Ravensbourne University London Safeguarding Policy

Table of Contents

Document Control

Document Name	Safeguarding Policy
Revision	Issue 1
Date of Issue	21/11/2024
Written by	Lucy McLeod (Head of Student Services and DSL) and Andy Rees (Dean and Executive Lead)
Consultation and approval route	Approval Body: Executive Team Approved by Executive Team: 21/11/2024
Email queries:	l.mcleod@rave.ac.uk

Ravensbourne
University London

1   Introduction and overview

1.1   Purpose

Ravensbourne University London (RUL) regards the welfare of children, young people and adults at risk as paramount and takes seriously its statutory duty and moral responsibility to ensure that, in all its activities and functions, robust measures exist to safeguard children and vulnerable adults and to protect them from harm or abuse. Safeguarding is everybody's responsibility.

As a higher education institution with further education provision, RUL is committed to maintaining a safe and welcoming environment for staff, students and visitors, including children and adults, and recognises its additional safeguarding duties to children under the age of 18 and to "adults at risk".

RUL is committed to the care, respect and dignity of all children and adults regardless of age, disability, sex, racial heritage, religious belief, sexual orientation or identity, believing each individual has the right to equal protection from all types of harm or abuse.

This Policy outlines how members of the University community will safeguard children and "adults at risk" who are connected with the University and who come into contact with its staff, students, Governing Body members, volunteers or third parties acting on behalf of the University.

RUL's safeguarding arrangements extend to all those at risk of being drawn into extremist or terrorist activities (radicalisation) which are detailed in [our Prevent Duty under our General Academic Regulations](#).

To support the effective implementation of the Policy, the University's Executive Team is committed to raising awareness of safeguarding issues and instilling good practice guidelines across the Institution so that staff, students and volunteers can respond with confidence when safeguarding issues for children and "adults at risk" arise. It is important that all members of the University community know how to spot possible signs of abuse and neglect and how to report a concern, to ensure these are investigated and escalated, if required, to the statutory authorities in a timely way.

1.2   Key definitions

Safeguarding

Safeguarding is the range of actions taken to protect children and adults from abuse or neglect, prevent impairment of their health and development, and ensure they live in a safe environment that enables them to grow and develop.

Child/Under 18s

Ravensbourne
University London

- Anyone under the age of 18.[1]
- "Young person" is a term often used to refer to individuals aged 16 and 17, who remain legally defined as a child but who possess more legal rights than those aged under 16.

Adult at Risk (sometimes known as a "vulnerable adult")

The definition of an "adult at risk"[2] means an adult who:

- has needs for care and support (whether or not the authority is meeting any of those needs),
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

- Examples might include individuals who:
  - have learning disabilities;
  - have mental health problems including dementia;
  - are older person with support/care needs;
  - are physically frail or has chronic illness;
  - have a physical or sensory disability;
  - misuse drugs or alcohol;
  - have an autistic spectrum disorder.

Harm
- Harm is the impact to, or impairment of, a person's health, development of welfare caused by the ill-treatment of that person and can include the impact suffered by them as a result of seeing or hearing the harm done to other people.
- Statutory, regulatory and professional guidance shows that judgements about whether harm constitutes "significant harm", which is likely to require external intervention to prevent further harm, need to be made by health and social care professionals.

Abuse
- Abuse involves the mistreatment of a child or adult at risk. Abuse can be caused by inflicting harm, or by failing to act to prevent harm and can be perpetrated by adults and/or children.
- Abuse means physical, sexual, psychological, emotional or financial abuse and includes abuse taking place in any setting, whether at home, in an institution or any other place.
- The Care Act 2014 specifically lists the following key types of abuse that can affect "adults at risk":
  - Physical abuse
  - Domestic violence or abuse
  - Sexual abuse
  - Psychological or emotional abuse
  - Financial or material abuse

---

[1] The Children Act 1989 and 2004

[2] The Care Act 2014

Ravensbourne
University London

- o Modern slavery
- o Discriminatory abuse
- o Organisational or institutional abuse
- o Neglect or acts of omission
- o Self-neglect

Neglect
- Neglect involves failure to meet a person's basic physical, emotional, social or psychological needs, not supervising them sufficiently or keeping them safe
- Neglect is likely to diminish an individual's sense of self-worth and can impair their health and development, causing serious harm or death in some cases.

RUL's Safeguarding webpages provide detailed guidance on typical indicators of the types of abuse and neglect listed in these definitions. Further advice and signposting around support issues is also available on these pages.

Appendix B also provides more detailed information on these issues.

Regulated Activity
- Regulated activity is work that a barred person must not do (i.e., someone who is barred from working with children or Adults at Risk) and which normally requires an Enhanced DBS Check with a check against the relevant barred lists.
- Regulated activity with children is determined by a) the role activities and b) the setting in which those activities take place; regulated activity with adults is determined by the activities undertaken with the adult, irrespective of the setting.
- It is a criminal offence for a barred person to seek to work, or work in, activities from which they are barred. It is also a criminal offence for employers or voluntary organisations to knowingly employ a barred person in regulated activity.

1.3   Legal and regulatory context

This Policy and related arrangements are informed by a range of legislation and statutory guidance:
- The Children Act 1989 and 2004
- Working Together to Safeguard Children 2023
- The Care Act 2014
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Forced Marriage Act 2007
- The Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012)
- Rehabilitation of Offenders Act 1974

Ravensbourne
University London

- Modern Slavery Act 2015
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2024

The Designated Safeguarding Lead will monitor legislative and regulatory developments in this area and utilise guidance from national bodies, or others, on emerging safeguarding issues relating to children and adults at risk, and on emerging Prevent issues.

