

# Safeguarding

1. Under 18s and vulnerable adults
2. The Prevent Duty and safeguarding people from being drawn into terrorism
3. Welfare concerns

**Safeguarding Manager**

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# Safeguarding Policy 1

## Safeguarding under 18s and vulnerable adults

This policy sets out the University's (UWE Bristol's) approach to safeguarding children and vulnerable adults where there are concerns that they are experiencing or at risk of abuse or neglect.

- For concerns about risk of radicalisation, please go to Safeguarding Policy 2 – The Prevent Duty and safeguarding people at risk of being drawn into terrorism (page 12)
- For concerns about students or staff who are out of scope of this policy, including risks of abuse from others and from self such as self-harm and suicide, please go to Safeguarding Policy 3 – Welfare Concerns (page 20)

### **Call 999 if there is an immediate risk of serious harm**

Non-urgent advice is available by contacting the [Safeguarding Manager](#) directly.

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## Definitions

The University recognises the definitions set out by Working Together to Safeguard Children 2022 and the Care Act 2014.

- **Student:** this includes home (UK), European Union (EU), offshore or international students, enrolled on any UWE programme of study and includes individuals who sit outside of the traditional scope of engagement with University activities, or where the University represents a singular component of a multi-provider programme (i.e. apprentices).
- **Safeguarding:** a term which relates to actions taken to promote the wellbeing of children and vulnerable adults and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding applies if a child or a vulnerable adult is experiencing or at risk of abuse and neglect. A safeguarding concern could include if a staff member, student or UWE process presents a risk to children or vulnerable adults.
- **Child:** someone under 18
- **Vulnerable adult:** someone who needs care and support whether or not they currently receive it; is experiencing, or at risk of, abuse or neglect; and can't protect themselves from abuse or neglect because of their **care and support needs**
- **Care and support needs:** Where because of mental or physical illness, physical or intellectual disability or frailty, practical support, also known as social care services, is needed. This support might be living in a nursing or residential home, living in a supported living placement, receiving help in their own home to carry out personal care or daily living tasks, or help to access the community

**Abuse or neglect:** could include:

- **physical:** causing non-accidental injury or trauma, over-medication, unnecessary restraint, careless manual handling, Female Genital Mutilation (FGM)
- **sexual:** any sexual act towards a child or any sexual act that an adult didn't consent to or couldn't understand. This includes **non-contact sexual abuse**, such as exposing to pornography, encouraging to watch or hear sexual acts, not taking proper measures to prevent exposure to sexual activities by others, grooming, exploitation, persuading to perform sexual acts over the internet and 'flashing'. This includes child on child sexual violence and harassment
- **psychological or emotional:** threats, intimidation, undermining, insulting, harassment, humiliation, bullying, cyber-bullying, denying opportunity, over-protection, witnessing domestic violence, coercion, being drawn into criminal activity including county-lines
- **financial:** theft, borrowing money and not repaying it, obtaining money by deception, misappropriating benefits, putting on pressure about wills, cash, property, possessions

- **neglect:** ignoring/not identifying medical, physical or emotional needs, not providing access to care, not providing adequate supervision, withholding essentials such as medication, food, water and heating
- **discriminatory:** all forms of harassment and unequal treatment based on age, disability, gender reassignment, ethnicity, pregnancy and maternity, race, religion and belief, sex or sexual orientation (protected characteristics under the Equality Act 2010)
- **institutional:** repeated poor care and treatment of vulnerable adults, and unsatisfactory professional practice
- **modern slavery:** slavery, human trafficking, forced labour and domestic servitude
- **self-neglect (adults only):** not caring for personal hygiene, health or surroundings, including behavior like hoarding which puts the person, or others, at risk

Abuse and neglect may not always be intentional but always requires a response.

Children and vulnerable adults may be perpetrators as well as victims of abuse and neglect.

## Scope

This Policy applies 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 visitors or contractors engaged by the University who may come into contact with a child or vulnerable adult as part of their work or activities. This policy also applies to situations where a student or staff member may pose a safeguarding risk outside of university activities.

