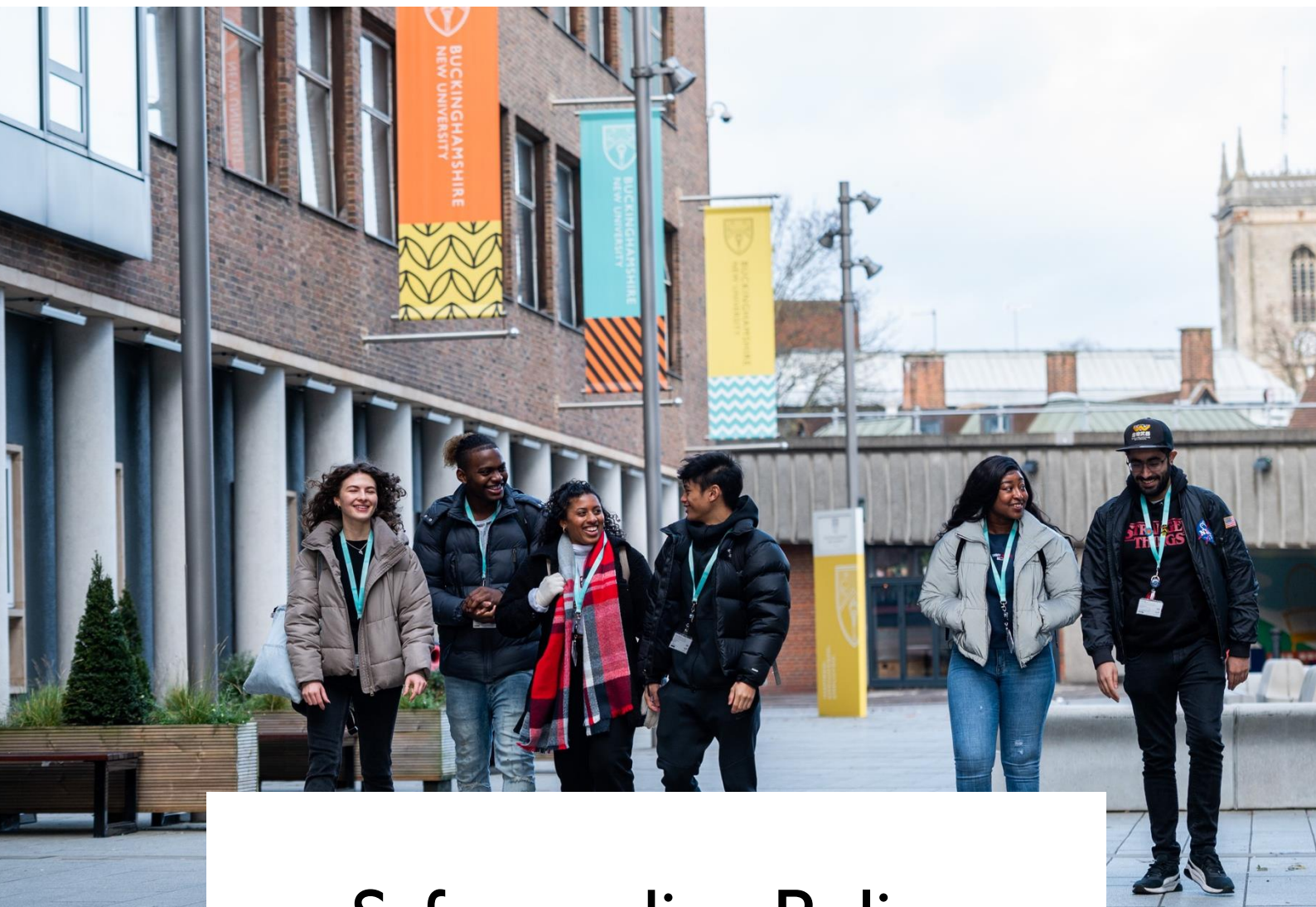




BUCKINGHAMSHIRE  
NEW UNIVERSITY

EST. 1891



# Safeguarding Policy



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## Purpose

- 1 Safeguarding encompasses measures aimed at ensuring the health, well-being, and rights of individuals. Its core objective is to create a life free from abuse, harm, and neglect, particularly for children, young people, and vulnerable adults. The term 'safeguarding' encompasses various areas of potential concern relating to child protection, radicalisation, physical abuse or neglect, emotional abuse or neglect, abuse of power, and (sexual) exploitation.
- 2 For the purposes of this policy, an 'adult at risk' refers to an individual who requires care and support, experiencing or at risk of abuse or neglect due to their care needs, rendering them unable to protect themselves. According to the Care Act 2014, such individuals face vulnerabilities that necessitate safeguarding measures for their well-being and protection.
- 3 Similarly, a 'child at risk' as defined by the Children Act 2009/2014 refers to an individual under the age of 18 who requires protection or support due to significant harm or the risk thereof, encompassing physical, emotional, sexual, or neglect-related harm.
- 4 Both children and adults at risk are prioritised under our policy, aiming to ensure their safeguarding against abuse, harm, neglect, and exploitation and welfare.
- 5 The Safeguarding Policy at Buckinghamshire New University (BNU) serves to define and establish the University's commitment to cultivating a safe and positive environment for our entire community. BNU is dedicated to protecting all members, including children and adults at risk, from any form of abuse, harm, discrimination, exploitation and/or neglect.
- 6 Our policy prioritises individuals who may face heightened vulnerability or adversity, ensuring that their safety and well-being receive utmost attention. We strive to provide equal access to protection and support for these individuals, recognising the potential challenges they may encounter due to weakened safeguards and coping strategies. By safeguarding all members of the University community, including children and adults at risk, BNU aims to create an environment free from abuse, harm, discrimination, and exploitation.
- 7 The policy does not seek to restrict or reduce freedom of speech. Please consult BNU's [Freedom of Speech Policy and Procedures](#) for more information.
- 8 The policy outlines a clear and systematic approach to safeguarding, detailing our procedures for preventing harm, and for identifying and responding to safeguarding concerns. This policy is informed by a range of legislation, including the [Health and Safety at Work Act 1974](#); the [Data Protection Act 2018](#); safeguarding legislation and requirements such as the [Safeguarding Vulnerable Groups Act 2006](#), the [Children Act 2004](#), the [Care Act 2014](#) and [Keeping Children Safe in Education 2022](#); the [Equality Act 2010](#), and the [Counter Terrorism and Security Act 2015](#).
- 9 The guiding principles of this policy are:
  - **Safety:** We prioritise the safety and welfare of our university community above all else
  - **Respect:** We value and respect every individual, recognising the diversity of our university community

- **Inclusion:** We are committed to fostering an inclusive environment where everyone feels respected and able to participate fully
  - **Responsibility:** We recognise our responsibility and are committed to upholding this in all aspects of our work.
- 10 The University recognises that it has a duty to anticipate, mitigate, and address safeguarding issues. This includes reporting safeguarding concerns relating to a child or vulnerable adult to appropriate external organisations, regardless of whether the individual is a member of the University community.
- 11 The key aims of this Safeguarding Policy are to:
- Highlight the importance of safeguarding within our University community, embedding it into our practices and culture
  - Provide clear guidance on reporting and managing safeguarding concerns
  - Ensure that all members of the University community understand their roles and responsibilities in relation to safeguarding
  - Create an environment in which everyone feels safe, supported, and able to study and work to the best of their abilities.
- 12 This policy provides a foundation for our work in safeguarding. It should be read in conjunction with other related policies and guidance, and forms part of our wider commitment to equality, diversity, and inclusion.

## Applicability and Scope

- 13 This policy relates to any individual who is part of or interacts with our University community, either directly or indirectly. This includes anyone who may be at risk of harm, exploitation and/or discrimination, as well as those who are responsible for or may witness such risk.
- 14 Our safeguarding policy is mandatory for all learners and staff within our University community, without exception. This encompasses:
- Full-time and part-time learners
  - Apprenticeship learners
  - Academic and professional services staff.
- 15 We expect our partners, external organisations, and anyone who engages with BNU in any capacity, to be familiar with this policy and to adopt it or to align their own Safeguarding Policy with it. This includes:
- Apprenticeship providers and subcontractors
  - Practice learning partners
  - Contractors and service providers

- Volunteers and visitors (including guest speakers and external event organisers)
- Partner institutions and organisations.

16 We encourage all these parties to reference this safeguarding policy in the development and implementation of their own policies to ensure a comprehensive, consistent approach to safeguarding across our community.

## **Which Scenarios are Covered by the Policy?**

17 This policy covers a wide range of situations, such as:

- Behaviour on campus, including in student residences and other properties owned by the University
- Conduct during off-campus University events, field trips, and placements
- Online activities related to University life or impacting members of our University community
- Issues arising within organisations partnered with the University or during interactions with apprenticeship providers.
- Personal situations or incidents in a student's private life or home that might pose a risk to the individual or others or affect the University community in any way.

Further examples of safeguarding concerns can be found in [Appendix 4](#).

## **When the Policy May Not Directly Apply**

18 While this policy is broad in its scope, there could be instances where activities or incidents might not fall directly under the University's jurisdiction. This could include personal activities of learners or staff that are not connected to the University and are outside the University's control or influence.