Ravensbourne
University London

2   Scope of Policy

2.1   This Policy applies to all University-controlled activities undertaken in the UK and overseas and to its staff, students, governors and third parties acting on behalf of the University.

External bodies who act on behalf of the University will maintain their own Safeguarding Policy arrangements because they are separate legal entities and, where necessary, the Designated Safeguarding Lead will liaise with their representatives on common issues (e.g., certain incidents, joint events) and may require assurance on their safeguarding arrangements.

The Policy does not apply to external bodies who may work alongside the University and/or on campus but do not deliver activities on behalf of the University.

2.2   Safeguarding considerations influence a broad range of University activities, including:
- students and staff, who may be under 18 or who meet the definition of an "adult at risk";
- children and adults at risk come into contact with the University through recruitment and outreach activities, fieldtrips, participation in research, voluntary activities on and off campus;

The Designated Safeguarding Lead will maintain a documented overview of typical safeguarding scenarios within the University to ensure adequate levels of policy and procedural coverage are in place.

2.3   RUL has other policies and procedures that operate alongside "safeguarding" which work in tandem, as appropriate. These include:

- Prevent Duty Policy and Procedures;
- Equality and Diversity Policies and procedures;
- Modern Slavery Policy/Statement;
- General Academic Regulations, including Admissions Policy (including Under 18s Admissions Policy), Fitness to Study Policy and Student Disciplinary Process;
- Staff Recruitment and Selection Policy;
- Staff Recruitment and Selection Guide for Hiring Managers;
- Data Protection Policy;
- Data Retention Policy;
- Staff Disciplinary Policy Statement;
- Staff Disciplinary Procedure.

Ravensbourne
University London

Links to these policies and other relevant policies can be found on [our safeguarding webpages.](#)

2.4   It is intended that this Policy will provide sufficient coverage for all University activities hence, to maximise consistency and compliance, academics and all departments should not develop their own procedures, unless a specific need can be demonstrated to the Designated Safeguarding Lead.

Ravensbourne
University London

3   Key Roles and Responsibilities

3.1   Governance responsibilities

RUL's Governing Body is ultimately responsible for the University's approach to Safeguarding, including Prevent, and has appointed a Board-level Champion who has corporate oversight of safeguarding approaches and meets with DSL to review in the University's Safeguarding and Prevent activities.

RUL's Audit Committee receives reports and updates on safeguarding performance and monitors the University's internal controls and compliance with legal duties, including Safeguarding and Prevent, which will include:

- obtaining assurance on the effectiveness and efficiency of key systems and procedures that manage key safeguarding risks.
- reviewing the Annual Reports on Safeguarding and Prevent activities including the Safeguarding Risk Register and Action Plan.
- monitoring serious Safeguarding and Prevent incidents (including any raised via Whistleblowing procedures and those which require reporting to regulators in line with "serious incident" reporting requirements), and providing feedback to the Governing Body, as necessary.

3.2   Executive responsibilities

As Accountable Officer, the Vice-Chancellor is ultimately accountable for the University's Safeguarding arrangements, including Prevent.
The Executive Team is responsible for approving the University's Safeguarding Policy and will:
- support the Executive Lead to ensure that safeguarding is afforded utmost priority at the most senior level within the institution;
- provide feedback to Executive Lead on the University's Safeguarding Policy;
- review the Annual Reports on Safeguarding and Prevent activities;
- monitor serious Safeguarding and Prevent incidents when a more serious incident occurs and ensure serious incidents are reported to the Governing Body, as necessary, and/or to regulators in line with "serious incident" reporting requirements. DSL will raise serious incidents with Executive.

3.3   Safeguarding Officer responsibilities

The key roles listed below are central to the leadership and management of Safeguarding activities across RUL's activities; further detailed information on their respective responsibilities is outlined at **Appendix A,** with contact details shown on the University's Safeguarding webpages:

Ravensbourne
University London

- the <u>Executive Lead</u>, currently held by RUL's Dean, acts as the Executive-level Lead for Safeguarding matters (including Prevent), liaising with Executive, Audit Committee and the Governing Body. The Lead will also ensure, alongside the DSL, the proper implementation of the Safeguarding Policy (including Prevent) and maintain strong relationships, where relevant with safeguarding and Prevent partner bodies. They will convene the regular Safeguarding Forum..

- the <u>Designated Safeguarding Lead</u> (DSL), held by the Head of Student Services, who leads and co-ordinates RUL's Safeguarding operational arrangements, including Prevent. The DSL receives and reviews all concerns and allegations and makes judgements about whether these should be referred externally to statutory authorities and/or the Police. The DSL will inform Executive of serious incidents, present Safeguarding Policy for review and create annual reporting of safeguarding actions.

- a network of <u>Designated Safeguarding Officers (DSO)</u>, who provide advice on safeguarding matters, including the correct reporting routes for raising concerns/allegations of suspected abuse or neglect (including radicalisation), and who will liaise with the Designated Safeguarding Lead, as necessary.

3.4   Other key role holders

- The <u>Head of Student Services</u>, in addition to their role as Designated Safeguarding Lead, will provide effective Student Support services that support students involved in Safeguarding and Prevent cases.

- The <u>Head of HR Operations</u> will design and manage safe recruitment arrangements for University staff (including University students who undertake paid roles within RUL), volunteers and Governors, including the administration of DBS checking procedures.