For the purposes of this policy this includes the Students' Union. The University and the Students' Union are committed to working together and sharing information in order to safeguard the interests and wellbeing of children and vulnerable adults, e.g. in relation to individuals and activities with student societies and volunteering. The Halley Nursery, run by the Students' Union, and UWE Bristol International College have their own child protection policies and procedures and are therefore out of scope of this Policy and Procedure.

The University reserves the right to request appropriate safeguarding policies and assurances from contractors and placement providers. The University expects organisers bringing under-18s onto its premises, eg for conferences, summer schools or school visits, to ensure they have local safeguarding procedures and are familiar with relevant University policies.

## **Aims and objectives**

The University is committed to protecting children and vulnerable adults from abuse and neglect and to ensuring that all staff and students are aware of their responsibilities in relation to safeguarding, are alert to safeguarding concerns and know how to respond to concerns.

The University will remain mindful of its duty of care and other legal obligations, such as those under the Health and Safety at Work Act 1974, the General Data Protection Regulation (GDPR), the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

This policy sets out how the University will deal with concerns raised that indicate that a child or vulnerable adult may be at risk of abuse or neglect, and the type of action that the University may take to manage such matters and provide support.

## **Key principles**

Higher education providers are not subject to legal safeguarding duties regarding children and vulnerable adults in the same way that schools, further education colleges, local authorities, and care providers are. The University has recently engaged with expanding its delivery to include apprenticeships and as such welcomes OFSTED requirements to ensure effective procedures for keeping children, learners and vulnerable adults safe from abuse, neglect and exploitation. The University will follow best practice by putting all reasonable structures in place to support safeguarding and will take all concerns seriously, respond to concerns promptly and refer to the local authority and/or police as appropriate.

Local authorities have the responsibility to lead in investigating safeguarding concerns, but every organisation and everyone who comes into contact with a child or vulnerable adult has a responsibility to help keep them safe.

Staff and students who have contact with children or vulnerable adults directly, or with those who have caring responsibility for children or vulnerable adults, have a responsibility to be alert to the possibility that an individual may be at risk of, or has experienced abuse or neglect. It is not the responsibility of individual students or members of staff to investigate or establish that abuse or neglect has taken place.

Anyone may witness or become aware of information suggesting that abuse and neglect is or is at risk of occurring and it mustn't be assumed that someone else will share the information. It isn't everyone's responsibility to investigate concerns but it is everyone's responsibility to share concerns appropriately. Early sharing of information is key to providing an effective response to concerns.

The University will refer when necessary (and ideally, with the involved person/s consent) to statutory services. Safeguarding referrals to the relevant statutory authority will be proportionate and made on the basis of identified and considered risk, including consideration of the impact of the referral on all involved. Staff dealing with safeguarding concerns should never promise confidentiality as information may need to be shared.

The best interests of the child or vulnerable adult should never be forgotten when responding to safeguarding concerns and good safeguarding practice is proportionate and empowering. Confidential information will be shared only when necessary and only with those who need to have it.

Good safeguarding practice takes account of the wellbeing of all of those involved. Students or staff who are affected by safeguarding concerns will be offered support from within the University or signposted to support externally. All staff and students whose roles and responsibilities include regular contact with children and potentially vulnerable individuals will receive training and guidance appropriate to their role. All staff will be made aware of this policy and procedure and related guidance.

## **Processing of information**

The University is committed to complying with the requirements of data protection legislation and regulations and any personal data created as part of this policy will be processed in accordance with the University's procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

## **Sexual activity with young people aged 16-17**

It should be noted that whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences (Amendment) Act 2000 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

In cases where there are allegations against a University student volunteer or a student on placement, this should be reported as per this policy and in addition be brought to the attention of the Head of Department or Service (or nominee) who placed the student, the University Policy team and an appropriate member of staff in the host organisation.

## **Children on university sites**

The University is an adult environment and staff and students are discouraged from bringing children onto campus. With the exception of brief visits or attendance at the nursery,

students are expected to not bring children to the University. It is not appropriate for children to be in teaching or research areas. If staff or students do bring children to the University, they are responsible for those children who must be supervised at all times (with the exception of attendance at the nursery). Any visitor to the University bringing children onto campus is responsible for those children who must be supervised at all times.

