[Kimberly Roddis – Distance Learners](#)
kroddis@arden.ac.uk

Designated Safeguarding Person:

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Sian Duffin, Student Support Manager

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For **Apprenticeship** students:

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Arden University, Arden House, Middlemarch Park, Coventry CV3 4JF; Tel: 02476 515 700

Prevent Lead:

email prevent@arden.ac.uk or contact:



The University Registrar

Arden University, Arden House, Middlemarch Park, Coventry CV3 4JF; Tel: 02476 515 718.

APPENDIX 3

Parent or Guardian Consent Letter

Ref: STU:
 Course title:

The Parent/Guardian of:

(Address)

Date:

Dear

Course: **Intake:**

We are delighted to have received an application from your son/daughter to study with Arden University.

To comply with legislation, Arden University has procedures that apply to students who will be under the age of 18 years at the commencement of their studies.

Our policy is to treat students who are minors as we do our other students, as far as is possible. The University is not able to take on the usual rights, responsibilities and authority which parents or guardians have in relation to a minor, and it will not act in act *in loco parentis* in relation to your child and therefore we need to raise with you a number of issues.

The principal issues are as follows:

- offer of a place to study with Arden University
- teaching and other activities in an online and study centre environment
- tuition fees
- the Data Protection Act 1998

Offer of a place on an Arden University programme of study

(*student name*) application has been considered using the set entry criteria for the course for which he/she has applied.

(i) *Teaching and other activities*

Once (*student name*) has accepted a place on the course, Arden University will appoint a designated person to oversee all arrangements regarding his/her study and welfare. This designated person will have had an Enhanced Disclosure and Barring Service (DBS) check.

We must make you aware that (*student name*) will attend classes and may participate in discussions in our virtual learning environment (VLE) alongside other students, and led by staff, who may not have had such clearance.

There are no one-to-one tutorials, although (*student name*) may correspond with his/her lecturer via email on an individual basis. Equally, for any dissertation or project component, individual supervision may be required.

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

- (i) 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
- (ii) 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. Personal computing equipment brought onto the campus remains the students' own responsibility.

The 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 particular 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 Person will 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.

Contracting with the University and Responsibility for Tuition Fees

(*student name*) will normally be liable for tuition fees. It is usual for adult students (i.e. those 18 or over) to sign a contract with regard to payment of tuition fees, thus binding them to pay whatever monies they owe. Our terms and conditions are provided as part of a full offer pack, and acceptance of this offer is acceptable of these terms. **Your signature on this letter indicates acceptance of the terms and conditions set out in your son/daughter's offer pack, including liability for payment of any tuition fees.**

We understand that (*student name*) is funding her studies through Student Finance England. (*if applicable*)

- (ii) *The Data Protection Act 1998*

Under the Data Protection Act 1998, Arden University is required to keep confidential details of its dealings with all of its students, whatever their age.

We regret, therefore, that it is not generally possible for us to share with parents/guardians' details of students' progress, except with the written permission of the student concerned. We can supply a *Consent to Share Data* form, if (*student name*) wishes you to have access to his/her information.

We apologise if the above appears formal or legalistic. However, the law relating to children is now very complex and it is important that we provide you with as much information as we can. Please do not hesitate to contact us if you have any queries.

I would be grateful if you would complete the form below and return to me via email at INSERT DESIGNATED SAFEGUARDING LEAD EMAIL I would also like to contact you via telephone to discuss



and answer any queries or concerns you may have. Perhaps you could advise of a convenient time of day to contact you (NB our office hours are 09.00 – 17.00 Monday to Friday) and a telephone number to contact you on. I will try to accommodate your availability as far as possible, but due to other diary commitments I would appreciate a choice of times that you are available if possible.

I look forward to hearing from you.

Yours sincerely,

Designated Safeguarding Lead

Consent Form for Applicants under the age of 18

Name of Applicant:

Course Applied for:

I hereby confirm that I have read and accept the information outlined above regarding applicants under the age of eighteen and the full contractual information contained in the offer pack.

Name of signatory (parent/guardian):

Relationship to applicant:

Signed:

Date:

Appendix 5 – Definitions of Abuse, Signs, and Possible Indicators:

Definitions of Abuse (SSASPB):

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.

Possible indicators:

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 or harm:

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 usually no abuser. Self-harm can take many forms, including acts of suicidal intent.

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

Cuts, burns, or other unexplained injuries including broken bones, that are often frequent and varying in intensity

Suicidal statements, notes or another ideation that is shared

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>

Appendix 6 – Safeguarding Referral Form

Safeguarding Referral Form

Name of Student referring:	STU:	Position:	
Name of Student that you are concerned for:	STU (if known):	Course known) (if	Campus/DL known) (if
Incident that caused concern: (remember to record only facts not opinions or interpretation):			
Context: How did the concern arise:			
Person referred to: (Name of person at University)	Signature	Date:	