May 2017

General Policy Statement GPS3

Safeguarding Policy

1   Introduction

1.1   Middlesex University is committed to providing a safe and secure environment for all students, employees and individual visitors who access its facilities and services. The University acknowledges its particular responsibility to safeguard the wellbeing of under-18s and adults at risk engaged in the range of the University's activities. This is achieved by ensuring that there are appropriate arrangements in place to enable the University to discharge its duty to provide a safe and secure environment, to prevent abuse, and to respond appropriately to suspected or reported abuse of under-18s or adults at risk.

1.2   This policy is intended to give a framework for members of the university and contractors in the unlikely event that a safeguarding issue arises and to provide a framework to help the University prevent occurrences.

1.3   This policy recognises that student under the age of 18 study at the University.

2   Statutory Duty

2.1   Under the Children Act 1989 educational institutions have a duty to promote and safeguard the welfare of children and young people under the age of 18, and under The Children and Families Act 2014 and the Care Act 2014 Act, to protect the welfare of adults at risk. The Children Act 2004 also requires that agencies work co-operatively to protect the welfare of children.

2.2   There is no legislation in the area of safeguarding that is directed specifically at HEIs. However, there is guidance. An extract from the Executive Summary: Safeguarding Children: Guidance for English Higher Education institutions (HEIs), Department for Innovation, Universities and Skills (2007) reads:

"Effective safeguarding practice starts with having in place effective procedures. Lines of responsibility should be clear, with leadership from the highest level. Representatives from across the HEI should be involved in implementation and in contributing to a culture in which safeguarding is discussed openly. Staff with particular responsibilities will need appropriate training, and all staff need to be aware of the HEI's policy and procedures."

2.3   This policy has been written with reference to the Pan London Child Protection procedures.

2.4   This policy has been written with reference to Tier 4 sponsor guidance.

2.5   All representatives from external organisations working with the University are required to ensure that appropriate safeguards are in place to permit them to work

with under 18s and adults at risk. A risk assessment therefore must be completed before any student attends any form of work placement, including apprentices, visits and research activities. For programmes that are delivered in accordance with Professional Statutory Bodies (PSBs) the university must comply with the relevant PSB standards and guidance. In some cases (e.g. work placements) the external organisation (placement provider) may be required to provide evidence of its own safeguarding policy and procedures, and the name of their designated safeguarding officer, and this should formulate part of the placement agreement.

3   Scope

3.1   The University's values of acting with integrity, purpose and respect are embedded within its approach to safeguarding and in the working practices and accountability of the Safeguarding Board.

3.2   The University accepts its responsibility to safeguard under 18s and adults at risk who participate in University life - including registered and enrolled students as well as those who come onto university premises for organised activity. This protection covers (not exclusively):

i) Abuse/Violence (such as physical, emotional, sexual and/or psychological);
ii) Bullying and Harassment (including e-safety);
iii) Forced Marriage, honour-based violence or Female Genital Mutilation (FGM);
iv) Radicalisation.

4   Guiding Principles

4.1   The University believes that people, whatever their protective characteristics, have the right to protection from abuse, and a right to be safe in the activities that they choose. The protective characteristics as defined by the Equality Act (2010) are as follows; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, or sexual orientation

4.2   The University acknowledges its particular responsibility to safeguard the wellbeing of under-18 year olds and adults at risk.

4.3   The University is committed to providing a safe and secure environment for all who access its campuses, facilities and services.

4.4   The University recognises its duty to help university members, through guidance, support and training, to understand their responsibilities to minimise the risk of harm and exploitation of under 18s and adults at risk. All reasonable actions must be taken to prevent situations where abuse or neglect might arise or be alleged.

4.5   The University acknowledges the need to conduct a risk assessment prior to any student attending any form of work placement, including apprentices, visits and research activities.

4.6   For the purposes of this policy, the term "university member" is used to describe all staff (regardless of station), all students, volunteers, members of MdxSU, recognised visitors and contractors, and out-sourced service providers.

4.7   The definition of a "child" in child protection guidance is anyone who has not yet reached their 18th birthday. Any 16-18 year olds in this document are referred to as "under-18s".

