



**UNIVERSITY
ACADEMY 92**
MANCHESTER

Safeguarding and Prevent Policy

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1.6

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| | | Regulations |
| | | Procedure |
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| <u>Area of UA92 business</u> | | Governance & Compliance |
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| Information Governance | | |
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| REVISION HISTORY | | | |
|-------------------------|-------------|--|---------------|
| Version | Date | Revision description/Summary of changes | Author |
| 1.1 | 30/06/2021 | Revised to ensure compliance with Prevent Duty guidance including new section (3.7) on training. Titles of staff updated. IHRA definition of anti-Semitism included. | Gareth Smith |
| 1.2 | 06/07/2021 | Updated the purpose to include DSLs and DSOs as the structure, updated 2.2 to include volunteers, added 2.7, updated 3.2.3 to include 'young people' instead of 'child', added 3.2.6, updated 3.4.1 to reflect DSL and DSO structure, added the UK Data Protection | Aaron Saxton |

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|-----|-------------|---|-------------------------|
| | | Act 2018 to 3.5.2, added 3.6.4 in relation to KCSIE, added 3.6.5 to cover internet/network filtering, added / updated 3.7.1 in relation to staff training, added 3.7.2 related to formal training / certifications, and added LADO contact details to 5.1.3. | |
| 1.3 | 01/03/2022 | Appendix added detailing procedure if safeguarding concern is raised as detailed in new 3.4.5 and 5.1.5 | Gareth Smith |
| 1.4 | Nov 2023 | <ol style="list-style-type: none"> 1. Removal of working with Local Safeguarding Children's Boards as majority of students are adults 2. Removal of statement around educating community about UA92 orphanages stance 3. Change of job roles e.g. DSL, deputy DSL 4. Including not only Trafford Safeguarding process but process of local authority where concerned person lives 5. Safeguarding files to be kept as part of student support team student records (rather than separate to any other student records) and any handwritten information to be scanned and stored digitally in these files (rather than stored in a locked cabinet) 6. Changes in training to reflect Home Office training now required as part of induction and video by DSL informing how to report concerns 7. Update to Trafford Council Safeguarding Contact Details 8. Addition of new Under-18s Policy and Parental Consent form (Appendix A) 9. Addition of flowcharts to visually illustrate the safeguarding process | Head of Student Support |
| 1.5 | February 24 | Updated job titles and DSO for People. | |
| 1.6 | April 25 | Updated job titles and contact information | Gareth Smith |

1. Purpose

1.1 University Academy 92 (UA92) is committed to protecting children and vulnerable adults from abuse, which is overseen by the Designated Safeguarding Lead (DSL). This policy has been written to guide UA92 in its statutory and moral obligation to protect children and vulnerable adults from harm, abuse, neglect, exploitation or discrimination and its statutory duty to have due regard to the need to prevent people from being drawn into terrorism. The DSL promotes and implements the Safeguarding and Prevent policy, ensuring that it is reviewed regularly and acted upon.

2. Scope

- 2.1 This policy applies to all UA92 staff and students. It also applies to contractors, volunteers and casual workers.
- 2.2 This policy sets out guidance on appropriate support and action to be taken by UA92 staff, students, partners, contractors and volunteers.
- 2.3 This policy also covers students who are working with children and vulnerable adults, either employed by UA92 e.g. as a student ambassador or on placement or as part of their course.
- 2.4 This policy outlines the responsibilities that employees and students have in relation to reporting suspected concerns about children and vulnerable adults.
- 2.5 The Counter-Terrorism and Security Act 2015 places an obligation on the institution “in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism.” This is known as the “Prevent Duty”.
- 2.6 The Office for Students (OfS) monitors what registered higher education providers, such as UA92, are doing to comply with the duty and mitigate any risks that may arise.
- 2.7 UA92 will work with appropriate local agencies to ensure that children and vulnerable adults are safeguarded through the effective operation of UA92’s safeguarding procedure.