## **Admission of students under 18 years**

The University has in place specific policies and procedures around managing applications from students who are under 18 years of age.

## **Reporting safeguarding concerns within UWE Bristol**

If a student or staff member believes that someone is at immediate risk of significant harm they should call the police on 999. Where a report has been made to the police with relation to the University, the student or staff member should inform the University at the earliest opportunity by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours.

Non-urgent safeguarding concerns involving staff members, including in cases where they are also a student at the University, should be reported by emailing [UWE Bristol Human Resources](#) to request a time to discuss the concerns in more detail, without inclusion of identifying information. Concerns raised regarding staff will be assessed in order to form a view on whether there is sufficient information to suggest that an incident has occurred or is at risk of occurring, such that onward referral is necessary. If there appear to be safeguarding risks then the information will be shared with the Safeguarding Manager or their nominees for further assessment.

Non-urgent safeguarding concerns should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours, or online via [Report and Support](#).

Concerns are screened at this stage to avoid inappropriate onward referral. Concerns raised will be assessed by the Safeguarding Manager or their nominees in order to form a view on whether there is sufficient information to suggest that an incident has occurred or is at risk of occurring, such that onward referral is necessary. Where possible, any external referrals will be made with the consent and knowledge of those involved. The University reserves the right to refer without consent where there is a serious risk, evidence or suspicion of a serious risk of harm or disclosure is in the public interest.



In a placement or work based learning environment (such as a professional or clinical setting) a member of staff or student should normally report any safeguarding concern in the first instance to the Safeguarding Officer or equivalent of the provider, or employer. If the student or staff member feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer, or they do not feel they have had a satisfactory response, they should follow this policy.

Advice is available by contacting the [Safeguarding Manager](#) directly.

## Associated processes

The University has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. The University is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate. Please refer to the [Human Resources \(HR\) policies and procedures - Policies | UWE Bristol](#) for further information.

Research with children or vulnerable adults must comply with UWE [Research Ethics Policy and Procedures](#). Appropriate DBS checks are required by researchers and guidance on this may be sought from the relevant Chair of Faculty Research Ethics Committees. Researchers and supervisors working on projects involving children and/or vulnerable adults must have undergone safeguarding training within the last two years.

Specific areas of University activity, for example admission of students, the governance of research, and the organisation of summer schools, have local safeguarding procedures.

It is expected that where safeguarding concerns arise within any partner setting eg. practice placement/apprenticeship employer, that the third party organisation should deal with the safeguarding matter within its own policy and procedures, involving external agencies as appropriate. Where a concern is that a University staff member or student poses a safeguarding risk, following the third party's investigation where the concerns are substantiated, it should then provide information to the University under this policy to enable appropriate disciplinary action to be taken. The University and partner agencies should ensure that reporting protocols are established in relation to dealing with safeguarding concerns where UWE staff or students are involved.

When a safeguarding concern occurs in relation to Future Quest, the school involved has primary responsibility and should be informed as soon as is practicable so it is able to implement its own safeguarding policy and procedure, liaising with external agencies as appropriate. If raised by a staff member or student of the University, they should also

inform the University at the earliest opportunity by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours.

Whilst apprentices are with the University for their study they fall under the University's Safeguarding Policy and Procedures. Where employers are in sectors where they have their own safeguarding policies, apprentices will be expected to be inducted into the workplace policies and procedures and to work within them.

Where a safeguarding related incident occurs in the employment setting, the setting involved should implement its own safeguarding policy and procedure, liaising with external agencies as appropriate. The setting should as part of its procedures inform the University's [Safeguarding Manager](#) immediately so any parallel action required can be taken by the University as appropriate. Employer induction and Apprentice Programme information should make this reporting route clear.

Where the University becomes aware of a safeguarding related issue or incident involving an apprentice, they will contact the Employer's Safeguarding Officer or equivalent. Where the employment setting does not have its own safeguarding policy and procedure, the employer will be sent a link to this Safeguarding Policy and this should be part of the employer induction. The University's commitment to safeguarding is embedded within its apprenticeship contracting with all parties and is monitored through a schedule of on and off-site reviews.