19 If these activities raise any safeguarding concerns, they might still be considered under this or another appropriate University policy. Specifically, if a student causes harm in their personal life, the University might take necessary action according to its policies to ensure the safety and wellbeing of the University community.

## **Safeguarding Learners Undertaking Regulated/Professional Courses**

20 For learners enrolled in regulated or professional courses at our University, who are or will be working with the public, an additional safeguarding consideration is necessary. This pertains to learners who may have ongoing safeguarding issues in their families, particularly related to child protection and adult protection referrals or cases.

21 In such instances, we recognise the importance of conducting a transfer of risk assessment to ensure the safety and well-being of all parties involved. The assessment will be carried out with the involvement of the Local Authority Designated Officer (LADO) as appropriate.

22 Our commitment to safeguarding extends not only to those within our University community but also to the broader public with whom our learners will engage during their professional endeavours. By addressing these specific safeguarding issues and conducting thorough risk

assessments, we aim to create a secure learning environment that fosters responsible and ethical practices in all fields of study.

## **International Student Safeguarding Guidelines**

- 23 Understanding the unique circumstances of our international learners, we've established guidelines to navigate safeguarding issues with respect to their visa conditions under the UK Visa and Immigration (UKVI) regulations.
- If safeguarding issues impact regular attendance or necessitate a study break, learners should promptly consult the International Compliance Team. This is crucial as changes in enrolment or study progression may affect the student's visa status
  - The International Compliance Team will offer advice and liaise with UKVI if necessary
  - All learners, irrespective of nationality or visa status, are subject to the same safeguards for their wellbeing
  - Concerns about safeguarding issues affecting study or visa status should be directed to the International Compliance Team or the Safeguarding Team.

## **Prevent Policy**

- 24 Within this scope, we also recognise and underscore the relevance of the government's Prevent Duty. This strategy is dedicated to preventing individuals from becoming involved in terrorism or supporting terrorism and radicalisation.
- 25 While the principles of the Prevent strategy are interwoven within our broader safeguarding measures (further details can be found in [Appendix 5: Understanding the Prevent Strategy](#)), specific guidelines, procedures, and responsibilities about the implementation of Prevent are outlined separately.
- 26 These details are encompassed within the University's Prevent Policy. All members of our community are urged to familiarise themselves with this policy.
- 27 The Prevent Policy provides a comprehensive understanding of how we aim to maintain the safety and wellbeing of our community members, protecting them from risks associated with radicalisation and extremism.

## **Reporting a Safeguarding Concern**

- 28 If you have a safeguarding concern, there are several ways you can report it to ensure the safety and wellbeing of everyone involved.
- Use the Report and Support Tool: Our online tool is available for you to report any safeguarding issues. This tool allows for anonymity, and the concerns raised will be addressed promptly and professionally.

- Email: You can send an email to [safeguarding@bnu.ac.uk](mailto:safeguarding@bnu.ac.uk) detailing the nature of your concern. The email will be received by our dedicated safeguarding team who will take appropriate actions.
  - Speak to a University Representative: If you would prefer to report your concern verbally, you can speak to any member of the University staff. They will assist you in raising the issue with the safeguarding team.
- 29 Remember, your report could make a significant difference to someone's safety and wellbeing. Don't hesitate to report any concerns you may have.
- 30 Further guidance can be found in [Appendix 2: Safeguarding Procedure](#) with more detailed guidance for specific safeguarding concerns in [Appendix 3](#)

## Proactive Steps

### Staff Recruitment

- 31 At BNU, we strive to recruit the best professionals who share our commitment to safeguarding. Our recruitment procedures are robust and designed to discourage and identify individuals unsuited to work with children and adults at risk, or those who may pose a risk regarding violence, sexual misconduct, harassment, or hate crime.
- 32 All prospective staff are thoroughly screened, and relevant posts require a satisfactory Disclosure and Barring Service (DBS) disclosure as part of the vetting process. In order to ensure it fulfils its duties, BNU will appoint a senior manager as the Designated Safeguarding Lead (DSL). The University will also appoint Safeguarding Officers that are trained in relevant safeguarding procedures.

### Student Recruitment

- 33 Safeguarding our learners is of utmost importance. Our Directorate teams manage their safeguarding procedures, ensuring they are consistent with the overarching BNU Safeguarding Policy.
- 34 For certain programmes like Social Work, Nursing, Midwifery, Physicians Associate and Allied health professionals must obtain a satisfactory enhanced DBS disclosure as part of their application process. This requirement will also sit alongside the is necessary to protect the learners as well as the communities they will serve during their studies in alignment with the [Fitness to Practise Procedure](#).

### Apprenticeships

- 35 Apprentices must feel and be safe. Therefore, we have implemented strict safeguarding procedures that ensure the safety and wellbeing of our apprentices. These safeguards extend to the workplaces where our apprentices are placed. All university staff involved in the organisation, management or delivery of apprenticeships must complete mandatory safeguarding training.

## **Apprenticeship Providers and Subcontractors**

- 36 Trust and adherence to safeguarding practices are the foundation of our relationships with apprenticeship providers. We expect all providers to demonstrate a strong commitment to safeguarding all learners. They must have robust policies and procedures to protect apprentices from harm, be it physical, emotional, or any other form. We maintain frequent communication and conduct regular checks with our providers to ensure these safeguarding measures are consistently followed and effective.
- 37 While this policy fully applies to apprentices, apprenticeship providers, and subcontractors there is also further guidance on supporting apprentices available in [Appendix 6: Supporting and Safeguarding Apprentices](#).

## **Learners Under 18**

- 38 We recognise the unique needs of our learners under 18 years old. Additional safeguards have been instituted specifically for these learners. Staff members who have one-to-one interactions with these younger learners are subject to appropriate selection and training procedures. Key details of under eighteen learners are carefully shared with relevant Directorates/Schools, in line with data protection regulations, to facilitate their safety and wellbeing.

## **Student Placements**

- 39 Courses that include a compulsory placement component with access to children or adults at risk have developed detailed procedures and guidelines. In a placement or professional work experience setting, a member of staff or student should normally report any safeguarding concern to the organisation's DSL or safeguarding lead/team, as per the employer's policy. If this is inappropriate, or if there is no response from the organisation, the safeguarding concern may also be reported to the University as per the procedures in this policy.
- 40 These guidelines, consistent with our Safeguarding Policy, include comprehensive, course-specific action plans to ensure the safety of our learners and the people they interact with during placements. See [Guidance for the Placement of University Students](#) for more information.

## **Student Employment**

- 41 Students employed by the University go through the same rigorous recruitment procedures as our staff, especially when their roles involve contact with children or adults at risk. We assess potential risks associated with violence against women, sexual misconduct, harassment, or hate crime, and DBS checks are obtained as needed. We believe that every individual in our institution deserves a safe work environment.
- 42 Additional details regarding our approach to Disclosure and Barring Service (DBS) checks can be found in our [DBS policy](#).

## **Widening Participation**

- 43 Our Widening Participation activities, such as outreach to local schools and organising summer schools on campus, are carried out under strict safeguarding measures. All staff and students involved in these initiatives receive training and resources to ensure the safety and wellbeing of everyone involved.



- 44 Staff and students should be aware of any local safeguarding policies and procedures; however they can report any concerns where they feel is most appropriate or safe for them to do.

## **Physical Environment**

- 45 Ensuring the safety of our physical environment is paramount for the wellbeing and productivity of our learners and staff. This not only includes the provision of a secure campus and workplace but also encompasses several other safety considerations such as the management of facilities, controlled access, visitor regulations, and specific safeguards for various situations including lone working.
- 46 It is crucial that these environments adhere to high safety standards, with maintained facilities, controlled access, and proper visitor management. Regular audits and risk assessments are performed to mitigate potential risks. In the case of lone working, clear guidelines are established to ensure learners' safety. For detailed health and safety information, please refer to the specific policies in place.

## **Contractors**

- 47 The engagement of contractors and other external service providers is governed by our stringent procurement and tendering procedures. We ensure that these contractors and service providers align with our safeguarding principles and adhere to the University's policies.

## **Sub-Contractors**

- 48 All subcontractors are required to provide a copy of their safeguarding policy. This should include detailed information about their procedures and strategies to ensure the safety and welfare of all individuals within their care. It is essential that subcontractors also share the contact details of their safeguarding lead, along with any other key personnel responsible for implementing and maintaining these policies.

## **External Events**

- 49 External events hosted by the University, such as lectures, workshops, and performances, are carried out with meticulous planning and consideration for safeguarding. Organisers carry out comprehensive risk assessments for each event, identifying and addressing potential risks and should adhere to the Freedom of Speech Policy and Procedures when bringing in external speakers.

## **Public Use of University Facilities**

- 50 When members of the public, including under 18s and adults at risk, use our facilities, we require them to adhere to our safeguarding policy. It is also essential for them to provide information on their own safeguarding measures for their attendees. We ensure that our commitment to a safe and inclusive environment extends to all visitors, no matter the purpose or duration of their visit.

## **Whistleblowing and Safeguarding**

- 51 Safeguarding and whistleblowing are two distinct concepts, although there may be times where these intersect. Safeguarding refers to measures taken to prevent and protect against harm due to abuse and/or neglect, and to ensure the health, well-being, and human rights of individuals.

Whistleblowing, on the other hand, is the reporting of illegal, unethical, or improper conduct by internal members of an organisation.