3. Policy statements

3.1 Equality

- 3.1.1 Equality, freedom and treating all persons with dignity and respect are fundamental human rights. As such, UA92 is committed to making these central in all its work. UA92 is committed to the promotion of equality and will not unlawfully discriminate, or tolerate discrimination on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex and sexual orientation. This policy will operate in accordance with this.
- 3.1.2 UA92 has a zero-tolerance approach to antisemitism in all its forms and has adopted the IHRA definition of antisemitism that “Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

3.2 Overview

- 3.2.1 UA92 acknowledges that all individuals have the right to protection from abuse and a right to be safe in the activities that they participate in whilst on our campuses.
- 3.2.2 UA92 recognises its general duty of care to prevent harm arising from its acts or omissions and its obligations under health and safety legislation to ensure that staff, students and visitors are not exposed to risks resulting from the way it conducts its undertaking.
- 3.2.3 UA92 recognises that children and vulnerable adults may be particularly at risk of abuse, and this policy outlines a framework for preventing such abuse and a mechanism for reporting and dealing with suspected concerns and allegations.
- 3.2.4 UA92 recognises the need to comply with the Prevent duty in order to keep staff and students safe from being drawn into terrorism and this forms part of our obligations around safeguarding more broadly.
- 3.2.5 UA92 recognises the harm caused by institutional care for children (such as so-called ‘orphanages’) in a number of other countries, and the emerging evidence of children being trafficked to and from such institutions. We commit to ensure that we do not promote or engage in volunteering and/or visits to such institutions for children.
- 3.2.6 UA92 will advise parents/guardians of learners under 18 of the existence of the Under-18s Policy (see Appendix A), this policy and associated procedures.

3.3 Definitions

- 3.3.1 The term “children” refers to all those under the age of 18.

- 3.3.2 The term “vulnerable adults” refers to a person 18 or over who is or may be in need of community care services by reason of mental health or other disability, age or illness, and who is or may be unable to take care of themselves; or protect themselves against significant harm or exploitation.
- 3.3.3 UA92 has a legal responsibility to take appropriate safeguarding action in circumstances where there are signs and symptoms of, but not limited to, the following;
- Child abuse and neglect, including peer-to-peer abuse
 - Child sexual exploitation
 - Abuse of vulnerable adults
 - Female genital mutilation
 - Honour-based violence and forced marriage
 - Modern slavery
 - Radicalisation

3.4 Raising Concerns

- 3.4.1 If there is a safeguarding concern as detailed in section 3.3.3 then the concern should be immediately reported following the safeguarding process to UA92’s Designated Safeguarding Lead (DSL), the Head of Student Support, who will take appropriate action. The DSL will also be supported by the deputy Designated Safeguarding Lead, the Chief of Strategy and Student Life, who should be contacted in the DSL’s absence. If both the DSL and deputy DSL are not contactable, the Counselling and Mental Health Manager should be contacted. Please see flowchart (appendix B) for details of the process of reporting a safeguarding concern and who the Designated Safeguarding Officers are across UA92.
- 3.4.2 Concerns about the conduct of members of staff or students with regard to this policy should be taken to the DSL.
- 3.4.3 Any safeguarding concerns about the DSL and/or deputy DSL should be taken directly to UA92’s Chief Executive Officer.
- 3.4.5 The DSL (or other party as outlined above) follows the procedure outlined in appendix B.
- 3.4.6 In the case of a safeguarding concern in relation to an apprentice, the DSO for Apprentices (Disruptive Learning Operations Manager) may be informed, who should then report the concern immediately to the DSL.
- 3.4.7 In the case of a safeguarding concern related to an international student who is being supported by UA92 Global, the DSO for Global students (Manager of Academic and Support Services, UA92 Global) may be informed, who should then report the concern immediately to the DSL.

3.4.8 In the case of a safeguarding concern related to a UA92 colleague, the concern should be reported immediately to the DSL. If the People Team become aware of such a concern they should report it to the DSL.