- If as a result of a safeguarding investigation staff are referred to a People and Culture policy or procedure they will always be referred to an independent Employee Assistance Programme providing confidential support.

- The <u>Head of Admissions</u>, will design and manage safe recruitment arrangements for University students at the on-boarding stage.

- <u>The Head of Student Recruitment & Marketing</u> will ensure there are appropriate safeguarding arrangements for outreach programmes and wider student recruitment activities. They will also work closely with DSL and People & Culture to ensure student ambassadors and other students who volunteer for, or are hired by the University have the necessary safeguarding training as part of their induction.

Ravensbourne
University London

- The <u>Head of Further Education & Apprenticeships</u> will ensure that appropriate safeguarding arrangements are in place within their areas of responsibility, and that relevant safeguarding requirements are implemented.
- The <u>Director of Innovation, Industry and Enterprise</u> will ensure that appropriate safeguarding arrangements are in place within Research, Engagement and Innovation projects, and that the safeguarding requirements of external research funders are implemented.
- The <u>Health, Safety and Environmental Manager</u> will ensure that arrangements are in place to manage health and safety risks for University activities involving under 18's and adults at risk.
- The <u>Facilities Manager</u> will provide an effective University Security Team, and related emergency response support for Safeguarding and Prevent related incidents.

The Executive Lead and Designated Safeguarding Lead will work with these role holders directly and through the Safeguarding Forum to assist them in discharging these responsibilities.

3.5   All staff

All RUL staff are required to:

- undertake Safeguarding and Prevent training and to utilise related guidance on these issues;
- discuss with their line manager any work activities that may require them to work with U18s and/or adults at risk, in order to assess whether these activities are eligible for a DBS check and, in particular, whether they constitute "regulated activity", which is eligible for the highest level of DBS clearance (i.e. an Enhanced DBS check with a check of the barred lists);
- take action (within the same working day) when they become aware of a concern and/or allegation, recording the information obtained and reporting this to a DSO, who will determine the next steps to take;
- maintain confidentiality about suspected or actual concerns and/or allegations and to co-operate with related internal or external investigations.

3.6   Safeguarding Forum

During the 2024/25 academic year, RUL will create a Safeguarding Forum, led by the Executive Lead and Designated Safeguarding Lead, with representatives from relevant departments. It will meet 3 times each year, with additional short-term sub-groups created, if necessary, to focus on specific topics.

The purpose of the Forum is to support RUL's managers to discuss and discharge their safeguarding duties by identifying activities that feature children and/or Adults at Risk, developing or revising Safeguarding procedures and training and sharing good practice to improve awareness and compliance.

Ravensbourne
University London

The work of the Forum will be summarised in the Annual Safeguarding Report submitted to the Executive Team and the Audit Committee.

Ravensbourne
University London

4 Implementing the Policy

4.1 Summary

RUL will seek to protect children and adults at risk via:

- a clear staff infrastructure, with defined roles and responsibilities, to support all Safeguarding activities (including Prevent) within the University;
- safe recruitment protocols for staff and students;
- appropriate protocols for the admission of students who are under 18;
- risk assessments and associated internal controls for University activities involving children and/or adults at risk;
- an appropriate safeguarding training programme, with clear guidance on how to recognise signs of abuse and neglect and how to report concerns;
- procedures for reporting and handling concerns and allegations about possible abuse and/or neglect of children or adults at risk;
- the maintenance of relevant safeguarding records and appropriate information sharing protocols;
- the co-ordination of all Safeguarding and Prevent activities and sharing of good practice within the University via the University's Safeguarding Forum, which will include representatives from across the University.

4.2 Safe Recruitment of Staff and Students

RUL's policy, when recruiting staff and students, is to:

- apply safe recruitment controls to those posts that are expected to have contact with U18s and Adults at Risk including assessment of suitable DBS checks;
- ensure, in line with DBS check eligibility criteria, that all staff and students involved in "regulated activity" and other activities with U18s or Adults at Risk, and all staff teaching on Further Education and Apprenticeship courses, are subject to an appropriate level of DBS check. Any cautions and/or convictions related to a child or an adult at risk will be referred to the DLS who will consider appropriate next actions and whether a barring referral needs to be made or the LADO informed.;
- renew staff and student DBS checks at periodic intervals where the need for DBS checks has been met;
- require staff and students, following commencement of their employment or study, to notify the University of any criminal convictions that may affect their ability to work with U18s or Adults at Risk.

See RUL Recruitment Policies and Procedures for more information including:

- Staff Recruitment and Selection Policy
- Staff Recruitment and Selection Guide for Hiring Managers

Ravensbourne
University London

- Student Admissions Policy – Section 5 of General Academic Regulations

4.3 Admission of students who are under 18

RUL students will usually have reached the age of 16 by the date of registration; students under 16 may be admitted in exceptional circumstances.

For all students who have not yet reached the age of 18 upon by the date of registration, RUL uses a specific Under 18s Admissions Policy.

The Designated Safeguarding Lead will work jointly with the Head of Admissions to monitor the numbers of students who are under 18 and will provide support and guidance as needed.

Following the Admissions Policy Contract of Care meetings will be arranged with all parents/guardians in advance of students joining Ravensbourne. All under 18 applicants will be reviewed from a safeguarding perspective.