- 52 It is important to recognise that while they are distinct, there can be overlap. In some circumstances, concerns about the welfare of a child or adult at risk may also constitute a whistleblowing concern. For example, if the suspected abuse or harm is being perpetrated by a member of staff or is a result of organisational practices.
- 53 In such cases, both the [Safeguarding and Whistleblowing \(Raising Concerns\) policies](#) should be consulted to ensure the correct procedures are followed. Remember, the safety and wellbeing of individuals are paramount. Always prioritise reporting concerns to ensure those at risk are protected. Any concerns should be reported where action is believed to be necessary.

## Emergency Contacts

- 54 At BNU, we ask all students to provide an emergency contact at registration. This person does not have to be a parent or guardian but should be someone the student can rely on in times of need.
- 55 Each academic year starts with an opportunity for students to update their emergency contact details. Moreover, students can make changes to this information at any time during the year.
- 56 We aim to respect students' privacy, preferring to contact their trusted person only with their permission. However, if serious safety or mental health concerns arise, our trained staff may decide to involve trusted contacts, even without the student's agreement.
- 57 These decisions are based on risk assessments and are always recorded to ensure transparency and accountability.

## Confidentiality

- 58 At BNU, we value and respect the confidentiality of all individuals within our community. BNU complies with confidentiality within safeguarding by using these key principles:
- **Principle of Confidentiality:** Any information related to safeguarding concerns will be kept confidential and will only be shared with those who need to know to ensure safety and to take appropriate action.
  - **Limits to Confidentiality:** Confidentiality is not absolute when it comes to safeguarding. While seeking and obtaining consent is best practice, there are instances where, unless it would increase the risk to the individual, it is important to inform the person or, if they are under 18 years old, the individual with parental responsibility, about the sharing of information or the referral being made.  
If we believe that someone, particularly a child or an adult at risk, is in immediate danger or at risk of harm, it may be necessary to share information with relevant authorities even

without the person's consent. This is both in accordance with the law and our responsibility to protect the well-being and safety of our community members.

- **Data Protection:** We adhere to data protection laws when handling personal information relating to safeguarding concerns. Personal data will be stored securely, used responsibly, and only kept for as long as necessary.
- **Support and Advice:** When someone shares a safeguarding concern with us, we will explain how we will use and who might see their information. We also reassure them that their welfare is our primary concern, and they will be supported throughout the process.
- **Anonymous Reporting:** We understand that sometimes people prefer to report concerns anonymously. While we respect this choice, it can make it more challenging for us to act or provide individual support.

59 In most cases, specific outcomes will not be shared with the reporter. This practice maintains the dignity and confidentiality of all parties involved, aligns with data protection legislation, and emphasises that safeguarding is everyone's responsibility.

## Support

### Learners

60 At BNU, our priority is the welfare and wellbeing of our learners. We understand that involvement in a safeguarding issue, whether as the person raising the concern or the person about whom a concern has been raised, can be challenging. We have measures in place to provide assistance:

- **Support for Learners Raising a Safeguarding Issue:** When a student reports a safeguarding issue, they will be assisted throughout the process by trained staff members. Additional support, such as counselling or advice services, is available if needed.
- **Support for Learners Who Are the Subject of a Safeguarding Issue:** If a safeguarding concern is raised regarding a student, BNU provides support to them as well. A supportive and non-judgemental environment is established where the student can discuss their situation and concerns with trained staff. Access to support services like counselling and advice services is also offered to help them through this period.
- **Fairness and Respect:** At BNU, we are deeply committed to upholding the principles of natural justice during any safeguarding process. We ensure that all learners involved are treated with utmost fairness and respect. This includes providing each party with the opportunity to express their views and be heard, fostering an environment of transparency and openness in our proceedings. We believe that every individual deserves a fair and unbiased evaluation, and we strive to maintain these principles at the core of our safeguarding practices.

61 In the event of raising a concern or when a concern has been raised about a student, BNU will provide support and guidance, maintaining the dignity and privacy of the individual throughout the process.

## **Students' Union**

62 [The Students' Union \(SU\) Advice Centre](#) at BNU provides essential support to students, including instances related to safeguarding. Offering professional, confidential, and empathetic guidance, they can assist navigating through any safeguarding issues.

63 The SU understand that safeguarding matters can be sensitive and complex. They will address issues promptly and delicately for those involved in a safeguarding situation. Either as the one raising a concern or being implicated.

64 To contact the SU, email [suadvice@bnu.ac.uk](mailto:suadvice@bnu.ac.uk). They can arrange a confidential consultation with an adviser who can provide the support needed in a safeguarding situation.

## **Staff**

65 Staff at BNU play a vital role in maintaining the safety and wellbeing of our community. If, as a staff member, you raise a safeguarding concern, the University is committed to providing the necessary support throughout this process.

66 Raising a safeguarding issue might involve personal and professional challenges. BNU assures its staff members that their rights and wellbeing will be protected throughout this process.

67 When raising a safeguarding concern, staff should understand the necessity of sharing relevant information to properly address the issue. Staff must balance the duty to protect individuals from harm with respecting their privacy. If a safeguarding risk is identified, information may need to be shared with relevant parties in the best interest of the individual's safety and wellbeing.

68 Importantly, transparency should be maintained throughout this process. Whenever possible and appropriate, the individual (student or other party) about whom a concern is being raised should be informed of the information to be shared, who it will be shared with, and why this is necessary. This reinforces the culture of respect and dignity we strive to uphold, while ensuring necessary action can be taken to mitigate any safeguarding risks.

69 For any queries or concerns related to the policy, or if additional support is needed, individuals can reach out to the Human Resources department ([humanresources@Bnu.ac.uk](mailto:humanresources@Bnu.ac.uk)), their line manager, or the Designated Safeguarding Lead and/or Safeguarding Officer. These sources are available to provide guidance, advice, and resources to help navigate the situation effectively.

## **Wider Community**

70 BNU recognises the vital role that the wider community plays in safeguarding our learners, staff, and visitors. We appreciate the vigilance and concern of those beyond our immediate University community who might raise a safeguarding issue.

71 We understand that raising a safeguarding issue can be a difficult decision and could lead to worries or anxieties about the process. BNU is committed to providing appropriate support and guidance to those who make such reports, while ensuring confidentiality.

72 Guidance will be provided through the University's Safeguarding Procedure, explaining each step in straightforward language and answering any potential queries. Individuals can be informed about potential outcomes, all the while upholding confidentiality and due process. It is assured that every safeguarding report is handled with the highest level of seriousness and thoroughness, respecting the needs and wellbeing of all those involved.

## Responsibilities

73 Safeguarding is a responsibility shared by everyone at BNU, but there are clearly defined roles and responsibilities. Our senior leaders lead by example, displaying a strong commitment to the safety and wellbeing of our learners and staff. They play a key role in overseeing, implementing, and driving our safeguarding initiatives.

74 The University has designated the Director for Student Success as the **Designated Safeguarding Lead (DSL)** who is supported by the **Safeguarding Officer(s) (SO)**. They play a crucial role in ensuring the effectiveness of our safeguarding measures. They are responsible for monitoring all matters related to safeguarding, compiling reports, and swiftly responding to any concerns that may arise.

75 The university provides comprehensive safeguarding training, this is mandatory for those involved in apprenticeships. This training encompasses various essential topics including recognising and responding to abuse, understanding, and implementing the Prevent strategy, and upholding British values. This training is a crucial aspect of our commitment to maintaining a safe and respectful environment for all. The university provides mandatory Prevent training for all staff.

76 Our employees, along with our partners like the Security team and the Bucks Students' Union, play a vital role in championing our code of behaviour and good practice. They actively promote the standards we aim uphold and the positive environment we aim to create, rather than being passive observers.

## Policy Review

77 The University Executive Team (UET) will receive regular reports on the impact and effectiveness of this safeguarding policy. These reports will be completed termly and annually, ensuring continuous monitoring and assessment.

78 To ensure our policy remains responsive to evolving risks, legal requirements, and best practices, it will undergo regular updates and revisions based on the insights gathered from these reports and evaluations. This iterative approach ensures that our safeguarding measures remain relevant, comprehensive, and robust, effectively maintaining the safety and well-being of our University community.

## Contact List

For any concerns or issues related to safeguarding, please contact the appropriate personnel listed below:

### **Reporting a Safeguarding, Prevent, Sexual Misconduct (or any other) Concern:**

<https://reportandsupport.bnu.ac.uk/>

### **Safeguarding and Prevent Lead:**

Director for Student Success

Email: via [safeguarding@bnu.ac.uk](mailto:safeguarding@bnu.ac.uk)

### **Deputy Safeguarding and Prevent Lead**

Head of Student Wellbeing

Email: via [safeguarding@bnu.ac.uk](mailto:safeguarding@bnu.ac.uk)

### **Employer Contact (for apprentices):**

Email: [apprenticeships@bnu.ac.uk](mailto:apprenticeships@bnu.ac.uk)

Phone: 01494 522 141

### **Student Success and Support**

Email: [students@bnu.ac.uk](mailto:students@bnu.ac.uk)

Phone: 01494 603 020

In case of emergencies or immediate safeguarding concerns, please contact your local police or emergency services. Remember, it is crucial to report any safeguarding concerns promptly, regardless of whether you are sure about them or not.