3.5 Records

3.5.1 The DSL or nominee will follow the appropriate local authority's safeguarding procedure, depending on where the concerned person is resident. For students living at Academy Apartments, Trafford Borough Council's safeguarding procedure will be followed (see appendix C for more details).

3.5.2 Accurate records are essential to inform appropriate decision making and actions. Records should follow the guidance below:

- Records should be kept factual. Staff should note that there is a possibility that the information they record could be shared with others or used as evidence in court.
- The safeguarding file should be held as part of the Student Support team's student records. Any handwritten notes/documents should be scanned and a digital copy kept as part of the student file before handwritten documentation is disposed of confidentially.
- All records of discussions and telephone conversations should be documented.
- All conversations regarding a child or vulnerable adults are always held in private in line with the UK Data Protection Act 2018 that includes General Data Protection Regulation (GDPR).

3.6 Prevention

3.6.1 Where there are any organised activities on campus, UA92 will ensure that a risk assessment is carried out in order to promote the safety of vulnerable groups at risk.

3.6.2. Written consent may be required from parents/guardians with regards to activities involving children in relation to:

- presence of children on campus without a responsible adult;
- taking and publishing images of children; and/or
- the participation of children in research (overseen by Ethics Committee)

3.6.3 UA92 also ensures when recruiting staff and volunteers, where appropriate, a Disclosure and Barring Services (DBS) check at the necessary level is undertaken.

3.6.4 UA92 follows the Keeping Children Safe in Education (KCSIE) statutory guidance for providers on safer recruitment, policy updates and staff training.

3.6.5 UA92 internet and network traffic is monitored in accordance with the IT Usage Policy and in accordance with the Prevent Duty.

3.7 Training

- 3.7.1 UA92 will ensure that all members of staff with roles involving direct contact with children and/or vulnerable adults are appropriately trained and informed on the safeguarding processes as part of induction and on a regular basis thereafter.
- 3.7.2 UA92 employees with designated responsibility for child and vulnerable adult protection receive appropriate training and certification.
- 3.7.3 Prevent Awareness Training for identified staff will provide them with:
- an understanding of the factors that make people support terrorist ideologies or engage in terrorist-related activity
 - be sufficient to enable them to recognise vulnerability to being drawn into terrorism
 - be aware of what action to take in response – this is usually a clear understanding of how to report any concern

4. Under 18s

Please see appendix A for UA92's Under 18s Policy and Parental Consent Form.

All parents/guardians of a student who is under-18 at the start of their studies at UA92 will need to read and sign the policy and parental consent form.

5. Related Documentation

- Children's Act 1989
- Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014; and Working Together to Safeguard Children 2015.
- General Data Protection Regulation 2018
- The Counter-Terrorism and Security Act 2015
- Student Disciplinary Regulations and Procedure
- Lumos #HELPINGNOTHELPING
- Prevent duty guidance: for higher education institutions in England and Wales

6. Appendices

Appendix A: Under 18s Policy & Parental Consent Form

Appendix B : Procedure for Reporting a Safeguarding Concern: Flowcharts

Appendix C: Trafford Local Authority Safeguarding Processes

Appendix A: Under 18s Policy

UA92 is committed to equal opportunities in its admission of students; all applications are considered on their individual merits. Occasionally, UA92 admits students who are under the age of 18.

We treat all students as independent, mature individuals, and students who are under the age of 18 years will be treated in the same way. The usual academic and support services will be available to students who are under 18 years. All students, including those under the age of 18, are expected to have the necessary skills to study and live independently; admission to UA92 is offered on the understanding that all students will be able to adapt to living away from home and deal with the practicalities this involves.

However, we acknowledge that anyone under the age of 18 is legally a child and we recognise that students under the age of 18 may therefore have additional needs in relation to their support and welfare.

If a student is under the age of 18 when they register and begin their UA92 course, their parents or legal guardian must complete a parental consent form.