4.4 Working safely to protect children and adults at risk

The Designated Safeguarding Lead (DSL) will work together with the Health, Safety and Environment Manager and relevant departments to:
- identify and manage risks to staff, students and others connected with the University community, who are under 18 or adults at risk, providing support and guidance as needed.
- to monitor the Risk Assessments and related controls applied for students who are under 18 and will provide support and guidance as needed.
- Ensure there is a Contract of Care is created with all Under 18 year old students and their parents or guardians in accordance with the admissions policy. An example document can be viewed here.
- monitor non-attendance of under 18 year old students with support from course leaders and student attendance staff. DSL, or their nominee, will contact all under 18 year olds on the day of non-attendance.
- RUL training and web guidance will clearly identify the reporting mechanisms for Safeguarding concerns and allegations so that members of the University community, including staff, students, partners and contractors know how these should be reported and escalated within the University;
- share RUL's good practice guidance for working with under 18 year old students and adults at risk with all course leaders.

Ravensbourne
University London

Guidance for under 18 year old students and their parents can be found on our safeguarding webpages.

Further information on our health and safety arrangements can be found on our website.

Ravensbourne
University London

5   Reporting concerns and allegations

5.1   RUL actively recognises its responsibility to respond when it becomes aware of a concern or allegation about the suspected abuse of any child or adult at risk (whether or not that person is a member of the University community), it has a duty to review the information and to take appropriate steps including, where necessary, making an external referral to statutory authorities and/or the Police.

RUL aims to ensure everyone in its community feels confident about raising concerns and allegations. The safeguarding approach therefore includes:
- clear internal referral routes to the Designated Safeguarding Lead (and Deputy Lead) including diagrams, for all safeguarding concerns and allegations ;
- safeguarding training to ensure staff are able to recognise signs of abuse and neglect, respond appropriately to safeguarding-related disclosures and know the expected internal referral routes;
- safeguarding webpages which provide supportive guidance, to reinforce training content and provide additional information;
- an alternative reporting route via RUL's Whistleblowing Policy arrangements, for those who are reluctant to reveal their identity (e.g., if they are fearful of repercussions);
- a commitment to take seriously any anonymous concerns or allegations made through the anonymous reporting process.

For concerns and allegations raised by individuals external to the University (e.g., Social Services, members of the public, etc), the University's Safeguarding webpages contains instructions on referral routes to the Safeguarding Team.

5.2   Raising concerns and allegations

The process for reporting concerns and/or allegations is as follows:
- for cases where there is an immediate risk of harm arising from possible abuse or neglect, **the concerned person should try to ensure the immediate safety and welfare of the under 18 or adult at risk**, by contacting Front of House, if you are on site, or the emergency services if required;
- the **concerned person should raise all concerns promptly, within 24 hours,** with a Designated Safeguarding Lead (or their Deputy) and **record the concern on the Safeguarding Report Form**[3].

Guidance for staff on handling situations where an individual discloses potential or actual abuse or neglect is available on the Safeguarding webpages and is incorporated in related training.

---

[3] https://app.onlinesurveys.jisc.ac.uk/s/rave/ravensbourne-safeguarding-report-form

Ravensbourne
University London

Staff and students can also seek guidance on how to report concerns from the University's network of Designated Safeguarding Officers.

Contact details for Safeguarding Team members are available on the [Ravensbourne Safeguarding webpages](#).

External parties wishing to raise a concern/allegation about a member of the University community or enquire about Safeguarding and/or Prevent arrangements should contact the Designated Safeguarding Lead (or Deputy) using the contact details provided on RUL's Safeguarding webpages.

Detailed information on reporting and referral mechanisms can be found on [RUL Safeguarding webpages](#)[4].

Alternative arrangements for concerns about Safeguarding Officers

If the concern relates to:	Please report the concern to:
Designated Safeguarding Officer	Designated Safeguarding Lead or Executive Lead
Designated Safeguarding Lead	Executive Lead
Executive Lead	The Vice-Chancellor, or via the University's whistleblowing arrangements.

Concerns about radicalisation (Prevent Duty)
All concerns or allegations about possible radicalisation should be referred to the Designated Safeguarding Lead immediately.

5.3   Confidentiality

Concerns and allegations will be handled in confidence by trained staff. However, since the individuals that raise concerns and allegations may be invited to participate in statutory safeguarding processes by Safeguarding authorities, complete confidentiality cannot be guaranteed. Further guidance on management of disclosures can be found on Ravensbourne safeguarding webpages.

There may be genuine reasons why an individual raising a concern or allegation may not feel able to disclose their identity; for such circumstances, the University has whistleblowing arrangements and arrangements for raising concerns anonymously:

Whistleblowing Arrangements

---

[4] https://www.ravensbourne.ac.uk/information/current-staff-and-students/concerns-and-complaints/safeguarding

Ravensbourne
University London

RUL's Whistleblowing Policy arrangements are designed to support and protect any person who wishes to raise a concern or allegation but who may fear repercussions or other negative consequences as a result of doing so.

Anonymous concerns and allegations

RUL recognises that individuals who would like to raise a concern or allegation may have valid reasons for wishing to remain anonymous. Concerns reported anonymously to the DSL/DSOs via the mechanisms outlined in Section 5.2 above will therefore be taken very seriously; however, the inability to follow-up with the concerned person often causes difficulties in progressing further investigations.

In such cases, we would recommend the use of RUL's confidential "whistleblowing" process, which ensures that the individual's identify is significantly restricted in any follow-up investigations.