The University reserves the right to take action under its disciplinary procedures should it later receive information that suggests that staff members' or students' conduct present safeguarding concerns. Following due process, the University may be required to report staff or students who are considered to pose a safeguarding risk to external regulatory and professional bodies such as the Disclosure and Barring Service.

Support from internal or external services will be provided as appropriate for staff or students impacted by safeguarding issues.

## **Responsibilities**

The Dean of students has been appointed to act as the University's Principal Designated Safeguarding Officer. They will act as a conduit to the Pro Vice Chancellor (Student Experience, the University Directorate and Board of Governors for the University).

The Director of Human Resources and the Safeguarding Manager in Student and Academic Services are the University's Designated Safeguarding Officers respectively for staff and students.

Their responsibilities, or their nominees, include:

- Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date;
- Acting as a source of support, advice and expertise to staff on matters of safeguarding
- Acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
- Acting upon concerns as appropriate in the circumstances for example by making external referrals to local authorities or police;

## **Monitoring and evaluation**

The Safeguarding Manager will record any incidents relating to safeguarding concerns and will report them annually in an anonymised form to the Safeguarding Steering Group before being presented to the Board of Governors.

# Safeguarding Policy 2

## The Prevent Duty and safeguarding people from being drawn into terrorism

This policy sets out the University's (UWE Bristol's) approach to safeguarding people at risk of radicalisation.

- For concerns about children and vulnerable adults, please go to Safeguarding Policy 1 – Safeguarding Under 18s and Vulnerable Adults (page 3)
- For concerns about students or staff who are out of scope of this policy, including risks of abuse from others and from self such as self-harming and suicide, please go to Safeguarding Policy 3 – Welfare Concerns (page 20)

**Call 999 if there is an immediate risk of serious harm.** It is important to note that Prevent applies only where no crime has yet been committed. If a criminal act has already occurred, this should be reported to the police via 999 or 101 as appropriate.

Non-urgent advice is available by contacting the [Safeguarding Manager](#) directly.

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## Definitions

- **Student:** this includes home (UK), European Union (EU), offshore or international students, enrolled on any UWE programme of study and includes individuals who sit outside of the traditional scope of engagement with University activities, or where the University represents a singular component of a multi-provider programme (i.e. apprentices).
- **Prevent:** the anti-radicalisation agenda embedded in the Counter Terrorism Act.
- **Academic freedom:** the expectation that staff and students shall have freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.
- **Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Individual vulnerable to radicalisation:** this differs from the definition of 'vulnerable adult' and may refer to any individual unrelated to any care and support needs. Vulnerability is a situation where a person is at increased risk of exploitation, harm or abuse. Certain individual factors are understood to make people more vulnerable to radicalisation. These can include but are not limited to; experience of trauma; social isolation; idealism, a need for identity and belonging; a sense of grievance and injustice; friends or family involvement in extremism; a desire for status, control, adventure.
- **Ideology:** a set of beliefs or principles, especially one on which a political or religious system, party, or organisation is based
- **Extremism:** where views are held that are intolerant of people who are of a different ethnicity, culture, religion, gender or political or sexual identity, and therefore go against the principles of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs on which Britain's society is based. Extremists may try to force their views on others and in some cases, may believe that these views can justify the use of violence in order to achieve certain aims.
- **Non-Violent Extremism:** is extremism, as defined above, which is not accompanied by violence.
- **Violent extremism:** includes violence, incitement to violence, terrorism, incitement to terrorism or other activities that may result in violent behaviour or terrorist activities in the name of an ideology or a set of beliefs.
- **Terrorism:** an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

## Scope

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 visitors or contractors engaged by the University.

For the purposes of this policy this includes the Students' Union. The University and the Students' Union are committed to working together and sharing information in order to safeguard the interests and wellbeing of everyone in the University community. The Halley Nursery, run by the Students' Union, and UWE Bristol International College have their own Prevent policies and procedures and are therefore out of scope of this Policy and Procedure.