Parental Consent

UA92 is **not** able to take on the usual rights, responsibilities and authority that parents have in relation to a child, and it will **not** act *in loco parentis* in relation to students who are under the age of 18 years.

UA92 must receive consent from the student's parents or legal guardians, to acknowledge their acceptance of all of the arrangements set out in this document. This is a condition of admission to UA92 for all students who will be under 18 years of age at the time of registration. Parents or guardians should read through all policies set out in this document before completing the parental consent form as their acknowledgement.

Parents should complete the parental consent form only and send to admissions@ua92.ac.uk at their earliest convenience.

Admissions

The Admissions team are responsible for providing all applicants under the age of 18 with information relating to the expectations and responsibilities as set out in this document. The applicant's date of birth will be checked at the point of application alongside their passport prior to any unconditional offer being made. An unconditional offer can be made to a student under 18 but only with the provision that the offer cannot be confirmed or approved by the Admissions team until the parent or guardian has completed and signed the parental consent form.

Guidance for international applicants and parents/guardians

Where a student is from overseas and the parents remain outside the UK, we require details of a guardian for the student. The guardian must be resident in the UK and must be accessible to the student and to UA92 if the need should arise.

If they do not have a contact in the UK who can act as a guardian then they will need to make arrangements to obtain a guardian before completing the parental consent form. We will only be able to offer their child a place once they have provided details of a UK-based guardian.

The UK-based guardian should be an adult who can act *in loco parentis* (legally in the role of a parent) until the student reaches the age of 18, and whom UA92 can contact in the case of an emergency. Preferably this should be someone who is in or near to Manchester so that we or the student can contact them easily if this becomes necessary.

The UK-based guardian may be a relative or friend of your family living in the UK but the parent and/or guardian should discuss these responsibilities with them and ask for their consent before providing UA92 with their contact details.

If international students do not have a contact in the UK who is willing and able to act as a guardian then there are a number of agencies who will, for a fee, make guardianship arrangements. The Association of Educational Guardians for International Students (AEGIS) inspects and provides accreditation to guardianship organisations in the UK in line with current UK legislation.

UA92 expects the UK guardian to:

- (a) Be over the age of 25
- (b) Be a British Citizen or have UK settled status with no restrictions on their stay i.e. cannot be someone with a work or study visa
- (c) Cannot be a current UA92 student
- (d) Be resident in accommodation where the under-18 student could live in an emergency i.e. no studio flats or one-room rental properties
- (e) Must be willing to act as the student's legal guardian and take responsibility for their welfare and education while they are in the UK

Guardians should be aware of the importance of their role and should, therefore, be mature and able to respond to any issues that may arise during the student's studies. UA92 reserves the right to not recognise an appointed UK Guardian if they deem them not to be suitable.

Who is notified?

The Designated Safeguarding Lead (DSL) and Head of Department will be notified, prior to registration, of any student within their department who will be under the age

of 18 years on entry to UA92. The Student Support team will also be notified. For students in accommodation affiliated with UA92, the Student Experience Manager and Accommodation Officer will be notified of any students under the age of 18. Other staff may be notified at the discretion of the DSL.

Academic staff and other staff the student may interact with will not routinely be made aware of a student's age, and neither will other students. However, all students under the age of 18 will be required to wear a purple lanyard while on campus (students who are 18+ are required to wear a red lanyard).

Accommodation

Residential accommodation offered by UA92 is generally intended for the use of adults. Under 18s will only be permitted to stay in UA92 accommodation with the permission of their parents/guardians.

Emergencies

It is particularly important that students under the age of 18 or their parents/guardians provide emergency contact details prior to the student's arrival at UA92. They must also inform UA92 immediately if there are any changes to the contact details provided. These should be sent to registry@ua92.ac.uk and the Designated Safeguarding Lead (contact details in Appendix B).

