UCEN Manchester Safeguarding Policy

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UCEN Manchester: Safeguarding Policy

The purpose of this policy is to outline UCEN Manchester's commitment to safeguarding adult learners. On those occasions when UCEN Manchester staff are working with young people aged under 18, then The Manchester College's Safeguarding Policy should be referenced in line with local procedures for child protection.   At the same time, any staff teaching on courses that are aligned to the Education Inspection Framework, should also refer to The Manchester College's Safeguarding Policy.

Background

1.1 Safeguarding is the term used for protecting people from maltreatment and keeping individuals safe and protected from harm, abuse, and neglect. (Appendix 1 provides categories of abuse)

Important principles:

• Young people and vulnerable adults have a right to be safe and should be protected from all forms of abuse

• Safeguarding is everyone's responsibility

• It is better to offer help as early as possible, before issues escalate and risk causing more harm

• Working together with colleagues and external agencies across Greater Manchester provides the best support

1.2 As a higher education provider, in most cases, UCEN Manchester students are adults with the mental and legal capacity to make their own decisions and our policies and practice reflect this

1.3 However, whilst in most instances UCEN Manchester does not act in the place of parents, it has a duty of care to children and vulnerable adults as well as to staff, parents, and carers of those children and vulnerable adults that we work with.

1.4 Therefore, as a responsible higher education provider UCEN Manchester, will seek to limit the risks of harm to those under 18 engaging in our activities, particularly those who may not be able to look after their own welfare, and will respond effectively if any concerns are reported or raised.

2. Principles of Adult Safeguarding

We recognise that some students are living independently for the first time but that, as adults, students are primarily responsible for taking care of their own welfare. As UCEN Manchester is an adult learning environment it adopts the six principles of Adult Safeguarding:

2.1 Empowerment – people, including young people, being supported, and encouraged to make their own decisions and informed consent.

2.2 Prevention – having procedures that recognise that it is better to act before harm occurs. This is supported by providing training to relevant staff so that staff involved in activities with children and adults in vulnerable situations receive clear and simple information about what abuse is, how to recognise the signs and what they can do to help.

2.3 Risk Assessment – UCEN Manchester requires proactive risk assessment of on-going activities to identify those activities where participants are or are likely to be vulnerable and therefore safeguarding requirements need to be anticipated and considered.

2.4 Proportionality – To ensure that responses to concerns/alerts are proportional to the assessed risk and the nature of the allegation/concern. Proportional decisions need to consider the principles of empowerment and protection. Where a person lacks the mental capacity, any decisions made on their behalf must be made in the person's "best interests" and be least restrictive to their rights and freedoms.

2.5 Protection – support and representation for those in greatest need. For adults in vulnerable situations this may mean supporting the adult to report abuse or neglect and enabling them to make decisions about whether and how to participate in the safeguarding process to the extent that they choose

2.6 Partnership – by working with the Safeguarding Boards for adults and children in Manchester and with our placement partners, to do what is within our control to prevent, detect and report neglect and abuse. Information sharing with partners to be in accordance with legislation, agreed protocols and where possible consent so that staff, students, and children are assured UCEN Manchester will treat any personal and sensitive information in confidence, only sharing what is helpful and necessary.

2.7 Accountability – ensuring accountability and transparency in delivering safeguarding, so that everyone understands the roles including the children and adults that the policy is aiming to protect.

Understanding 'capacity':

In line with The Care Act 2014, capacity is assumed unless known otherwise.

2.8 Students with additional needs for care or support - some students need to access additional advice and support for example to transition from local authority care or to adjust for long term health conditions or disabilities. UCEN Manchester does not automatically assume that such students are any less able than other students to make their own decisions. Our Student Services, Future U, have policies and procedures to ensure that staff work to the adult safeguarding principles, are aware of relevant safeguarding risks and have reporting arrangements should any concerns arise.

2.9 Students in distress – UCEN Manchester is committed to implementing the recommendations from Universities UK and Papyrus to ensure we are proactive in preventing student suicides. (Appendix 2). Occasionally, a student's mental or physical health means that they do not have capacity to take adequate care of their own welfare. To manage the risks that students in distress may pose to themselves and others, Future U Student Services can legally contact health professionals in the community and/or the student's next of kin.