## Aims and objectives

The University is committed to protecting students and staff from being drawn into terrorism and to ensuring that all staff and students are aware of their responsibilities in relation to the Prevent Duty and know how to respond to concerns.

The University will remain mindful of its duty of care and other legal obligations, such as those under the Health and Safety at Work Act 1974, the General Data Protection Regulation (GDPR), the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

This policy sets out how the University will deal with concerns that are raised that an individual may be at risk of being drawn into terrorism, and the type of action that UWE may take to manage such matters and provide support.

## Key principles

Section 26 of the [Counter-Terrorism and Security Act 2015](#) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". UWE Bristol is subject to the Duty as it is a specified authority under Section 11 of the [Higher Education Act 2004](#).

The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Higher Education Institutions' compliance is monitored by the Office for Students (OfS) and ) and where appropriate, Ofsted (i.e. apprenticeships at up to Level 5).

The University accepts the obligations arising from the Prevent legislation as an important element of its general duty of care to protect its staff and students from all forms of harm. The University recognises that radicalisation and extremism can put individuals at risk of being drawn into violence and criminal activity and has the potential to cause significant harm to them. Working to prevent individuals from being drawn into terrorism is an act of safeguarding.

The University is committed both to protecting freedom of speech and academic freedom and to protecting and safeguarding its students from the risk of being drawn into terrorism. The Prevent Duty will be discharged in a way that continues to encourage the exploration of political, philosophical and religious ideas and beliefs.

This policy is not directed at any specific ideology, religion, or any other set of beliefs. This policy does not allow for any individual or group of individuals to be marginalised, stigmatised or excluded from the learning and research community.

Concerns raised may be around individual vulnerability as well as evidence of extremist activity on-campus or in local areas, such as propaganda materials, flyers and stickers.

Where Prevent concerns are raised about a person who is responsible for a child or vulnerable adults and the concerns raised may indicate a risk to the safety of the child or vulnerable adult, this should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours as per **Safeguarding Policy 1 – Safeguarding Under 18s and Vulnerable Adults**.

Staff dealing with Prevent concerns should never promise confidentiality as information may need to be shared.

As with all safeguarding, effective Prevent work depends on effective partnership and information sharing. Anyone can witness or become aware of information suggesting that someone is at risk of being drawn into terrorism and it mustn't be assumed that someone else will share the information. It isn't everyone's responsibility to investigate concerns but it is everyone's responsibility to share concerns appropriately. Early sharing of information is key to providing an effective response to concerns.

## Processing of information

The University is committed to complying with the requirements of data protection legislation and regulations and any personal data created as part of this policy will be

processed in accordance with the University's procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

## **Reporting Prevent related concerns within UWE Bristol**

If a student or staff member believes that there is an immediate risk of significant harm or that a crime has already been committed they should call the police on 999. If a direct referral is made to the police, the member of staff or student should inform the University at the earliest opportunity by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours.

Non-urgent Prevent related concerns involving staff members, including in cases where they are also a student at the University, should be reported by emailing [UWE Bristol Human Resources](#) to request a time to discuss the concerns in more detail, without inclusion of identifying information. Concerns raised regarding staff will be assessed in order to form a view on whether there is sufficient information to suggest that an incident has occurred or is at risk of occurring, such that onward referral is necessary. If there appear to be safeguarding risks then the information will be shared with the Safeguarding Manager or their nominees for further assessment.

Concerns raised regarding staff will be assessed in order to form a view on whether the individual is at risk of being radicalised, or whether there are other wellbeing factors to consider. If the risk is not deemed to be related to extremism or terrorism, alternative University support processes will be offered. If there appear to be Prevent related risks then the information will be shared with the Safeguarding Manager or their nominees for further assessment.

All other non-urgent Prevent related concerns should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours, or online via [Report and Support](#).

Concerns raised regarding students will be assessed by the Safeguarding Manager or their nominees in order to form a view on whether the individual is at risk of being radicalised, or whether there are other wellbeing factors to consider. Concerns are screened at this stage to avoid inappropriate onward referral. If the risk is not deemed to be related to extremism or terrorism, alternative University support processes will be offered as appropriate.