If a medical emergency arises and it is not possible for UA92 to contact the named individuals, a senior member of UA92 will, on behalf of the student's parents or guardians, give such consent to treatment as is in the best interests of the student. By signing the parental consent form, the student's parents or guardians indicate their consent to this.

Students who are under 18 should ensure that they are registered with a GP if they are living away from home. If they require support with this they can contact UA92's Student Support team via email at well-being@ua92.ac.uk.

Parents or guardians are responsible for ensuring that UA92 has been informed of any special needs or requirements of students under the age of 18 e.g. if they have a disability or other support needs at the point of application.

Field trips

Some of our courses may involve compulsory or optional field trips, excursions or other periods of study away from UA92. We are not able to take any additional responsibility for a student who is under the age of 18 years in relation to these activities. Unless indicated otherwise, parents or guardians give consent for the student to take part in these activities on that basis, by signing the parental consent form.

Holding Office

Students who are under 18 years are not allowed to hold office. For example, they may not be secretary or treasurer to a sports club or other student society. For this reason, the Head of Sport92 will be informed of any students under the age of 18.

Parental Involvement

We treat all students as independent individuals and it is our usual policy that we deal with students (whom we have a contractual relationship with) and not with parents, guardians or other third parties. This approach will also apply to students who are under the age of 18 years. UA92 will therefore correspond with students, not parents, on all matters relating to their studies with us. This means that UA92 is not able to provide parents or guardians with information regarding the student's progress, results or any other personal circumstance unless the student has given specific consent.

Contracts

As a general rule, those under the age of 18 are unable to enter into legal contracts. Where contracts are required, e.g. for tuition fees or accommodation, UA92 requires parents or guardians to honour all obligations under any contracts with UA92 that the student enters into prior to their 18th birthday. By signing the parental consent form, the parent or guardian agrees to this. Failure to pay debts due to UA92 could result in the student's studies being suspended.

Relationships with staff

UA92 prohibits all romantic relationships between staff and students. In addition, under the Sexual Offences (Amendment) Act 2000, it is a criminal offence for any person in a position of trust (which may include members of UA92 staff) to engage in sexual activity with someone who is under 18 years.

Reports of safeguarding concerns

Safeguarding concerns should be reported to the Designated Safeguarding Lead in the same way as any other safeguarding concern. Staff should note, however, that in the case of suspected abuse of a student who is under 18, the DSL should be informed as a matter of urgency before the student leaves campus (if they are on campus), to ensure necessary steps are taken and appropriate authorities have been contacted prior to them returning to an environment where they are at potential risk of harm.

Under 18s Parental Consent Form

This form needs to be completed by the **parent/guardian** of the applicant. Please note that we are unable to provide any unconditional offer of study at UA92 until we have received a completed form containing all required information.

The information that you (the parent/guardian) provide in this form will be used solely for the purpose of confirming that you accept the arrangements set out in the Under-18s Policy. Your personal data will be held in accordance with the General Data Protection Regulation and processed as outlined in UA92's Privacy Policy, which can be accessed [here](#).

| | |
|---|--|
| Applicant First Name: | |
| Applicant Surname: | |
| UCAS ID number: This is the 10 digit number that applicants are issued by UCAS when they make their application | |
| Course applied for e.g. Business Studies: | |
| Will the applicant be under the age of 16 at the start date of their course? | |
| According to their passport, which nationality does the applicant hold? If they hold joint nationality and one of those is British or Irish (Republic of Ireland) then please write British or Irish | |

I confirm that I have read, understood and agree to UA92's Under 18s policy as stipulated in Appendix A of the UA92 Safeguarding and Prevent Policy, and that I understand the nature of the relationship between the parents/guardians, University Academy 92 (UA92) and it's students under the age of 18.

| | |
|--|--|
| Signatory Full Name (as in your passport): | |
| Date: | |
| Relationship to Student e.g. parent or guardian: | |