5.4   Students on placement at external partners

Director of Innovation, Industry and Enterprise will ensure appropriate safeguarding arrangements are in place around work based learning. This includes risk assessments, placement visits, where appropriate, and approval of placement suitability through academic staff.

Students wishing to report any concerns or allegations whilst on placement will be expected to do so via the host organisation's safeguarding reporting arrangements. Hosts and students on placement will also be made aware to raise safeguarding concerns with the DSL. Should a student feel dissatisfied with the host organisation's response to concerns raised by them, they should report their dissatisfaction to the University's Designated Safeguarding Lead (or their Deputy).

Where concerns or allegations are made about students during work experience, placements, off-site study or visits to external partners, the external partner supervising the student activity is expected to receive and investigate the matter using their own safeguarding arrangements, making a referral to safeguarding authorities, if required, and should notify the University of the issue. This may result in further investigations by the University and possible disciplinary consequences.

Ravensbourne
University London

6   RUL's response to concerns and allegations

6.1   Initial response

The Designated Safeguarding Lead (or their Deputy) will review the information provided by the concerned person and assess whether this may constitute signs of actual or possible abuse or neglect. It may be necessary to gather more information to support this assessment, with case conferences convened as required, to manage actions required across the University.

The initial response will consider the provision of support to the person perceived to be at risk of abuse and, if they are a member of the University community, to the alleged perpetrator.

The Designated Safeguarding Lead will decide whether to refer the concern to the statutory safeguarding authorities and/or the Police and, if required, external referrals will be made. Subsequent advice from statutory authorities will be followed.

6.2   Review of reported concerns

The Designated Safeguarding Lead will maintain an overview of all reported concerns to identify possible connections between reported concerns and allegations.

This log of safeguarding concerns will be maintained within a secure online space. The incidents will be anonymously reflected in safeguarding reporting to Audit Committee. They will form the basis of the discussions at the Safeguarding Forum. Serious incidents will be reported to the Executive via DSL and Executive Lead in line with reporting duties

This review may also result in internal actions (e.g. provision of support) and/or a referral to statutory authorities if cumulative "low-level" concerns or concerning patterns of behaviour are identified.

6.3   Allegations about staff members

If, following a student complaint investigation relating to safeguarding-related allegation, it is determined that there are concerns regarding a member of staff's conduct related to safeguarding, the Dean and/or the Designated Safeguarding Lead will refer the matter to the People & Culture business partnering team.

Where appropriate, the Designated Safeguarding Lead, will ensure that any safeguarding concerns or allegations about staff members (including volunteers) in relation to under 18s are referred externally to the relevant Local Authority Designated Officer, as required by statutory guidance.

6.4   Suspension of staff during investigations

Ravensbourne
University London

Following initial inquiries, the Dean and the Designated Safeguarding Lead will assess whether to refer the matter to the People & Culture business partnering team to determine whether action needs to be taken under the [Staff Disciplinary Policy Statement](#) and the [Staff Disciplinary Procedure](#).

6.5   Suspension of students during investigations

Following initial inquiries, the Designated Safeguarding Lead will liaise with relevant senior staff to assess whether it is appropriate that students who have been reported as alleged perpetrators of abuse/neglect should be suspended during any internal or external investigations.

6.6   Disciplinary action

If, having followed the Staff Disciplinary Policy and the Staff Disciplinary Procedure, a staff member is found to have committed abuse or neglect in the course of their employment with the University this may result in a range of outcomes including staff dismissal.

In the case of the dismissal of a member of staff due to concerns that the individual poses a risk to children or vulnerable adults a member of the HR Business Partnering team will inform the DSL, who will consider appropriate actions and whether a barring referral should be made or the LADO informed

The University will follow the Student Disciplinary Process for any student who is found to have committed abuse or neglect in the course of their studies with the University; which may result in student expulsion.

6.7   Any request for a reference for a member of staff who has been disciplined or prosecuted for abuse or neglect in the course of their work activities shall in all cases be referred to People & Culture.

Similarly, academic reference requests for students in such circumstances will be directed to the Head of Registry, who may consult with the DSL.

6.8   Malicious reports

Disciplinary action may be taken against anyone found to have maliciously or vexatiously raised a concern or allegation, frivolously, in bad faith, maliciously, for personal gain or for revenge. This would not apply to individuals who have raised a genuine concern that proves to be unfounded. In the case of staff, such considerations fall under the Staff Disciplinary Policy and the Staff Disciplinary Procedure. In the case of students, the Student Disciplinary Process would be followed.

Ravensbourne
University London

7   Record Keeping and Information Sharing

7.1   Record Keeping

Safeguarding records (including those associated with Prevent) will be managed in line with data protection and other legal requirements and reflected in relevant departments record retention schedules.

These will include records associated with the University's safe recruitment procedures for staff and students and records of concerns and allegations reported to the University, including records of follow-up actions and external referrals made.

Records will be kept of all safeguarding concerns and incidents and their outcomes, with relevant information shared only on a need-to-know basis and in connection with regulatory reporting requirements. Record keeping arrangements for safeguarding concerns/allegations include:

- paper records of safeguarding concerns must be either stored away in a locked filing cabinet (with restricted access to that filing cabinet) or held securely electronically.
- retention of these records should be kept in line with the Ravensbourne Data Retention Policy.
- destruction of records should comply with the retention period. Paper records should be destroyed through shredding and disposed of as confidential waste.
- A record should be made of records destroyed.

7.2   Information Sharing

Information relating to certain concerns and allegations will be shared with external safeguarding authorities (e.g., Local Authorities) and the Police, as appropriate and with due regard to statutory and non-statutory guidance.