## Table of Definitions

### General Safeguarding Definitions

| Term  | Definition   |
|---|--|
| <b>At Risk Adult</b>                              | A person aged 18 or over who is, or may be, in need of community care services due to mental or other disability, age, or illness; and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation.                    |
| <b>Child</b>                                      | Any person under the age of 18.  |
| <b>Confidentiality</b>                            | Information related to safeguarding concerns will be kept confidential and will only be shared with those who need to know to ensure safety and to take appropriate action.  |
| <b>Consent</b>                                    | The informed agreement by a person for something to happen after they have been informed about possible risks and consequences.  |
| <b>Data Protection</b>                            | Safeguards to protect individuals' personal data and privacy against unauthorised access or breach. Only authorised individuals who need to access an individuals' data will be able to do so.   |
| <b>Designated Safeguarding Lead (DSL)</b>         | The designated safeguarding lead (DSL) is a person responsible for ensuring the safety and well-being of children or adults at risk within an organisation. They coordinate safeguarding efforts, provide guidance and support, and serve as the main contact for safeguarding concerns. |
| <b>Disclosure and Barring Service (DBS) Check</b> | A process of gathering information about an individual to determine if they are suitable for certain types of work, particularly work involving children or vulnerable adults.   |
| <b>Mental Capacity</b>                            | The ability to make a specific decision at a specific time, including understanding and retaining information long enough to make the decision, weighing up the information available, and communicating the decision.   |
| <b>Prevent Duty</b>                               | A statutory duty for certain bodies to have due regard to preventing people from being drawn into terrorism.   |
| <b>Reporting Procedures</b>                       | Steps followed by individuals or organisations when reporting a concern, incident, or allegation.  |
| <b>Risk Assessment</b>                            | A process for identifying potential risks or hazards and assessing the level of risk presented. This helps to inform decision-making and develop appropriate controls or strategies.   |
| <b>Safeguarding</b>                               | Measures taken to protect the health, wellbeing, and human rights of individuals, which allow people — especially children, young people, and adults at risk — to live free from abuse, harm, and neglect.   |
| <b>Safeguarding Officer</b>                       | A Safeguarding Officer promotes and maintains a safe environment within an organisation. They work closely with the DSL, implement safeguarding policies, provide training, conduct risk assessments, and respond to safeguarding concerns.  |
| <b>Whistleblowing</b>                             | The act of reporting misconduct or inappropriate action within an organisation, often through a specific procedure or designated official.   |

## Definitions of Types of Harm and Abuse

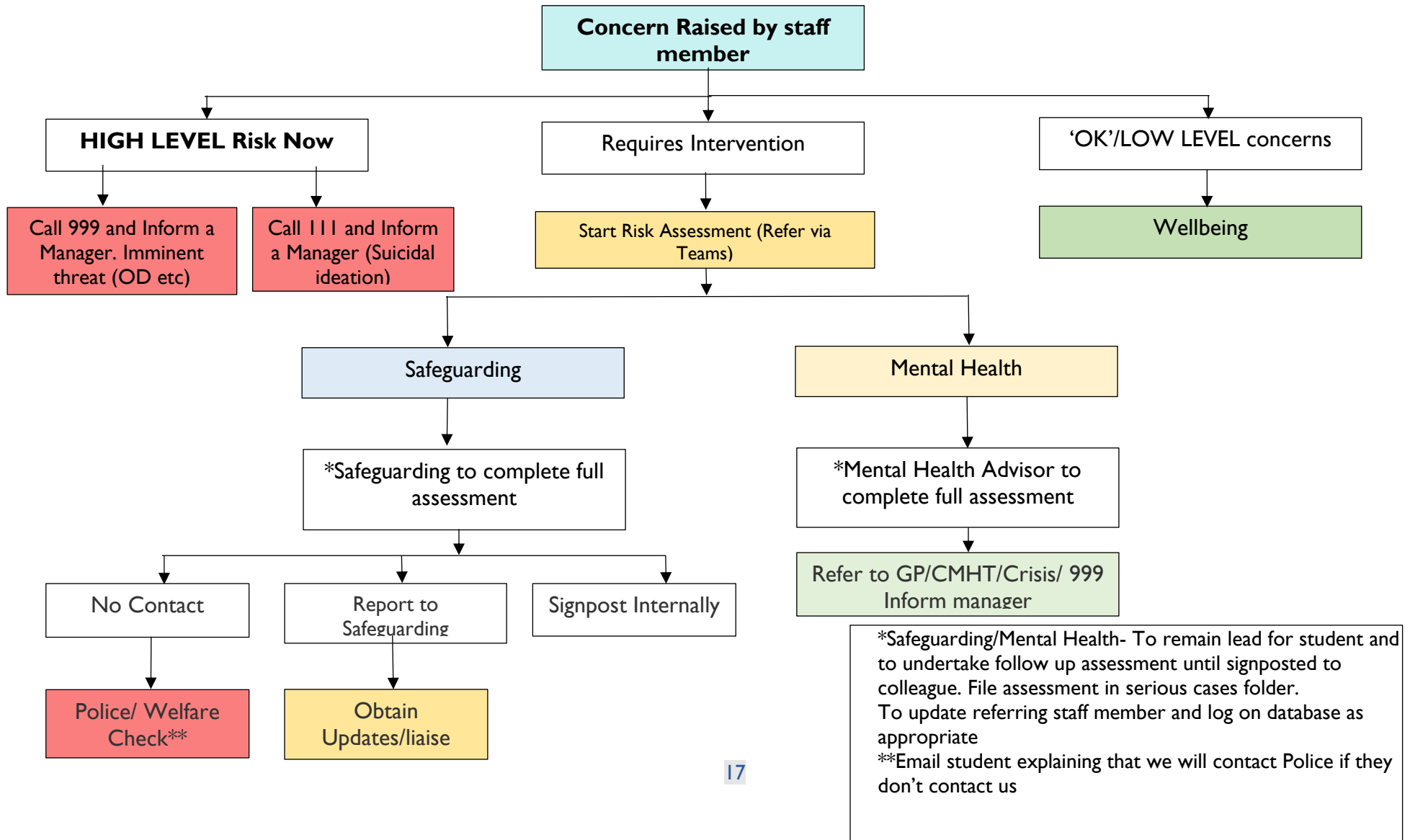
| Term   | Definition  |
|--|---|
| <b>Abuse</b>                                 | Any action by another person that causes significant harm to a child or adult. This can be physical, sexual, emotional, or financial abuse, or neglect.   |
| <b>Cyberbullying</b>                         | The use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature.  |
| <b>Discriminatory abuse</b>                  | Racism, sexism, abuse based on a person's disability, and other forms of harassment, slurs, or similar treatment.   |
| <b>Domestic Abuse</b>                        | Domestic abuse refers to any incident or pattern of controlling, coercive, threatening, or violent behaviour by a person towards their intimate partner or family member. It encompasses physical, emotional, sexual, and financial abuse, as well as coercive control. The aim is to gain power and control over the victim. |
| <b>Financial abuse</b>                       | Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance, or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.   |
| <b>Modern Slavery</b>                        | Modern slavery refers to the exploitation and control of individuals through various forms, such as human trafficking, forced labour, domestic servitude, criminal and sexual exploitation, and debt bondage. It involves depriving individuals of their freedom and exploiting them for labour or personal gain.             |
| <b>Neglect</b>                               | Ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health care and support or educational services, or withholding the necessities of life, such as medication, adequate nutrition, and heating.   |
| <b>Online Grooming</b>                       | Actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.  |
| <b>Organisational or Institutional abuse</b> | Mistreatment or abuse by a regime or individuals within institutions, this could be through repeated acts of poor or inadequate care and neglect, or poor professional practice.  |
| <b>Physical abuse</b>                        | Hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.   |
| <b>Psychological or Emotional abuse</b>      | Threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.   |
| <b>Radicalisation</b>                        | The process by which a person comes to support terrorism and forms of extremism leading to terrorism.   |



|                     |  |
|---------------------|--|
| <b>Self-neglect</b> | This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health, or surroundings and includes behaviour such as hoarding.   |
| <b>Sexual abuse</b> | Direct or indirect involvement in sexual activity without consent.<br><br>Involves situations, contexts, and relationships where young people or adults receive something because of them performing sexual activities or others performing sexual activities on them. |

79 These definitions provide a basic understanding of safeguarding terms. Please note that the definitions can vary, and some actions may fit into more than one category.

# Appendix 1: Safeguarding Flowchart



## Appendix 2: Safeguarding Procedure

### Emergency Situations

In emergency situations where the safety or wellbeing of a student or staff member is at immediate risk, you should follow these steps:

- **Ensure Safety:** If there is an immediate threat to someone's life or physical safety, dial 999 to contact the emergency services first. Do not put yourself or others at unnecessary risk while doing so.
- **Contact University Security:** Once you have contacted the emergency services, inform the University Security team immediately. They are trained to manage emergency situations on campus and can provide support until the emergency services arrive.
- **Provide Essential Information:** When reporting the situation, whether to the emergency services or University Security, provide as much detail as possible. This could include the nature of the emergency, location, the number of people involved, and any notable features or behaviours.
- **Cooperate with Emergency Services and University Staff:** Follow the instructions provided by the emergency services and University staff. They are equipped with the necessary training to handle such situations.
- **Report the Incident:** Once the immediate risk has been addressed, a full report of the incident should be submitted via the University's Report and Support Form as soon as possible. This ensures the incident is properly recorded, and further support or action can be taken if needed.