As part of the assessment of concerns raised, the Safeguarding Manager or their nominees may seek external advice from expert partners without identifying the individual. If following



assessment of the concerns raised, it is found that there is a risk with regard to terrorism or extremism, the individual will be spoken to, and if Prevent related concerns remain, their consent would normally be sought to refer to external agencies. If there is an immediate threat or risk to self or others, consent will not be sought. Again, if there is found to be no risk with regard to terrorism or extremism, if appropriate the individual will be referred via alternative University support processes.

Where possible, any external referrals will be made with the consent and knowledge of those involved. The University may be required to report to external bodies and reserves the right to refer without consent where there is a serious risk, evidence or suspicion of a serious risk of harm or disclosure is in the public interest. Prevent referrals will be proportionate and made on the basis of identified and considered risk, including consideration of the impact of the referral.

## **Associated processes within UWE Bristol**

As part of the Prevent Duty, Government guidance stipulates that the University must have clear policies and procedures for students and staff working on sensitive or extremism-related research or where data gathered and stored could be misused for the purposes of terrorism. The University has a well-established ethics policy and approval processes in relation to research and this includes [guidance](#) on conducting security sensitive research. The University will hold a register of all applications for ethical approval considered by the **University Research Ethics Committee** to amount to security sensitive research. Any identifying information from the register will never be shared routinely and would not be shared unless there has been a statutory request. The University recognises that research is an essential part of effective counter terrorism and encourages responsible research in this area.

As part of the Prevent Duty, Higher Education Institutions must ensure they have proper risk assessment processes for external speakers and ensure that those espousing 'extremist views' do not go unchallenged. The University is committed to the protection of freedom of speech and academic freedom, alongside a duty of care for the welfare of our staff, students and visitors. The University's [External Speaker Policy](#) provides a governing framework for events with external speakers to ensure that debate, challenge and dissent are not only permitted but expected, while safeguarding our institution and its staff and students. The Office for Students (OfS) requires an annual statutory report detailing the number of speakers hosted and the number of documented risk assessments referred to the Prevent lead. This report is does not include any personal data. Where appropriate, this data can also be shared with other governance agencies (i.e. Ofsted)

The University's IT policies outline the responsibilities and required behaviours of all University users of any information systems. In line with e-safety agendas, it is strictly prohibited that the University's website, IT facilities or other elements of the University's information management systems are used for the promotion, planning or execution of violent extremism/radicalisation.

The University reserves the right to take action under its disciplinary procedures should it later receive information that suggests misconduct by staff members or students or where their conduct presents safeguarding concerns. Following due process, the University may be required to report staff or students who are considered to pose a safeguarding risk to external regulatory and professional bodies such as the Disclosure and Barring Service.

## **Associated processes**

In a placement or work based learning environment (such as a professional, clinical setting or apprenticeship setting) a member of staff or student should normally report any Prevent related concern in the first instance to the responsible officer of the provider, or employer. If the student or staff member feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer or equivalent, or they do not feel they have had a satisfactory response, they should refer directly to the University Safeguarding Manager.

It is expected that where Prevent concerns arise within any partner setting eg. practice placement/apprenticeship employer, that the third party organisation should deal with the safeguarding matter within its own policy and procedures, involving external agencies as appropriate. The University and partner agencies should ensure that reporting protocols are established in relation to dealing with Prevent concerns where UWE staff or students are involved.

Where a Prevent related concern occurs in relation to Future Quest, the school involved has primary responsibility and should be informed as soon as is practicable so it is able to implement its own safeguarding policy and procedure, liaising with external agencies as appropriate. If raised by a staff member or student of the University, they should also inform the University of their action at the earliest opportunity by Non-urgent safeguarding concerns should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours.

## **Responsibilities**

Responsibility for ensuring compliance with the legal duty sits with the governing body.

The Pro Vice Chancellor (Student Experience) has been appointed to act as the University's Principal Prevent Lead.

The Safeguarding Manager acts as the operational Prevent Lead.