In cases where third party organisations are involved in safeguarding incidents, relevant information may also be shared with those bodies (e.g. University partners, research partners, etc) at the discretion of the DSL following discussion with Executive Lead. This should be to support or protect the safety of the student or staff member who may be at risk.

Ravensbourne
University London

8   Appendix A: Further information on the responsibilities of key role holders

Executive Lead
▪ To act as the Executive Lead for Safeguarding matters (including Prevent), liaising with the Executive Team, the Audit Committee and the Governing Body as necessary. ▪ To ensure the proper implementation of the Safeguarding Policy (including Prevent). ▪ To ensure appropriate resources are in place to support the Policy's implementation, including an appropriate staff structure. ▪ To maintain strong relationships with relevant Safeguarding and Prevent partner bodies (e.g., local statutory agencies, Police) alongside the DSL.
Designated Safeguarding Lead
▪ To lead and co-ordinate the University's Safeguarding arrangements, including Prevent arrangements, and the Safeguarding Forum; ▪ To maintain an up-to-date Safeguarding Policy and procedural infrastructure in line with legal duties, statutory guidance and regulatory requirements and to promote the Policy and related guidance and training for appropriate individuals. ▪ To ensure an appropriate audit regime is in place to monitor levels of policy and procedural compliance and to review and rectify any apparent non-compliance with Safeguarding policy. ▪ To maintain an overview of University activities involving under 18s and adults at risk and to ensure relevant safeguarding controls are in place to manage these activities. ▪ To assess relevant training needs for Safeguarding and Prevent and maintain an appropriate range of up-to-date training, including guidance on how to identify signs of abuse and neglect and how to raise concerns. ▪ To appoint and lead a network of Designated Safeguarding Officers ▪ To ensure, with the DSO Team, that relevant safeguarding concerns/allegations are referred externally to the relevant statutory authority and/or the Police, where there is suspected harm or possible harm to anyone under 18 years of age or an adult at risk; ▪ To work closely with the HR Business Partnering Team to review and progress actions in connection with staff concerns/allegations that are raised within the scope and applicability of the Whistleblowing Policy. ▪ To work closely with the HR Business Partnering Team on concerns/allegations that involve a member of University staff. ▪ To work closely with the relevant University manager or business area on concerns/allegations that involve a volunteer. ▪ To maintain an oversight of all concerns/allegations and to check for potential connections, so that an external referral can be made where the collective overview suggests it may be necessary; ▪ To maintain an oversight of related proceedings or externally led investigations participating in these as needed. ▪ To ensure GDPR compliant procedures are in place for reporting, escalating and recording safeguarding concerns and maintain a secure central record of these. External liaison

Ravensbourne
University London

- To maintain strong relationships with relevant Safeguarding and Prevent partner bodies (e.g., local statutory agencies, Police) and to ensure appropriate Information Sharing Agreements are in place with these bodies, where necessary.
- To represent RUL at the relevant local Prevent Forum, Channel Panel, Regional Partnership Boards, etc.

Designated Safeguarding Officers

- To assist in the promotion and implementation of the Safeguarding Policy and related procedures
- To ensure that reports of suspected abuse or allegations (including radicalisation) are routed appropriately to the Designated Safeguarding Lead (DSL) as necessary.
- To work closely with the University's DSL to support the University's response to concerns/allegations relating to safeguarding and Prevent;
- To participate, where necessary, in any related external investigations, and to ensure instructions and/or guidance from external statutory bodies regarding individual cases is implemented.
- To consider and highlight implications arising from concerns/allegations received, liaising with relevant University staff to initiate related improvement actions;
- To treat all safeguarding concerns and/or allegations in the strictest confidence.

Ravensbourne
University London

9   Appendix B: Types of Abuse and Neglect

This content should be considered alongside our webpages reviewing [signs of abuse and neglect](#) and [further support and advice around these issues](#).

Sources and further information is available through the following resources:

- NSPCC website: [Types of Abuse and Neglect](#)
- [Keeping Children Safe in Education 2024](#)
- Social Care Institute for Excellence: [Types and Indicators of Abuse affecting Adults](#)
- UK Government: [Modern Slavery Statutory Guidance](#)
- UK Government Dept. for Education: [Managing the Risk of Radicalisation in your Educational Setting](#)

Physical Abuse*
Physical abuse occurs when someone hurts another person on purpose. It can include hitting, slapping and punching, kicking, shaking, poisoning, burning and scalding, biting and scratching, breaking bones or drowning. It can also include making up the symptoms of an illness or causing a person to become unwell. Signs of physical abuse can include bruises, fractures, burns or scalds, bite marks and other scarring, the effects of poisoning (e.g. vomiting, drowsiness or seizures), breathing problems from drowning, suffocation or poisoning.
Sexual Abuse*
Sexual abuse: involves forcing or enticing someone to take part in sexual activities and may not necessarily involve violence and irrespective of whether the victim is aware of what is happening. Sexual abuse can involve: ➢ physical contact, including assault by penetration (for example rape or oral sex); ➢ non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing; ➢ non-contact activities, such as involving victims in watching sexual activities or creating or watching sexual images or footage, encouraging them to behave in sexually inappropriate ways, or grooming them in preparation for abuse; ➢ online activities, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by both males and females and also by children (i.e. U18s); the sexual abuse of children by other children is a specific safeguarding issue in educational establishments.
Child Sexual exploitation (CSE)
Child Sexual exploitation (CSE) is a type of sexual abuse which happens when a child is coerced, manipulated or deceived into sexual activity in exchange for things like gifts, drugs, money, status and affection. Children are often tricked into believing they're in

Ravensbourne
University London

a loving relationship so the sexual activity may appear consensual. They may trust their abuser and not understand that they are being abused. This is a type of abuse called grooming

Abusers often use violence and intimidation to frighten a child, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse or blackmail to control them. Exploited children may be made to 'find' or coerce others to join groups.