4.8   An "adult at risk" is defined as any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

4.9   There are some activities that may increase the likelihood of an adult being at risk of abuse or neglect. These activities are regulated and are the same as those that apply to a child. Before a member of the University undertakes any of these activities, suitable disclosure and vetting procedures should also be followed. The regulated activities are:

- Healthcare
- Personal care
- General household matters e.g., with cash, bills and/or shopping
- Conducting their own affairs
- Transport to a place where they will receive healthcare, personal care or social care.

4.10   Safeguarding is described as putting in place "arrangements to take all reasonable measures to ensure that risks of harm to children or adults at risk are minimised".

4.11   Research projects, programmes of study or learning activity involving children and adults at risk require Ethics Committee approval to ensure compliance with statutory requirements and best practice guidelines.

5   Mitigating Risk

5.1   Middlesex University aims to maintain the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children and adults at risk with whom the University's work brings it into contact. The University puts this into practice through the following actions:

5.2   The appointment of a Lead Safeguarding Officer who will be responsible for:

- Leading on the implementation and promotion of this Policy;
- Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and adults at risk;
- Acting as the lead contact within the University for the protection of children and adults at risk;
- Ensuring that appropriate University Members are provided with information, advice and training on the protection of children and adults at risk;
- Establishing and maintaining contacts with the local Children's Social Care Services departments and Police;
- Maintaining confidential records of all safeguarding cases;
- Ensuring data is used intelligently to prevent future incidents;
- Ensuring that information is shared appropriately.

5.3   The appointment of Deputy Safeguarding Officers who may be nominated to deputise for the Lead Safeguarding Officer and the appointment of Designated Safeguarding Officers (DSOs) as appropriate.

5.4   The University, through DSOs, will train and supervise University Members, as appropriate, to adopt best practice to safeguard and protect children and adults at

risk from abuse and to minimise risk to themselves. This includes providing adequate information on this Policy as part of the induction process for any new University Members.

5.5   Line Managers and Heads of Departments have a duty to ensure adequate training is undertaken and information provided.

5.6   A Safeguarding Board will be maintained to oversee safeguarding for the University and will have overall responsibility for leading and monitoring the implementation of this policy. The Safeguarding Board will report annually to the Assurance Committee (a sub-committee of Academic Board).

5.7   Disciplinary procedures may be invoked where staff or students breach this policy and/or where there are allegations of covered by this policy.

6   Radicalisation and Safeguarding

6.1   The University recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The University will continue to support and empower its students to create communities that are resilient to extremism and protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will endeavour to promote the development of spaces for free debate where shared values can be reinforced.

6.2   Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues if they have any concerns regarding:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

6.3   If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism, they should raise them with a designated safeguarding officer, who can work together with external partners to address the issues.

7   Safeguarding Procedure

7.1   This policy should be read in conjunction with Middlesex University's Safeguarding Procedure.

7.2   This policy was developed and reviewed with consideration to statutory duty and relevant organisational policy and procedure, and should be read in conjunction with:

- Children Act 1989
- Children and Families Act 2014
- Care Act 2014

- Safeguarding Children: Guidance for English Higher Education Institutions, Department for Innovation, Universities and Skills 2007
- Pan London Child Protection Procedures and Practice Guidance (updated Sept 2016)
- Counter Terrorism and Security Act 2015
- Prevent Duty Guidance: for higher education institutions in England and Wales mar 2015 (updated Mar 2016)

- Cause for Concern Framework and Procedure (Sept 2016)
- Code of Practice - Student Work placement
- Staff Disciplinary Procedure (May 2016)
- Staff Code of Conduct – Working Together
- Policy on Consensual/personal relationships between staff and students (Nov 2011)
- Computer Use Policy for Staff (Feb 2014)
- Data Protection Policy (Nov 2014)
- Disclosure of Personal Records Policy (July 2014)
- Equality and Diversity Policy (revised May 2013)
- Information Sharing Policy (May 2016)
- Information Sharing Code of Practice for Cause for Concern and Safeguarding (Oct 2016)

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Chair Safeguarding Board

4 May 2017

This policy is due for review in November 2019