Their responsibilities, or their nominees, include:

- Undertaking relevant training in the Prevent Duty and ensuring their knowledge is kept up to date;
- Being a member of the Bristol Prevent Partnership Board, 'Building the Bridge' and to actively engage with the Board to ensure that the University benefits from local best practice and formal intelligence, and to support the work of the Board;
- Ensuring relevant staff are identified and provided with appropriate training; and in partnership with the HR Department, ensuring that a formal record is kept of those that participate in such training
- Acting as a source of support, advice and expertise to staff on matters relating to the Prevent Duty
- Acting as a point of contact for those who have concerns, receiving information and recording those concerns;
- Acting upon concerns as appropriate in the circumstances for example by making external referrals to local authorities or police;
- Submitting an accountability and data return to the Office for Students (OfS).

## **Monitoring and evaluation**

The Safeguarding Manager will record any incidents relating to Prevent concerns and will report them annually in an anonymised form to the Safeguarding Steering Group before being presented to the Board of Governors.

The Office for Students (OfS) as the monitoring body for the Prevent duty requires a statutory annual statistical report on data such as numbers of concerns that have been escalated to the University Prevent lead. No personal and identifying data is included within this report.

# Safeguarding Policy 3

## Welfare Concerns

This policy sets out the University's (UWE Bristol's) approach to responding to serious concerns raised about the safety and wellbeing of a student.

For concerns about children and vulnerable adults, please go to Safeguarding Policy 1 – Safeguarding Under 18s and Vulnerable Adults (page 3)

For concerns about risk of radicalisation, please go to Safeguarding Policy 2 – The Prevent Duty and safeguarding people at risk of being drawn into terrorism (page 12)

### **Call 999 if there is an immediate risk of serious harm**

Non-urgent advice is available by contacting the [Safeguarding Manager](#) directly.

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## Definitions

- **Student:** this includes home (UK), European Union (EU), offshore or international students, enrolled on any UWE programme of study and includes individuals who sit outside of the traditional scope of engagement with University activities, or where the University represents a singular component of a multi-provider programme (i.e. apprentices).
- **Welfare concern:** Any situation where the safety, physical or mental health of a person or people is at serious risk, or creates a risk to the safety and wellbeing of those around

them. This could include but is not limited to; risk of suicide, significant treated/untreated mental health difficulties, self-harming behavior, where someone may have gone missing, risks from others (such as in cases of domestic violence, sexual violence, stalking, involvement in crime), high risk alcohol and other drug use, exploitation by others, serious self-neglect, risk of homelessness.

## Scope

This Policy and the associated procedure apply to all University activities, undertaken at any University campus in the UK. This Policy applies to all students of the University, and to anyone inside and outside of the University who may have serious concerns for them. For the purposes of this policy this includes the Students' Union. The University and the Students' Union are committed to working together and sharing information in order to safeguard the interests and wellbeing of children and vulnerable adults, e.g. in relation to individuals and activities with student societies and volunteering. The Halley Nursery, run by the Students' Union, and UWE Bristol International College have their own child protection policies and procedures and are therefore out of scope of this Policy and Procedure.

## Aims and objectives

The University is committed to the welfare of its students and remains mindful of its duty of care to take reasonable steps to prevent harm occurring, where that harm is within its reasonable control and its other legal obligations, such as those under the Health and Safety at Work Act 1974, the General Data Protection Regulation (GDPR), the Safeguarding Adults at risk 2019, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

This policy sets out how the University will deal with concerns that are raised regarding risks to the welfare and safety of an individual, and the type of action that the University may take to manage such matters and provide support.

## Key principles

The University recognises that within its diverse student population there may be members who become vulnerable at any given time. The University and its staff have a collective and individual duty of care to support and safeguard the welfare of vulnerable students.

The University's response to concerns will be supportive and will take account of the wellbeing of all of those involved. Students or staff who are affected by welfare concerns will be offered support from within the University or signposting to support externally. All

staff will be made aware of this policy and procedure and related guidance. Support will be available for any enduring impact of the exposure to the concern.

Where welfare concerns are raised, consideration should also be given to whether they have caring responsibility for a child or vulnerable adult. Where this leads to concerns indicating a possible risk to the safety of the child or vulnerable adult, as per **Safeguarding Policy 1 – Safeguarding Under 18s and Vulnerable Adults**, these should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours, or online via [Report and Support](#).