3. Purpose

The purpose of UCEN Manchester's Safeguarding framework is to provide arrangements that ensure:

3.1 UCEN Manchester will take all safeguarding concerns including suspicions and allegations of exploitation, harm, or abuse (including radicalisation) seriously and will report concerns promptly.

3.2 In line with the LTE Group DBS Policy, UCEN Manchester has robust processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. We are committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate. DBS Policy (sharepoint.com)

3.3 safeguarding referrals will be made based on identified and considered risk. For example, students may be encouraged to seek support from PAM Assist, Future U Student Services or to the relevant statutory authority.

3.4 in a placement or work-based learning environment (such as a professional or clinical setting) a member of staff or student should normally report any safeguarding concern in the first instance to the Safeguarding Officer of the provider, or employer. If the student or staff member feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer, or they do not feel they have had a satisfactory response, they should refer directly to UCEN Manchester's Designated Safeguarding Officer.

4. Objectives

The objectives of the Safeguarding Policy are to ensure:

4.1 UCEN Manchester staff work in a manner to protect children or young people (defined as individuals who are under the age of eighteen years) involved in outreach and recruitment activities and adults (which may include students) who are vulnerable to harm and who are not able to take steps themselves to prevent that harm

4.2 that when children and vulnerable adults are engaging in UCEN Manchester activities, they can participate in a safe and secure environment and their parents/carers can have confidence in UCEN Manchester

4.3 the roles and responsibilities of UCEN Manchester staff are clear in relation to responding to reported incidents of harm or threats of harm to children or vulnerable adults

4.4 there are clear arrangements for reporting concerns and liaising with external authorities where action, advice or support is required to protect children and assist vulnerable adults to secure their safety

4.5 UCEN Manchester is aware of and follows good practice in safeguarding children and vulnerable adults by alerting concerns, referring issues to and liaising with appropriate authorities, and recording and monitoring decisions and actions

5. Scope

The policy will apply:

5.1 to all employees and students of UCEN Manchester and all activities. This applies to all activities controlled or managed by UCEN Manchester that are aimed at children or vulnerable adults, whether they take place on our premises or elsewhere.

5.2 to staff members who are obliged to raise and escalate any concerns that arise about the wellbeing of children or vulnerable adults during UCEN Manchester activities.

5.3 to third party UCEN Manchester activities (such as placement or events) and staff supervising the UCEN Manchester involvement in the activity should satisfy themselves that the safeguarding arrangements are adequate for the activity

6. Roles and Responsibilities

UCEN Manchester has designated the following roles for coordinating the implementation of the Safeguarding Policy and procedures including ensuring that staff and relevant students understand their role and limitations

6.1 The **Strategic Leads for Safeguarding and Welfare** Vice Dean. They are responsible for the UCEN Manchester's strategy on safeguarding and oversight of the policy. They are accountable for UCEN Manchester's safeguarding practice.

Their responsibilities are to ensure:

- staff and appropriate committee structure is in place to fulfil safeguarding responsibilities.
- safeguarding is prioritised at the most senior level within the institution.
- procedures are in place for: managing breach of safeguarding allegations against students and staff; whistle-blowing and safe recruitment practices.
- records concerning safeguarding are stored and shared appropriately.
- monitoring review systems are in place to incorporate new guidance and legislation into UCEN Manchester policy and to test out existing systems.

6.2 The **Responsible Managers for Safeguarding and Welfare** are the Director of Student Experience and Engagement and Head of Student Support, Advice and Wellbeing, part of Future U Student Services, who lead on implementation of safeguarding systems across UCEN Manchester, working with the Designated Safeguarding Officers who from academic year 23/24 will be known to students and staff as Wellbeing Officers.