Although the age of consent is 16 years old, children who are 16 or 17 can be exploited and it is illegal to sexually exploit anyone under the age of 18.

Emotional or psychological abuse*

Emotional or psychological abuse occurs when perpetrators employ a range of personalised, psychological tactics to manipulate and frighten a person, distorting their thoughts and changing their sense of self in order to maintain control.

It involves the regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, weaken or frighten a person mentally and emotionally; and/or distort, confuse or influence a person's thoughts and actions within their everyday lives, changing their sense of self and harming their wellbeing.

Perpetrators use a wide range of hidden tactics to maintain control and brainwash their victim, presenting insults as a joke, gaslighting, and presenting different versions of events.

Neglect or acts of omission*

Neglect is the ongoing failure to meet someone's basic needs e.g., leaving them hungry or dirty, without proper clothing, shelter, supervision or health care. Neglect can have long term effects on a person's physical and mental wellbeing.

Neglect can be difficult to spot but there are generally four types of neglect.
➢ Physical neglect, where someone's needs for food, clothing or shelter, are not met or they aren't properly supervised or kept safe.
➢ Emotional neglect, where a person does not get the nurture and stimulation they need, often through ignoring, humiliating, intimidating or isolating them.
➢ Medical neglect, where someone isn't given proper health care, e.g., dental care or refusing/ignoring medical recommendations.
➢ Educational neglect, where a parent does not ensure their child is given an education.

Self neglect*

Self neglect occurs when an adult over 18 is unable, or unwilling, to care for their own essential needs or manage their personal affairs. It includes neglecting their own

personal hygiene, health or surroundings, refusing much-needed support and neglecting their home (e.g., obsessive hoarding).

Self neglect can sometimes indicate mental health difficulties or other illnesses and can be influenced by having been the victim of abuse or neglect in the past. It can have serious implications for the health and wellbeing of the person concerned and for the people who care for and support them.

Financial or Material Abuse (including "mate crime")*

Financial abuse involves having money or other possessions stolen (or "borrowed" without giving them back), being defrauded, being put under pressure in relation to money or other property or having money or property misused. It is a common type of abuse within domestic abuse, bullying situations or within "mate crime", where victims are targeted for "befriending" with a view to exploiting them. People can be forced or tricked into selling their home or assets without consent, making bad investments or changes to wills, property or inheritance.

Financial abuse is subtle and can be difficult to detect. It often takes place where there is an unequal balance of power and where the victim is more vulnerable (e.g., due to a learning disability, illness or being frail/elderly).

Domestic Abuse*

Domestic abuse can involve psychological, physical, sexual, financial or emotional abuse and generally occurs within the home environment. It includes any incident (or pattern of incidents) of controlling, coercive or threatening behaviour, violence or abuse, normally between family members, and can be linked with so called 'honour' - based violence, female genital mutilation and forced marriage.

Coercive/controlling behaviour is a core part of domestic violence and can include:
  ➢ acts of assault, threats, humiliation and intimidation
  ➢ harming, punishing, or frightening the person
  ➢ isolating the person from sources of support
  ➢ exploitation of resources or money
  ➢ preventing the person from escaping abuse
  ➢ regulating everyday behaviour.

Children (i.e. under 18s) can be victims of domestic abuse by witnessing the abuse of others at home and can suffer domestic abuse in their own intimate relationships (e.g., teenage relationship abuse).

Female Genital Mutilation (FGM)

FGM is when a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting' but has many other names. FGM can happen at different times in a girl or woman's life, including when a

Ravensbourne
University London

baby is new-born, during childhood or as a teenager, just before marriage and during pregnancy.

In the UK, it is a criminal offence and must be reported to the Police. Helping someone else perform FGM or helping a girl to perform FGM on herself are also both illegal in the UK, even if the girl is located outside the UK.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation is the term used to describe specific types of abuse where children under 18 are forced or manipulated into transporting drugs or money through "County Lines", working in cannabis factories, shoplifting or pickpocketing or even vehicle crime or threatening/committing serious violence to others.

CCE can affect girls and boys differently, depending on the intentions of the perpetrator, but research has shown that they are both likely to be at higher risk of sexual exploitation. Unexplained gifts or new possessions could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Perpetrators of CCE often threaten victims (and their families) with violence or entrap and coerce them into debt and may carry weapons, as a result, to protect themselves from others. Although children affected by CCE often commit crimes, their vulnerability as victims is not always recognised by adults and professionals.

Discriminatory abuse*

Discriminatory abuse may include unequal treatment based on any of the 'protected characteristics' under the Equality Act 2010 (e.g. their age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation). Hate crimes are often linked to this type of abuse.

Discriminatory abuse can include being subject to insults, verbal or physical bullying or harassment or other ill-treatment (including damage to property) due to these personal characteristics. Victims might be denied access to communication aids (e.g. not allowing access to an interpreter, signer or lip-reader, hearing aid, etc.) or other required medical aids or disability aids (e.g. wheelchair, walking frame, etc.), or be denied rights to healthcare, education, employment and criminal justice relating to a protected characteristic.