Where any alleged misconduct has occurred, which may constitute a violation of the Student Code of Conduct, the procedures for dealing with alleged breaches will be followed.

- **Debrief and Support:** In the aftermath of an emergency, it is important to debrief with those involved and the University's safeguarding team. This process helps everyone to understand what happened, learn from the incident, and ensure appropriate support is available.

Please remember, your safety and wellbeing, along with the safety of others, is BNU's utmost priority. Always alert the appropriate personnel if you witness or are involved in an emergency.

### Non-Emergency Situations

For situations that do not pose an immediate threat but still require attention due to safeguarding concerns, follow these steps:

- **Identify the Concern:** Safeguarding issues can take many forms, including suspicions of abuse, bullying, harassment, radicalisation, or any form of inappropriate behaviour. If you observe or are informed of such issues, it is important to act.
- **Record the Information:** Write down the details of the concern as soon as possible, providing as much information as you can. This may include who is involved, when and where the incident happened, what was said or done, and whether there were any witnesses.
- **Submit a Report:** Use the University's Report and Support Form to submit your concern. The form provides a secure and confidential means of reporting the issue and ensures it reaches the relevant personnel.
- **Respect Confidentiality:** Maintain the privacy of all parties involved. Share the information only with those who need to know or can directly help, such as a safeguarding officer or relevant University staff.

- **Cooperate with Follow-up Actions:** Depending on the nature of the concern, the University may take further steps. This could include an investigation, disciplinary action, or provision of support services. Cooperate with these procedures to ensure the best outcome for all involved.
- **Offer Support:** If you are directly involved with the person at the heart of the concern, continue to offer appropriate support within your role, respecting boundaries, and confidentiality.

The University is committed to ensuring the safety and wellbeing of its learners and staff. If you ever have a safeguarding concern, even if you are unsure, it is always better to report it. We are here to help.

## Safeguarding Concerns Related to Criminal Matters

In instances where safeguarding concerns also suggest potential criminal conduct, BNU has clear protocols:

- **Reporting to Authorities:** If an allegation or concern is of a nature that it could be criminal, it must be reported to the police immediately.
- **Cooperation with Investigations:** The University is committed to cooperating fully with any criminal investigations. This includes, but is not limited to, providing any evidence we hold and making staff, learners, or other members of our community available for interviews, as necessary.
- **Internal Actions:** While police investigations are ongoing, the University will also consider what immediate actions may be necessary to ensure the safety and wellbeing of our community. This could include temporary suspension or changing accommodation or class arrangements.
- **Support for Affected Individuals:** In such circumstances, the University will provide appropriate support to any individuals affected. This may include counselling, academic flexibility, or other measures to help individuals navigate this challenging time.
- **Preserving Confidentiality:** Within the bounds of legal obligations and safety requirements, the University will strive to maintain confidentiality to protect the dignity and privacy of all parties involved.

Staff and students must not attempt to investigate potential criminal matters themselves, but you should report them and allow the proper authorities to conduct any necessary investigation.

## Investigation of a Safeguarding Concern

When a safeguarding concern is reported, we are committed to taking it seriously and investigating thoroughly. Here's a general outline of how the process may unfold:

- **Receipt of Report:** Upon receiving a safeguarding concern through any of the mentioned channels, our dedicated safeguarding team is alerted. The team will promptly acknowledge the receipt of the report, reassuring the reporting party that their concern has been heard and will be addressed.
- **Initial Assessment:** The safeguarding team will conduct an initial assessment of the concern. This involves reviewing the information provided, determining the nature of the concern, and assessing the level of risk involved.
- **Investigation:** Based on the initial assessment, a more detailed investigation may be launched. This could involve interviewing relevant individuals, examining evidence, or consulting with external agencies, where appropriate. The focus of the investigation is to ascertain the facts while ensuring the safety and wellbeing of all parties involved.

- **Outcome:** At the conclusion of the investigation, an outcome is determined based on the findings. Actions could range from providing additional support and resources, making adjustments to work or learning environments, or, in more severe cases, disciplinary proceedings may be initiated.
- **Feedback:** Where appropriate and within the confines of confidentiality, feedback will be given to the individual who reported the concern, assuring them that the issue has been addressed.
- **Support:** Throughout the investigation process and thereafter, support is available to all parties involved. The wellbeing of our learners and staff is our top priority, and we are committed to maintaining a safe and supportive environment.
- Please note that this process can vary based on the specifics of the concern raised. All steps taken are in adherence to our safeguarding policy and any relevant legislation. The University reserves the right to modify the process as necessary to ensure the safety of all parties involved.

## Malicious Allegations

While BNU encourages open reporting of any concerns, it is important to recognise that safeguards are in place to protect individuals from unfounded or malicious allegations. Here is how we approach such situations:

- **Investigation:** If an allegation is made, it will be investigated thoroughly and fairly. If during this investigation, an allegation is found to be intentionally false, deliberately designed to harm or deceive, or made with malicious intent, it will be considered a serious matter.
- **Consequences for False Accusations:** Intentionally making a false accusation with the purpose of causing harm or distress to another individual can have serious consequences. For students, this could lead to disciplinary action under the University's Student Code of Conduct, which may range from warnings to expulsion. For staff, disciplinary action could be initiated, which may include dismissal in extreme cases.
- **Support for the Accused:** Individuals who are the subject of malicious allegations will be supported by the University. The University acknowledges the distress that such allegations can cause and will provide assistance, such as counselling services, and academic or professional support, as appropriate.
- **Maintaining Confidentiality:** All information related to the allegations will remain confidential during the investigation. Only those who need to know to conduct the investigation and implement its findings will have access to this information.

Everyone in our community is encouraged to use our safeguarding procedures responsibly and to bear in mind the serious implications of making false or malicious allegations.

## Safeguarding Review Process

Our Safeguarding Review Process is a crucial part of our commitment to promoting safety and wellbeing within our University community. It allows us to continuously improve our safeguarding measures based on past incidents and evolving needs. Here are the steps involved:

- **Routine Monitoring:** The University's Safeguarding Team routinely monitors the implementation of our safeguarding policy, its effectiveness, and any related incidents.
- **Incident Evaluation:** Any safeguarding concerns reported are carefully evaluated. This includes reviewing the response, the outcome, and the support provided to all parties involved. This analysis helps us understand what worked well and where we could improve.

- **Feedback Collection:** We encourage feedback from learners, staff, and any others involved in a safeguarding issue. This first-hand perspective is crucial to understanding our strengths and identifying areas for improvement.
- **External Review:** As appropriate, we may engage external professionals to review our safeguarding policies and practices. This independent perspective can provide additional insights and recommendations.
- **Policy Review and Update:** Based on the findings from incident evaluations, feedback, and any external reviews, we periodically review and update our safeguarding policy. This ensures our approach to safeguarding remains robust and fit for purpose, reflecting best practice and current legislation.
- **Training and Communication:** Any updates to our policy or practices are communicated across the University, and we ensure that our staff and learners receive any necessary training or information.
- **Continual Improvement:** The review process is a continuous cycle. We are always learning and improving, ensuring our safeguarding measures effectively protect our University community.

The University Executive Team (UET) will receive regular reports on the impact and effectiveness of this safeguarding policy. These reports will be conducted termly and annually, ensuring continuous monitoring and assessment.

This Safeguarding Review Process, while thorough, is not exhaustive. We are always open to new ideas and approaches that could enhance our safeguarding practices.

## **Appendix 3: Actions for Specific Safeguarding Concerns**

### **Concerns raised that a child (under 18) may be at risk.**

If concerns are raised regarding a child under 18, the University's Designated Safeguarding Lead (DSL) or the Safeguarding Officer (SO) will take immediate action.

This will include:

- Thoroughly reviewing the Report and Support form submitted.
- Assessing the risk and severity of the situation.
- Engaging with local authority children's social care services, if deemed necessary.
- Liaising with other appropriate external agencies to ensure the child's safety.
- Ensuring that the child is supported throughout the process and that all necessary measures are taken to mitigate any risk.

### **Concerns raised regarding an 'adult at risk'.**

Upon receiving a Report and Support form raising concerns about an 'adult at risk', the following steps will be taken:

- Detailed examination of the report by the DSL or SO.
- A risk assessment to determine the severity and nature of the situation.
- Collaboration with the local authority Adult Social Care, if deemed necessary.
- Engagement with other suitable agencies to ensure the safety and wellbeing of the adult concerned.
- Providing support and reassurance to the adult during the process.

### **Concerns raised regarding violence against women, harassment or hate crime.**

When the University is informed of violence against women, harassment, or hate crimes, immediate steps will be taken:

- Detailed examination of the Report and Support form by the DSL or SO.
- Assessment of the risk to the victim and others involved.
- Liaison with local police and support services.
- Ensuring the safety and wellbeing of the victim is prioritised.
- Continued support and reassurance to the victim throughout the process.

### **Students on placement, in partner institutions, and apprentices**

If concerns are raised about learners on placement, those in partner institutions, or apprentices, the University will act swiftly:

- The DSL or SO will thoroughly review the submitted Report and Support form.
- The severity of the situation will be assessed.
- Coordination with the relevant institutions or employers will be undertaken.
- The appropriate steps will be taken to ensure the safety and wellbeing of the learners involved.
- Continuous support will be provided throughout the process.