The responsibilities of the Responsible Managers are to:

- oversee the training and supervision of the Wellbeing Officers.
- develop and implement procedures, practice and guidance for safeguarding that address the areas of risk and are fit for purpose
- support the delivery of the staff awareness raising programme, ensuring staff in UCEN Manchester are aware of the policy and procedure relevant to their faculty
- implement the monitoring review systems
- as appropriate, create links with relevant community services for safeguarding children and vulnerable adults

6.4 **Wellbeing Officers:**

The responsibilities of Wellbeing Officers are to:

- be a contact point for staff and students to raise issues about possible risk or harm to children or vulnerable adults
- liaise with the Responsible Manager (Operational) regarding on-going investigations where necessary.
- provide support, advice, and expertise on safeguarding issues relevant to the activities of UCEN Manchester.
- refresh their own training and that of others where significant changes are made to policy/legislation impacting on UCEN Manchester activities
- manage and escalate referrals keeping detailed, accurate, secure and written records of any concerns raised and their outcomes if known.
- refer cases of suspected abuse to other agencies and/or the Local Authority Designated Safeguarding Officer, where required; support staff who make referrals to the local authority
- refer cases where a crime may have been committed to the Police as required
- refer cases to the Channel programme, via Principalship where there is a radicalisation concern as required; support staff who make a referral to the Channel programme

7. Reporting and Recording Safeguarding Incidents

7.1 All safeguarding concerns need to be reported to the Future U Student Support Team face to face on campus; by email using wellbeing@ucenmanchester.ac.uk, or by completing the online form from the website. Incidents reported will continue to be recorded using the CPOMS platform by the Future U Team.

7.2 As far as possible, staff should adhere to the following guidance when a disclosure is made:

- Take what you are being told seriously

- Listen and do not interrupt

- Reassure students they have done the right thing

- Tell them you will have to pass the information on, who to and why

7.3 All staff should aim to avoid the following practices when taking a disclosure directly from students:

- Investigating further or probing

- Looking shocked, distasteful, judgmental

- Do not speculate/pass an opinion about the disclosure

- Do not make negative comments

- Do not promise to keep it a secret/confidential

Further support for staff is referenced in the What to Do When Guide which is updated regularly.

7.4 Once staff have shared a disclosure, the Wellbeing Officer will record on ProMonitor that this has been actioned. The details of the intervention will be recorded on CPOMS but staff should be aware that they will not have access as this is allocated on a need to know basis.

Appendix 1: Categories of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Self-Neglect - is characterised by an inability to meet one's own basic needs and is an increasingly common problem. It is important to differentiate self-neglect as intentional or non-intentional. The complexity and multidimensional nature of self-neglect means it is difficult to detect and diagnose. Accurate, comprehensive assessments, including capacity and risk assessment and a multidisciplinary approach are critical in managing these cases

Appendix 2: Trusted Contacts – implementation of UUK recommendations

Following on from the announcement from Universities UK in October 2022, in response to better supporting students with their mental health, it is the intention of UCEN Manchester to fully implement the recommendations they have proposed in partnership with PAPYRUS Prevention of Young Suicide. The recommendations include:

- Making it mandatory for students to give a trusted contact at registration, being clear that the contact does not have to be a parent, and starting a conversation about when and how these contacts might be involved

- Having check-ins at the start of each academic year for students to update this information and making it easy to update the contact if circumstances change

- Ensuring that universities review their suicide prevention plans and policies to keep students safe, identifying students of concern, assessing risk, working in close partnership with NHS services and, where there are serious concerns, initiating conversations about involving trusted contacts

- Making clear that, although always preferable to gain agreement from the student, where there are serious concerns about a student's safety or mental health, universities can decide to involve trusted contacts without agreement. Such decisions should always be made in the student's interests, be taken by appropriately qualified staff, supported by senior leadership, be based on a risk assessment establishing the grounds for serious concern and be properly governed and recorded.

Actions taken to date toward implementation of recommendations:

1) Legality scoped from GDPR perspective with Emily Rampling, Assistant Data Protection Officer
2) System functionality scoped with Darren Hamlin, Head of Business Intelligence and Development

Update:

- Collection of trusted contact information should ideally be captured at initial enrolment and from a process perspective it can be captured on the Apply Portal for students to update independently
- Trusted Contacts should consent to this – unclear on how consent will be given; Annette McCone to follow up with UUK and Papyrus as to how the suggest this can be overcome based on experiences of other HEIs.
- A published UCEN policy on this initiative is recommended (currently included in 2.9 of Safeguarding Policy)
- Separate available privacy notice would be useful/recommended (not in place)
- Storing trusted contacts information in an EBS field is preferred. Darren Hamlin has confirmed this can happen and students should be able to update independently on the Apply Portal. Personal Tutors can use EBS to update.
- Ensuring that trusted contact info is kept up-to-date/revisited on a regular – recommended that Personal Tutors raise at start of each term
- It's also important that any contact made with trusted contacts is documented/logged – recommended this would be on CPOMS.