The University is an adult environment. Adults with capacity have the right to self determination and this includes the right to make unwise decisions and to control information about themselves. Adults may choose to put themselves at risk. They may choose not to engage with support available.

The University will respect confidentiality and the privacy of its students in accordance with data protection legislation as much as possible. Parents, family members and friends of students have no general legal right to be given information about those individuals, including confirmation of whether or not a student is registered with the University. The University can share general information about University policies and procedures with a concerned person but cannot share any information specific to the individual student, unless the student has given their consent for this. The University may pass requests on to students to contact concerned people, ask the student for their consent to share information, carry out welfare checks where the student lives in UWE Bristol accommodation or contact the student to offer support.

Where concerns are deemed to be sufficiently great that the situation is critical or an emergency, the University with agreement of a senior manager may decide to share information with the emergency contact of the student concerned.

Although privacy of reporters and other involved parties will be protected as much as possible, confidentiality cannot be guaranteed. There may be circumstances where as part of due process a reporter's identity, where known by the University, may need to be shared with the student.

There may be circumstances where in order to protect a student's welfare, the University will need to disclose certain information to third parties on a 'need to know' basis. Such third parties may include local agencies (as appropriate) such as health services, local authorities and the Police. Where possible, information will be shared with the person's consent but the University reserves the right to refer without consent. Confidential information will only be

shared with the agreement of an appropriate senior manager. Staff dealing with welfare concerns should never promise confidentiality as information may need to be shared. Referrals to third parties will be proportionate and made on the basis of identified and considered risk, including consideration of the impact of the referral.

Effective safeguarding depends on effective partnership and information sharing. Anyone can witness or become aware of information suggesting that someone is at risk and it mustn't be assumed that someone else will share the information. It isn't everyone's responsibility to investigate concerns but it is everyone's responsibility to share concerns appropriately. Early sharing of information is key to providing an effective response to concerns.

## **Processing of information**

The University is committed to complying with the requirements of data protection legislation and regulations and any personal data created as part of this policy will be processed in accordance with the University's procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

## **Reporting welfare concerns to UWE Bristol**

Welfare concerns should be reported by calling the UWE Bristol Serious Concerns line on +44 (0)7788 725507 during office hours (8.30 – 5 Mon-Thurs and 8.30-4.30 Fridays), or +44 (0)7814 791212 out of hours, or online via [Report and Support](#). This service will be able to receive confidential information but will not be able to share any information already held, including confirming whether or not the person has any association with the University. The service's usual response will be to carry out further investigation in order to assess the situation and decide on further actions. The service cannot provide an immediate response in person or commit to updating the reporter on actions taken.

The University Security Service can provide an immediate on-campus response and assist in contacting the emergency services where necessary. They operate 24 hours a day, 365 days of the year. They can be contacted on +44 (0)117 328 9999 or internal: 9999.

Non-urgent advice is available by contacting the [Safeguarding Manager](#) directly.

## **Associated processes within UWE Bristol**

There may be circumstances where a student's physical or mental health may mean that they pose a risk to themselves, to other students or to the activities of the University and

risk management may need to be coordinated across the University. Those cases may be managed through the [Fitness to Study Policy principles - Policies | UWE Bristol](#)

There may be circumstances where welfare concerns are raised about a student who is on a program of study which usually leads to professional registration and/or a license to practice in a professional context. Where the welfare concerns indicate a lack of insight and inappropriate management thereof, which gives rise to concerns about possible risk to self or others, those cases may be managed under the [Professional Suitability Policy](#).

### **Associated processes outside UWE Bristol**

Non-emergency report routes outside of UWE Bristol processes include the GP of the individual concerned, the NHS on 111 or the Police by calling 101.



## **Review of policy and procedure**

The Safeguarding Steering Group is responsible for overseeing and updating this policy and procedure particularly with respect to the legal obligations and other external requirements. This policy and procedure will be formally reviewed every three years unless there are internal or legislative changes that necessitates earlier review.

## **Further assistance**

Further information on this policy and procedure is available from:  
[The Safeguarding Manager](#)