### **Concerns about the behaviour of a member of staff**

When concerns are raised about the behaviour of a member of staff, the University responds promptly and effectively:

- The DSL or SO will carefully examine the Report and Support form.
- An assessment of the severity of the situation will be made.

- If necessary, involvement of the Human Resources department will be initiated to handle potential disciplinary procedures.
- Actions will always prioritise the safety and wellbeing of the University community.
- Support and reassurance will be provided to all parties involved.



## Appendix 4: Examples of Safeguarding Concerns

There are several situations that could make us put this policy into action, and they are outlined in the definitions provided. This list is not everything, but it covers the most common situations:

- Different types of abuse, including things that happened a long time ago.
- Bullying and harassment, which can include hate crimes.
- Radicalisation.
- Violence aimed at women.

Deciding to use this policy depends on a few key things:

Safeguarding reports should be supported, where possible, with specifics - exactly what the person being reported said or did.

- How severe the treatment was.
- How much harm was done, and how widespread it was.
- How long the abuse or neglect lasted, and how often it happened.
- Whether someone saw what happened, or if it was reported second-hand.

### More Information on Potential Concerns

#### Abuse

Abuse can come in many forms and is generally thought of as cruel and/or violent behaviour. It could be a one-off, or it might keep happening. It might be done on purpose or not. Importantly, abuse can also happen between equals, and it could be carried out by children, young people, and adults who might be at risk.

Abuse could also be seen as neglect, or not doing something when you should, by someone who is supposed to be caring for someone else. This understanding of abuse highlights the importance of everyone knowing and playing their part in safeguarding within our community.

#### Radicalisation

Radicalisation refers to the process through which an individual develops a strong inclination towards extremist ideologies, potentially leading to supporting acts of terrorism.

Further information on the signs and more detailed advice can be found in the [Appendix 5: Understanding the Prevent Strategy](#) and the Prevent Policy. We encourage everyone to familiarise themselves with these resources as part of their safeguarding responsibilities. It is vital that we all remain vigilant, supportive, and proactive in promoting safe and inclusive environments.

#### Modern Day Slavery

Modern day slavery is a severe violation of human rights that persists globally. This exploitative practice entraps individuals in situations they cannot escape due to threats, violence, coercion, deception, or the abuse of power. Forms of modern-day slavery can include, but are not limited to, forced labour, debt bondage, human trafficking, child labour, and forced marriage. It is a hidden crime that preys on the most vulnerable, stripping them of their fundamental freedoms and forcing them into a life of servitude and exploitation.

Awareness of the signs of modern-day slavery can play a significant role in early identification and intervention. Here are some indicators to be alert for:

- **Restricted Freedom:** The individual seems unable to leave their living or working conditions or has limited freedom of movement.

- **Behavioural Changes:** The person exhibits unusual fear, anxiety, depression, or subservience.
- **Unusual Working Hours or Conditions:** The individual is made to work excessively long hours, often in poor conditions, and may appear unusually tired or malnourished.
- **Lack of Personal Possessions or Identification:** The individual has few personal belongings and lacks personal identification or travel documents.
- **Signs of Physical or Emotional Abuse:** There are visible signs of physical abuse, malnutrition, or untreated injuries. The individual may also display symptoms of psychological trauma such as seeming withdrawn, distressed, or disconnected.
- **Reluctance to Seek Help:** The person is hesitant to talk or seek help, especially from authorities, and may provide scripted or inconsistent stories about their living or working conditions.
- **Controlled Communication:** The person seems to be constantly monitored, has little or no unsupervised communication, and may not be allowed to speak for themselves in social situations.

These signs may not be definitive proof of modern-day slavery but are potential indicators. If you notice any of these signs, it is crucial to report them immediately to ensure the safeguarding of the individual involved.

## Bullying and Harassment

Bullying and harassment are detrimental actions that can lead to significant emotional distress and harm. Bullying can be identified as repeated offensive, intimidating, or insulting behaviour, involving an imbalance of power, intended to undermine, belittle, or harm the targeted individual. It may manifest physically, verbally, or socially and can occur in person or online (cyberbullying).

Harassment involves undesired conduct often linked to a protected characteristic (e.g., race, sex, disability) that infringes upon an individual's dignity or generates an intimidating, hostile, degrading, or offensive environment.

Recognising signs of bullying and harassment is crucial. These signs may include, but are not limited to:

- Persistent and unjustified criticism, complaints, or blame.
- Belittling comments or mockery directed at the individual, their work, or their personal life.
- Public humiliation, reprimands, or social exclusion.
- Unreasonable or shifting expectations, unachievable targets, or excessive demands.
- Withholding necessary information, deliberate sabotage, or undermining an individual's efforts.
- Offensive, insulting, or threatening messages, emails, posts, or comments, both in person and online.
- Spreading malicious rumours or gossip about the individual.
- Unwanted physical contact or intimidation tactics.
- Discriminatory behaviours or comments, especially related to protected characteristics.

Every member of our University community has the right to be treated with respect and dignity. Incidents of bullying and harassment should always be reported, enabling the University to take appropriate action and provide the necessary support for those affected.

Further information and guidance can be found in the [Student Bullying and Harassment Policy](#).

## Sexual Violence and Harassment

BNU adopts a zero-tolerance approach to sexual misconduct. Sexual violence and harassment involves any unwanted sexual activity, forced upon a person without their informed consent. It can encompass a range of actions, from inappropriate touching to rape. Sexual abuse can also occur online, through the sharing of explicit images or messages without consent, a practice sometimes referred to as 'revenge porn' or 'image-based sexual abuse'.

Potential signs of sexual abuse may include:

- Unexplained changes in behaviour or personality
- Sudden or drastic changes in appearance or dress
- Unusual or inappropriate sexual behaviour or knowledge
- Fear or avoidance of certain places or individuals
- Frequent health issues, particularly those related to the reproductive system.
- Evidence or suspicion of physical harm, such as bruises or bleeding
- Emotional indicators such as depression, anxiety, or suicidal thoughts

Sexual abuse is a serious violation of a person's rights and autonomy. It is crucial to be aware of these signs and to report any suspicions of sexual abuse so that individuals can be protected and provided with the necessary support.

Where any misconduct has occurred, which may constitute a violation of the [Student Code of Conduct](#) the procedures for dealing with alleged breaches will be followed.

## Mental Health Concerns.

Mental health forms a crucial part of our safeguarding focus within the University community. Signs of mental health issues can vary, affecting student wellbeing, academic achievement, and overall University experience. Be alert for signs such as:

- Observable changes in mood or behaviour
- Decline in academic performance.
- Social withdrawal or isolation
- Exhibiting distress or extreme emotional reactions
- Notable changes in appetite or physical appearance

These signs may indicate a need for support or intervention. Students experiencing mental health concerns should be encouraged to access the University's mental health support services.

Members of staff can access the [Employee Assistance Program \(EAP\)](#) If you believe they may be at risk (not an immediate threat to life) then you can submit a report through the University's Report and Support form.

## Domestic Abuse/Violence

Domestic abuse or violence manifests in various forms, impacting an individual's wellbeing and safety. Being vigilant to signs of such abuse within our community is everyone's responsibility. Indications might include:

- Inexplicable injuries or signs of physical abuse
- Frequent unexplained absences from classes or other commitments
- Changes in behaviour, demeanour, or academic performance
- Displays of fear or avoidance of specific individuals
- Observable signs of control or coercion by a partner or family member

If there are concerns a member of the University community might be experiencing domestic abuse or violence, use the University's Report and Support form to share your concerns promptly.

## **Homelessness and Housing Insecurity**

Addressing homelessness and housing insecurity forms a key aspect of our safeguarding responsibilities. Students experiencing such issues often need specific resources and support. Be aware of potential signs:

- Regular unexplained absences from classes
- Lack of a fixed, regular, and adequate night-time residence
- Observable signs of fatigue or related health issues
- Disorganised personal belongings or carrying excessive belongings.
- Indicators of poor hygiene or lack of access to facilities such as laundry

If you observe any of these signs, or if a student discloses housing insecurity or homelessness, use the University's Report and Support form to report this information immediately. Our University is committed to offering support and resources to these students.

## Appendix 5: Understanding the Prevent Strategy

*This is a brief overview of the Prevent strategy, please refer to Prevent Policy for further information.*

The UK government's counter-terrorism strategy, known as '[Contest](#)', is composed of four principal elements, colloquially referred to as the 'four P's': **Prevent**, **Pursue**, **Protect**, and **Prepare**.

### **Prevent**

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. It focuses on countering extremist ideologies that can fuel terrorism and intervening with individuals who show signs of moving towards radical or extremist views.

### **Pursue**

Pursue aims to halt terrorist attacks by detecting, prosecuting, and disrupting those who plan to execute attacks against the UK or its interests overseas.

### **Protect**

Protect works to reinforce protection against terrorist attacks in the UK or against its interests overseas, thus reducing their vulnerability. The focus is on border security, transport systems, national infrastructure, and public spaces.

### **Prepare**

Prepare seeks to mitigate the impact of a terrorist attack in cases where the attack cannot be stopped. This involves efforts to bring a terrorist attack to an end and to increase the UK's resilience to recover from the aftermath.