If you are a guardian you must provide us with legal documentation to confirm that you are the legal guardian of the applicant e.g. a letter from a solicitor or an affidavit. Please also provide documentation to confirm your identity e.g. passport or utility bill dated within the last 3 months. This information should be sent to admissions@ua92.ac.uk with a copy of this form. Without this documentation we are unable to process your application.

| | |
|--|--|
| Will you be living outside of the UK when the applicant starts their course? | |
|--|--|

If you live outside of the UK and the applicant is less than 18 years of age, UA92 requires you to provide the contact details of a nominated guardian **based in the UK**. The applicant will need to have a nominated guardian in the UK from the point at which they commence their studies at the University to their 18th birthday.

The guardian must:

- (a) Be over the age of 25

- (b) Reside in the UK and be a British Citizen or have UK settled status with no restrictions on their stay i.e. cannot be someone with a work or study visa
- (c) Not be a current UA92 student
- (d) Be resident in accommodation where the under-18 student could live in an emergency i.e. not a studio flat or one-room rental property
- (e) Be willing to act as the student's legal guardian and take responsibility for their welfare and education while they are in the UK

| | |
|--------------------------|--|
| Name of UK Guardian: | |
| UK Address: | |
| UK Phone Number: | |
| Relationship to Student: | |
| Email Address: | |
| Signature of Guardian: | |

Please provide documentation to confirm the identity of the UK based nominated guardian of the applicant e.g. passport or utility bill dated within the last 3 months. You should email this to admissions@ua92.ac.uk with this consent form. Without this documentation we are unable to process your application.

Declaration:

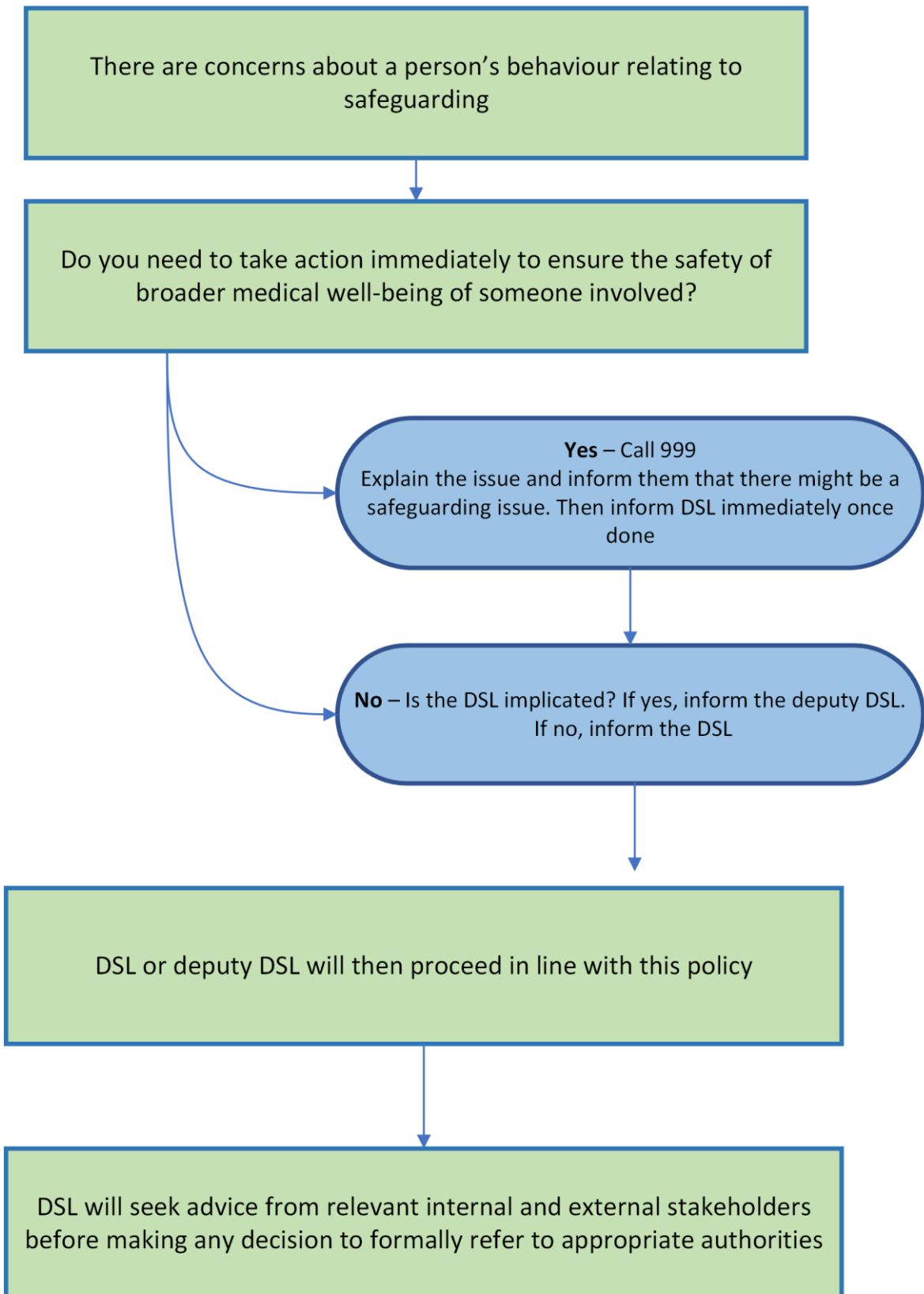
I hereby confirm that I have read and accept the conditions outlined in the Under-18s Policy document. I accept that UA92 will **not** act in loco parentis should the above applicant be admitted to UA92. I consent to the applicant applying to UA92, making their own arrangements for accommodation, and travelling to UA92, which is in the United Kingdom.