Organisational/institutional abuse*

Organisational/institutional abuse centres on poor professional practice arising from the structure, policies and procedures in an organisation, which can deny or restrict the dignity, privacy, choice, independence or fulfilment of adults at risk.

Ravensbourne
University London

Cases can involve the physical, psychological or financial abuse of service users, failure to meet their basic needs or act on allegations of abuse, the misuse of their medication, interference with correspondence/communications, or the inappropriate use of restraint. Cases can sometimes affect several people, such as in care homes or hospitals which may become run-down or overcrowded, with staff shortages, rigid regimes, poor quality catering, etc.

Modern Slavery*

Modern slavery encompasses slavery, servitude and forced or compulsory labour and includes human trafficking, where when victims are taken between countries or around a country so they can be exploited.

Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Traffickers often use grooming techniques to gain the person's trust, including their family or community. Physical, sexual and emotional violence are used to control victims of trafficking.

Children are often trafficked for child sexual exploitation, forced labour, criminal activity (such as pick pocketing or transporting drugs), benefit fraud, forced marriage or domestic servitude (such as cleaning, cooking and childcare). Trafficked children are also more likely to be physically and emotionally neglected.

Radicalisation

Children and adults can both be at risk of radicalisation into terrorism or extremism, when they begin to see violence and/or extreme methods as legitimate means to achieve certain goals associated with particular views and/or ideologies. People may become unhealthily involved in a range of radicalising causes, such as religious radicalisation, far right activity climate action or animal rights extremism.

Anyone can become radicalised although research shows that recruiters to extreme and terror groups deliberately target children under 18 and people with learning difficulties. There is no fixed pattern to how radicalisation may occur – it can take place face-to-face, via the internet and individuals can radicalise themselves.

*These types of abuse are classed as the "Ten Types of Abuse" under the Care Act 2014, which applies to adults over 18.

Ravensbourne
University London

10   Appendix C: Appropriate boundaries with under 18s and adults at risk

Maintaining appropriate boundaries with U18s and Adults at Risk

This Guidance Note sets out important guidelines for University staff and all other individuals acting on behalf of the University (e.g. volunteers, contractors, third party employees, temporary/interim staff members, consultants, etc.) to follow when working with anyone who is under 18 or may be an adults at risk. Adhering to these practical guidelines will help to maintain appropriate boundaries.

This Guide should be read in accordance with the University's Safeguarding Policy.

When working with under 18s and adults at risk, do:

- Treat all students with respect and dignity at all times, reflecting their age, background, culture and any special needs.
- Seek support from your line manager or Designated Safeguarding Officer if you are unsure about how best to interact with under 18s or adults at risk that you are dealing with.
- Familiarise yourself with the signs of abuse or neglect that could suggest a safeguarding concern is required.
- Challenge inappropriate actions and language from others and encourage others to be open about an attitude or behaviour they don't like.
- Plan interactions, as far as your role allows, that take place in the company of others to ensure that an allegation of improper behaviour does not arise.
- Ensure that, when conducting a 1-1 meeting, the room has a glass door where other employees can see you or (preferred option) you meet in a room shared by other employees. If this is not possible, make sure a colleague knows the location and ask them to call in at a specific point.
- Be consistent in applying the boundaries of your role when supporting/advising students and explain these to students, where required.
- Refer onto specialist services for support (e.g., exploring a student's mental health needs in depth, medical support, academic support, etc.).
- Be aware that others might misconstrue your speech and behaviour, however well-intended, and do your best to ensure that your intentions and boundaries are clear.
- Consider the balance needed between respecting people's right to privacy and taking any allegations or concerns of abuse seriously.

When working with under 18s and adults at risk, do not:

- Delay when responding to any concerns or allegations made by a child or Adult at Risk or reporting these to the Designated Safeguarding Lead (or Deputy DSL).

- Share your personal details (personal mobile number, personal email address, home address) to any student or parent.
- Share overly personal information (e.g. about your background, your history, your mental health, your family) with students, as this can easily blur the boundaries of your role and send a message to the student that you are their friend rather than a member of staff.
- Communicate with students using any personal social media accounts, sites or apps.
- Use your car (or a University vehicle) to transport a lone student – except in rare emergency situations, where permission has been granted by a supervisor or line manager.
- Physically touch or comfort a student (and, if they initiate physical contact for whatever reason, break away from this as soon as you are able and make a file note).
- Be overly familiar or take part in inappropriate behaviour or contact, whether physical, verbal or sexual (for example, play fights, insults, obscene gestures).
- Make threats or suggestive or offensive remarks, or lewd or sexually explicit comments.
- Form a relationship (including a platonic relationship) which constitutes an abuse of trust*.
- Act in a way that can be perceived as threatening or intrusive.
- Trivialise abuse or allow bullying or abusive activities (e.g., by downplaying an 'initiation ceremony').
- Take photographs or videos without appropriate consent.

*Personal relationships with U18s

Any adult in a "position of trust" who engages in any sexual activity with a person under 18 is committing a criminal offence under the Sexual Offences Act 2003.

The University considers that any staff member (including volunteers) who comes into contact with under 18s in the course of their employment is considered to be in a position of trust, whether or not they meet the strict legal definition. Any alleged sexual activity between anyone in a position of trust and an under 18 year old connected with the University will therefore be treated as a serious disciplinary matter and referred to the Police.

Ravensbourne
University London