## Understanding Radicalisation

Radicalisation has four primary roots: **Ideology**, **Theology**, **Grievance**, and **Mental Health** issues. Prevent objectives are designed around these roots and aim to:

- Respond to the ideological challenges of terrorism and the threat we face from those who promote it.
- Safeguard those at risk of becoming radicalised.
- Collaborate with various sectors and institutions (including education, faith, health, and criminal justice) where risks of radicalisation need to be addressed.

## Recognising Signs of Radicalisation

Recognising signs of radicalisation is a crucial part of safeguarding vulnerable individuals. Some of the indicators that an individual may be at risk of radicalisation include:

- Changes in behaviour and mood.
- Expressed support for violence and terrorism.
- Increasing sympathy for extremist acts.
- Expression of extreme political or radical views.
- Dramatic changes in appearance or friends.
- Spending excessive time alone.
- Possession of violent extremist literature or material regarding weapons, explosives, or military training.

## Channel Process

The '[Channel](#)' process is a key part of the Prevent strategy. It involves a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. The

process assesses the nature and extent of the risk and develops a tailored support package for the individual's needs.

This is not about informing on individuals for prosecution; rather, it focuses on diverting people from potential harm at an early stage, thereby preventing them from being drawn into terrorism.

### **University's Role and Channel Referral Panel**

At BNU, we have established a Channel Referral Panel, which includes the Designated Prevent Lead responsible for Prevent/radicalisation. The Panel reviews cases where a referral to Channel may be necessary and determines whether such a referral should occur. It may also seek external advice, such as from a Prevent coordinator.

Should a referral be made, it will usually be to the relevant local authority Channel panel, which will then assess whether Channel support is appropriate. If so, the individual concerned will be informed at this stage and offered support by the local authority Channel panel.

By understanding and applying these principles, our University plays a vital role in the national strategy to prevent terrorism, ensuring the safety and wellbeing of our learners, staff, and wider community. More information about Prevent at the University can be found in the Prevent Policy.

## Appendix 6: Supporting and Safeguarding Apprentices

### Keeping Apprentices Safe

Our commitment to keeping apprentices safe is steadfast and is managed by the **Designated Safeguarding Lead (DSL)**, the Director of Student Success. This officer oversees the Safeguarding Policy, ensures its regular review and application. In addition, all University staff members working with apprentices receive safeguarding training and can seek further information, advice, and training when needed.

#### **The University's Role:**

- Upholding our commitment to safeguarding, guided by our DSL.
- Ensuring the regular review and implementation of our Safeguarding Policy.
- Providing safeguarding training to all University staff working with apprentices, along with access to additional resources as required.

As for the employers, they are obliged to abide by all current and prospective UK legislation and statutory responsibilities. It is crucial that employers actively contribute to the welfare of apprentices in the workplace and seek suitable advice when they suspect an apprentice may be at risk personally. We understand this can be a challenging area for many organisations.

#### **The Employer's Role:**

- Complying with all current and upcoming UK legislation and statutory duties.
- Taking responsibility for an apprentice's welfare within the workplace.
- Seeking appropriate advice when an apprentice is perceived to be at risk in their personal lives.

We encourage employers to refer to the subsequent sections, which elaborate on the different support mechanisms provided by the University and suggest ways to incorporate this information into your existing internal procedures.

### Safeguarding

Safeguarding is a critical aspect of our commitment to the wellbeing and safety of apprentices, taking measures to prevent any harm, abuse, neglect, or exploitation.

#### **The University's Role:**

- Ensure employers comprehend their safeguarding duties through provided guidance and training.
- Make sure apprentices are knowledgeable about safeguarding and know how to access University support services.
- All university staff involved in the organisation, management or delivery of apprenticeships must complete mandatory safeguarding training.
- Guarantee that University staff working with young and vulnerable individuals undergo an enhanced Disclosure and Barring Service check.
- Keep communication lines open with all employers, recognising that apprentices may behave differently in different settings and might prefer discussing sensitive matters with various individuals.

#### **The Employer's Role:**

- Ensure they understand and comply with relevant government legislation.
- Take the necessary steps to comprehend what safeguarding entails within their organisation and in relation to their responsibilities towards their employees.

- Make sure that any staff in a position of trust with apprentices are fit for their role and pose no risk.
- Ensure that any individuals working with young or vulnerable people have had a suitable check completed by the Disclosure and Barring Service.
- If feasible, designate a person within the organisation to oversee and coordinate safeguarding efforts.

## Prevent

Under the Counter-Terrorism and Security Act 2015, universities are obligated to pay '*due regard to the need to prevent individuals from being drawn into terrorism*'.

Identifying someone who may be vulnerable to extremist ideology is not straightforward. Often, it is a combination of several influences, including family, friends, online relationships, and even non-violent actions.

### **The University's Role:**

- All university staff involved in the organisation, management or delivery of apprenticeships must complete mandatory prevent training.
- Having clear procedures to ensure any concerns are immediately directed to the appropriate specialists.
- Providing a point of contact for any further information about the Prevent Duty.
- Ensuring apprentices can express their views in non-extremist ways and fostering an environment that encourages respectful free speech.

The role of employers is crucial in this aspect too.

### **The Employer's Role:**

- Demonstrating a firm commitment to the principles underpinning the Prevent Duty.
- Seeking specialist support and guidance to properly implement and enforce the Prevent strategy in the workplace.
- Ensuring that their organisation maintains an environment of mutual respect, understanding, and acceptance, which is the most effective way to mitigate the risk of extremism.
- Regularly training their employees, especially those working closely with apprentices, on the signs of vulnerability to extremism and appropriate actions to take if concerns arise.
- Encouraging open dialogues and discussions, which can contribute to a more inclusive and accepting workplace, thereby reducing the risk of extremism.
- Establishing clear procedures for reporting any concerns about an apprentice potentially being drawn into extremist ideologies.
- Collaborating closely with the University and sharing relevant information as appropriate to safeguard the wellbeing of apprentices.

## Staying Safe Online

The growing prevalence of the internet and digital technology has enhanced the learning environment and broadened the personal perspectives of apprentices. However, the vast nature of online content necessitates skills for safe internet use and the development of appropriate online behaviours. It is essential for individuals to understand how to safeguard themselves online and protect their personal data, with potential risks ranging from bullying and abuse to identity theft and viruses. Part of an apprentice's growth at the University involves cultivating a critical mindset, which aids in evaluating the credibility of online information.



### **The University's Role:**

- Assess potential risks that apprentices might encounter when using the internet or technology.
- Offer relevant training for apprentices to enable safe and effective online work.
- Assist apprentices in developing a critical perspective towards online information and in evaluating its authenticity.
- Ensure that University staff are trained to identify and address concerns about online safety.
- Provide clear guidelines on what constitutes acceptable and unacceptable internet use at the University.

As for employers, their role in this aspect is just as significant.

### **The Employer's Role:**

- Make sure apprentices are familiar with the organisation's policies on using the internet and technology in the workplace.
- Understand the risks that apprentices might face when using technology in the workplace and take actions to mitigate these risks.
- Promptly communicate any concerns about online safety to the University.

## **Practical Approach to Safeguarding**

The University stands as a reliable resource, and we encourage you not to hesitate to reach out if you require support managing any situation. We acknowledge that apprentices may feel at ease discussing certain issues with some people and not others. Therefore, the University will strive to maintain transparency with employers while respecting the trust of apprentices and adhering to University confidentiality policies.

While much of safeguarding activity is proactive, we also advocate for regular meetings and supervisory sessions with your apprentice to promptly address any emerging concerns. It is important to note that an apprentice may not always seek help regarding a safeguarding issue, but there are common signs that can indicate potential issues.

In situations of emergency or suspected severe issues, it is recommended to contact the appropriate authorities immediately.

### **Warning Signs:**

- **Absence:** Consistently missing work or University sessions.
- **Appearance:** Noticeable changes in physical appearance.
- **Behaviour and Character:** Significant shifts such as becoming overly quiet or loud, aggressive, or withdrawn.
- **Emotional Health:** Manifestations like crying, anxiety, or low mood.
- **Alcohol Consumption:** Excessive alcohol intake.
- **Physical Injuries:** Unexplained cuts or bruises.
- **Living Conditions:** Evidence of poor living conditions.
- **Self-Harm:** Indications of self-harming behaviour.
- **Drug Use:** Observable signs of drug use.
- **Activity Withdrawal:** Reluctance to go online, abrupt changes in the use of technology.

It is crucial to underline that the presence of some of these signs does not definitively indicate that something is wrong. However, they provide crucial cues to be alert to, enabling early intervention when necessary.