| | |
|----------------------------|--|
| First Name: | |
| Surname: | |
| Parent/Guardian Signature: | |

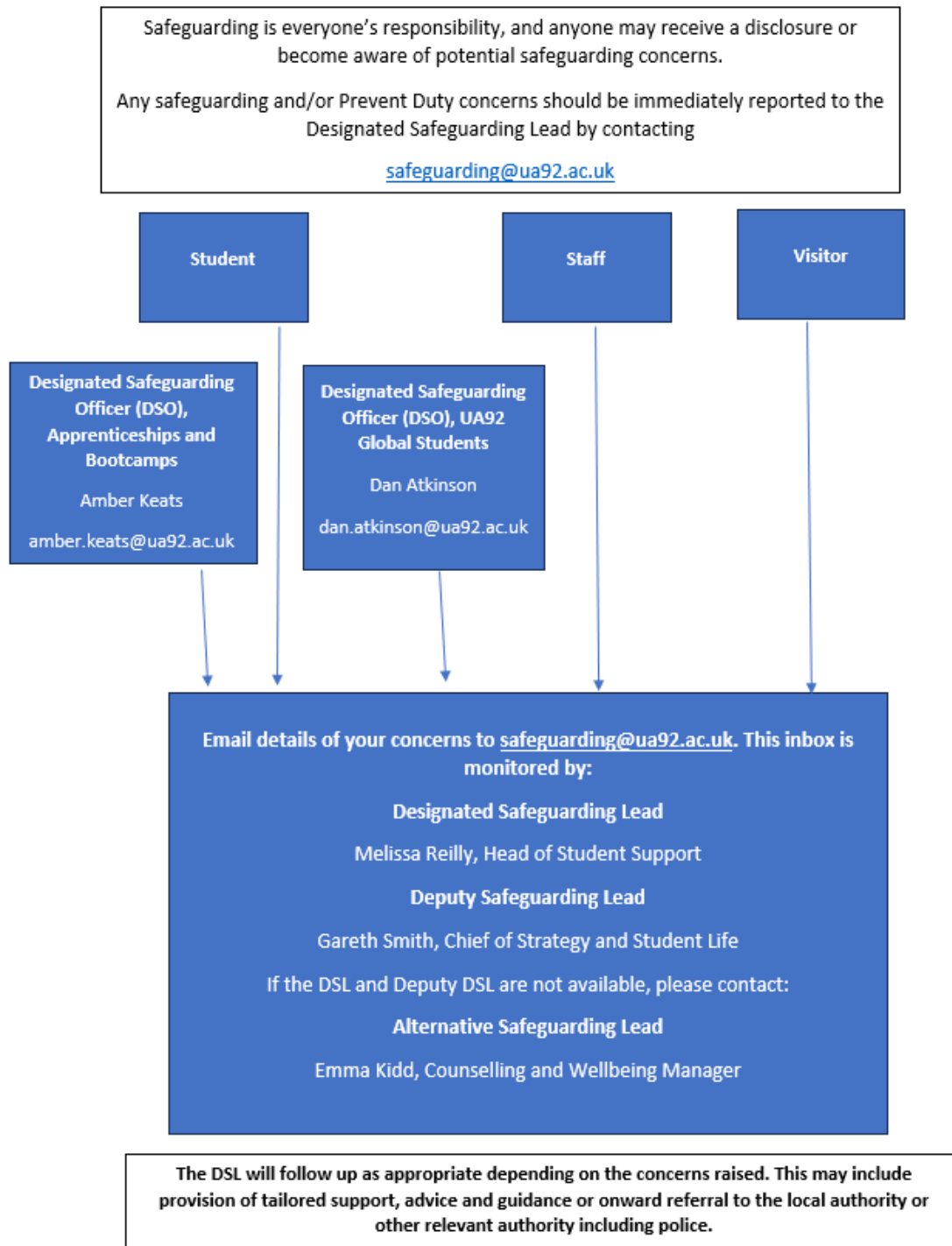
Please send a copy of this completed consent form to admissions@ua92.ac.uk.