33 Adding an Incident

To add a new incident to the system click on the **'Add Incident'** button, available to the top right of your dashboard.
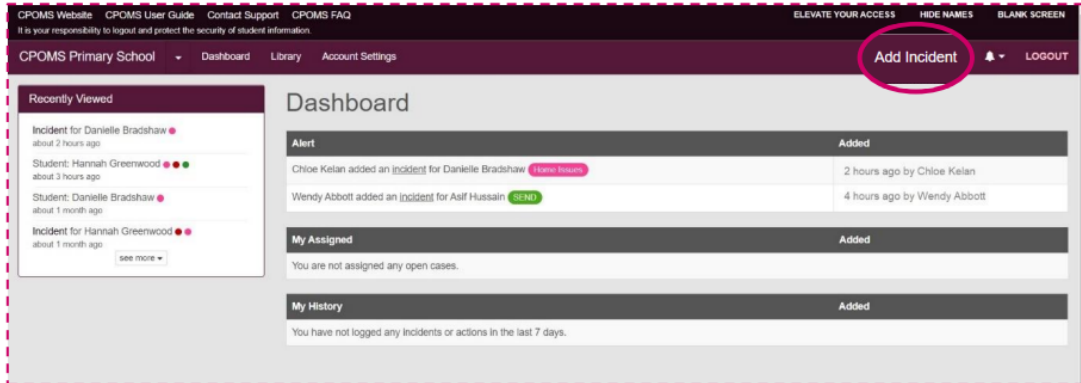
You will then be taken to the 'Add Incident' form, where you can fill in all of the details about the incident.

© **Categories**

Once you have filled in all of the details about the incident, you need to select at least one category to assign it to. If there is an overlap you may select more than one.

© **Linked student(s)**

You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also click to monitor the linked student under the same category(s) if necessary and choose whether to share any documents you attach to the incident to their profile(s) as well.

© **Maps**

The 'Maps' feature allows you to apply numbered markers to a map image to support your incident text. This will default to our 'Body Map'.

© **Date/Time**

Following this you can select a date and time. These will both default to the current date and time, however if you wish to change it to when the incident actually occurred you can do so here.

© **Status**

You may set the 'Status' of the incident to 'Active' or 'Closed'.

© **Assign to**

You may also assign an incident to a specific staff member *(Key Holders Only)* if they will be dealing with it, by selecting their name in the 'Assign to' field. *The chosen user will then receive an email notification to alert them to this and the incident will appear in the 'My Assigned' area of their dashboard until the incident status changes to 'Closed'*

© **Files**

If you would like to attach a file/ document to support the incident *e.g. a social services letter, previous school case notes, or meeting minutes etc.* you can do so at this point. Simply click to browse and find the relevant document on your machine and add or drag a file from one of your folders into the area to upload.

© **Alert Staff Members**

Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members for you to select from. Alternatively you can select to alert an entire alert group by choosing the relevant alert group button(s) available beneath the individual alert option.

© **Agency Involved**

You can also add any agency names to the incident to make others aware of which agencies are involved with this incident/ pupil.

Once all of the above has been done, you must select the **'Add Incident'** button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

34.3 Contact Support

Lastly we have the **Contact Support** function, to the left-hand side of your screen. You can choose to contact our Customer Support Team from within the system saving you precious time.   Simply click on the 'Contact Support' button, enter your message and submit it. This will then be sent directly to our CPOMS helpdesk where someone will carry out your request as soon as possible and notify you once it has been completed.

> *N.B Please note, any official requests are required in writing, therefore if you contact us via telephone you will often be referred to the Contact Support function.*