## Appendix 7: Equality Impact Assessment

|  |                                     |                                     |   |   |
|--|-------------------------------------|-------------------------------------|---|---|
| <b>1. What is changing and why?</b>  |                                     |                                     |   |   |
| <p>The Safeguarding Policy at Buckinghamshire New University is being updated to further enhance the safety and well-being of all students and staff, particularly in cases of emergency situations, non-emergency situations, potential criminal conduct, and malicious allegations. The key reasons for the change include:</p> <ol style="list-style-type: none"> <li><b>Clarity and Comprehensive Approach:</b> The updated policy provides more detailed and systematic guidelines for handling various types of situations, making the policy more accessible and user-friendly for all stakeholders.</li> <li><b>Reinforcing Safety Measures:</b> The policy strengthens the procedures to ensure the safety of all members during an emergency and other situations.</li> <li><b>Legal and Regulatory Compliance:</b> The updated policy aligns with the latest legal and regulatory requirements to ensure BNU's practices are up-to-date.</li> <li><b>Support and Debriefing:</b> The policy further emphasises the importance of providing necessary support to those affected and debriefing after incidents, which helps in better understanding and learning from incidents.</li> <li><b>Continuous Improvement:</b> The policy outlines a safeguarding review process, showing BNU's commitment to continually improving its safeguarding measures based on past incidents and evolving needs.</li> </ol> |                                     |                                     |   |   |
| <b>7. What do you know?</b>  |                                     |                                     |   |   |
| <p><b>Sector Comparison:</b> A thorough comparison of safeguarding policies across the sector was undertaken. The policy aims to ensure the safety of all members of the University community.</p> <p><b>Best Practice Guidance and Law:</b> This policy is informed by a range of legislation, including the <a href="#">Health and Safety at Work Act 1974</a>; the <a href="#">Data Protection Act 2018</a>; safeguarding legislation and requirements such as the <a href="#">Safeguarding Vulnerable Groups Act 2006</a>, the <a href="#">Children Act 2004</a>, the <a href="#">Care Act 2014</a> and <a href="#">Keeping Children Safe in Education 2022</a>; the <a href="#">Equality Act 2010</a>, and the <a href="#">Counter Terrorism and Security Act 2015</a>.</p>   |                                     |                                     |   |   |
| <b>8. Assessing the impact</b>   |                                     |                                     |   |   |
|  | <b>Could benefit</b>                | <b>May adversely impact</b>         | <b>What does this mean?</b> <i>Impacts identified from what you know (actual and potential)</i>           | <b>What can you do?</b> <i>Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations</i> |
| <b>a) How could this affect different ethnicities?</b>   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Negative: Existing cultural and linguistic differences might complicate the understanding and application | Develop resources in multiple languages, provide cultural sensitivity training to all involved parties.   |

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| <b><i>Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.</i></b>                                      |                                     |                          | of the policy. This could potentially lead to non-compliance or misuse of the policy. <b>Positive:</b> The policy, when effectively communicated, can raise the understanding and sensitivity surrounding safeguarding issues among diverse ethnic groups.                                 | Conduct targeted outreach and workshops to ensure understanding and compliance. Ensure representation from diverse ethnic groups in policy review and implementation.  |
| <b>b) How could this affect cisgender and transgender men and women (including maternity/pregnancy impact), as well as non-binary people?</b>    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <b>Negative:</b> Deep-seated societal biases might intensify unique risks for these individuals, such as discrimination or harassment. <b>Positive:</b> When enforced correctly, the policy can provide a reinforced sense of security and assurance for these individuals.                | Provide specific training and education for all staff and students about issues relevant to these groups. Ensure sensitive and accessible reporting mechanisms are in place for issues related to gender and sexual identity. Ensure representation of these groups in the policy formulation process. |
| <b>c) How could this affect disabled people or carers? <i>Including neurodiversity, invisible disabilities and mental health conditions.</i></b> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <b>Negative:</b> Certain societal infrastructures may not fully address the specific needs or vulnerabilities of this group, leading to potential marginalization. <b>Positive:</b> The policy, with thorough consideration of their unique needs, could enhance safety and well-being.    | Implement adjustments for accessibility in the policy, provide additional support services as needed. Make sure to include representatives of this group in policy review and decision-making. Ensure regular feedback and updates on the policy's effectiveness.                                      |
| <b>d) How could this affect people from different faith groups?</b>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <b>Negative:</b> Potential misunderstandings or lack of awareness about diverse religious practices could lead to inadvertent exclusion. <b>Positive:</b> By acknowledging and respecting diverse faiths, the policy can foster a more inclusive and respectful environment.               | Provide cultural competency training to staff and students, promoting interfaith dialogue and creating forums for discussion and learning. Ensure representation of diverse faith groups in policy development and implementation  |
| <b>e) How could this affect people with different sexual orientations?</b>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <b>Negative:</b> Persistent societal prejudices can lead to unique risks for these individuals, including discrimination and harassment. <b>Positive:</b> The policy can foster an environment of safety and inclusion for all sexual orientations.  | Promote a culture of acceptance and inclusivity throughout the institution. Provide specific support services for individuals facing issues related to sexual orientation. Ensure representation of these groups in policy review and decision-making.   |
| <b>f) How could this affect different age groups or generations?</b>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <b>Negative:</b> Society's differential treatment of various age groups might lead to unique vulnerabilities and needs, potentially making some groups feel overlooked. <b>Positive:</b> A thoughtful approach could result in a policy that is tailored and effective for all age groups. | Tailor the policy to address specific needs of different age groups. Include representatives of various age groups in policy discussions and reviews. Promote age-specific educational initiatives on the policy.  |

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| g) How could this affect those who are married or in a civil partnership?  | <input checked="" type="checkbox"/>                 | <input type="checkbox"/>                             | <b>Negative:</b> Unintentional bias based on societal perceptions of marital status could lead to discrepancies in policy enforcement. <b>Positive:</b> The policy can promote equality by treating all individuals equally, irrespective of marital status.   | Ensure policy is applied uniformly, regardless of marital status. Conduct periodic audits to check for any unintentional biases. Create an open feedback environment to track and address any issues.  |
| h) How could this affect people from different backgrounds such as: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers.                    | <input checked="" type="checkbox"/>                 | <input checked="" type="checkbox"/>                  | <b>Negative:</b> Socio-economic disparities can intensify the vulnerabilities of those from disadvantaged backgrounds, potentially leading to greater challenges in accessing and benefiting from the policy. <b>Positive:</b> The policy, when implemented effectively, can provide a supportive structure for these individuals.   | Provide targeted support and resources to these individuals  |
| i) How could this affect people with multiple intersectional experiences?  | <input checked="" type="checkbox"/>                 | <input checked="" type="checkbox"/>                  | <b>Negative:</b> Those with multiple intersectional identities may face compounded challenges, with systemic barriers often amplifying each other. This can make understanding and compliance with the policy more complex, and can also increase vulnerability to discrimination and other risks. <b>Positive:</b> If the policy is comprehensively and thoughtfully designed and implemented, it can provide a heightened sense of security and empowerment for these individuals, acknowledging and respecting their multiple identities. | Carefully tailor the policy and its communication to take into account complex intersectional identities. Provide intersectional sensitivity training to all parties involved. Ensure these individuals have a strong voice in policy formulation, review, and implementation. Develop specific support structures and make resources easily accessible for these individuals. |
| <b>9. Overall outcome</b>  |   |  |  |  |
| No major change needed <input type="checkbox"/>  | Adjust approach <input checked="" type="checkbox"/> | Adverse impact but continue <input type="checkbox"/> | Stop and remove <input type="checkbox"/>   |  |
| <b>10. Details of further actions needed</b>   |   |  |  |  |
| <b>This policy is grounded in the applicable governmental laws and regulations, which are subject to changes over time. It remains committed to adhering to prevailing sector best practices and will evolve as new research data underlines the need for modifications.</b> |   |  |  |  |

Further, the policy is designed to adapt and respond as it uncovers structural inequalities or systemic barriers through its implementation.

### 11. Arrangements for delivery and future monitoring

**For the Safeguarding Policy for all members of the University community, the following actions and recommendations are put forth to enhance equality:**

**Policy Review:** The Safeguarding Policy undergoes regular annual reviews to assess its effectiveness and identify areas for improvement.

**Staff Training:** Provide comprehensive training for all relevant staff, ensuring they understand the intricacies and implications of the Safeguarding Policy. Ensure all staff understand and know how to use the “Support and Report” tool.

**Support Structure:** Develop a robust support framework for students and staff who may have concerns related to safeguarding or have safeguarding concerns raised about them. This includes the assignment of a dedicated support officer, access to resources, and a clear contact point for addressing any arising concerns.

**Stakeholder Engagement:** While the initial policy formulation might not have involved stakeholder engagement, we recognise the importance of involving stakeholders in future policy review and development. Those groups who are most vulnerable to safeguarding concerns should be consulted in future changes to the policy as well as relevant local authorities such as mental health teams, social work etc...

**Data Collection:** To address any data gaps, we conduct periodic surveys and analysis related to safeguarding incidents and concerns. The data gathered guides us in refining future versions of the Safeguarding Policy to better address the specific needs of our community.

**Transparent Communication:** Ensure transparent communication of the Safeguarding Policy to all applicants and students, with special attention given to those who may be more at risk, for example under 18s. Utilise various communication channels, such as emails, the University's website, or informational materials, to disseminate the policy effectively.

**Compliance Monitoring:** To maintain adherence to relevant laws and regulations, we institute a compliance monitoring system. Regular compliance reports are presented to senior management and stakeholders, ensuring continuous conformity with the Safeguarding Policy and legal requirements.

|                           |                      |   |             |                       |
|---------------------------|----------------------|---|-------------|-----------------------|
| <b>12. Completed by:</b>  | Name Justin Bootland | Position Head of Students and Wellbeing | <b>Date</b> | <b>30 August 2023</b> |
| <b>13. Signed off by:</b> | Name Paul Morgan     | Position PVC Student Experience         | <b>Date</b> | 31 August 2023        |



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