If you are a guardian you must also email admissions@ua92.ac.uk providing us with legal documentation to confirm that you are the legal guardian of the applicant e.g. a letter from a solicitor or an affidavit. Please also provide documentation to confirm your identity e.g. passport or utility bill dated within the last 3 months. Without this documentation we are unable to process your application.

Procedure re safeguarding concerns to follow as outlined in section 3.4



Appendix B : Reporting a safeguarding concern: flowchart



Trafford Local Authority Safeguarding Processes

Trafford Borough Council's Children's First Response (formally MARAT: Multi Agency Referral and Assessment Team) is Trafford's single point of contact for anyone to report concerns, request advice and share information about a **child and/or family**. Their contact details can be accessed via the following link:
<https://www.trafforddirectory.co.uk/kb5/trafford/fsd/service.page?id=ZCYE1Cn8vcM&familychannel=2600-4>

Trafford Borough Council's procedure for reporting concerns about an **adult** can be accessed via the following link:
<https://www.trafforddirectory.co.uk/kb5/trafford/fsd/advice.page?id=xlKB9Y8bCol>
<https://www.traffordsafeguardingpartnership.org.uk/Safeguarding-Adults/Are-you-worried-about-an-adult.aspx>

Trafford Borough Council's Safeguarding Teams can be contacted using the following contact details:

Children's First Response (formerly MARAT):

Telephone: 0161 912 5125 8.30am to 4.30pm
 0161 912 2020 Out of Hours
E-mail: firstresponse@trafford.gov.uk (Children)

Adults Safeguarding Team:

Telephone: 0161 912 5135 8.30am to 4.30pm
E-mail: AdultSafeguardinghub@trafford.gov.uk

Adults Professional Safeguarding Referral Form:
<https://myway.trafford.gov.uk/web/portal/pages/profconcern#h1>

Trafford Local Authority Designated Officer (LADO):

Telephone: 0161 912 5024
E-mail: LADO@trafford.gov.uk