HARTPURY

Child Protection & Safeguarding Policy & Procedure

Approval & Review Cycle		
Policy Owner/Reviewer	Chief People Officer	September 2026
Approved By	Corporation	September 2026
Interim-Review	No	-
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1. General Policy Statement

1.1 Hartpury recognises that it has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all students receiving education and training at Hartpury. Hartpury is fully committed to the wellbeing of students, young people and adults at risk and expects all students, staff, volunteers and stakeholders to endorse and practice this commitment at all times. Hartpury actively promotes the positive welfare of all its staff and students.

1.2 Safeguarding and promoting the welfare of children/young people and adults at risk is everybody's responsibility. Everyone who comes into contact with young people and their families/carers has a role to play. Our approach is child centred; this means we should consider, at all times, what is in the best interests of the child/young person. Hartpury has a whole institutional approach to safeguarding; this means child protection and safeguarding are at the forefront and underpin all relevant aspects of processes and policy development. We take an 'it can happen here approach' where safeguarding is concerned. Victims of harm should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Ultimately, all systems, processes, policies should operate with the best interests of the child/young person at their heart.

1.3 Hartpury provides a safe environment in which children and young people can learn. Hartpury acts on concerns about a child's welfare, fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.

1.4 Safeguarding and promoting the welfare of children is defined in Working Together to Keep Children Safeguard Children (DfE Guidance) as:

- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes;
- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, inside or outside the home, including online.

1.5 Child Protection is part of safeguarding and promoting the welfare of children and is defined in Working Together to Safeguard Children as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including foster care and residential care as well as online.

1.6 The term "children" means "those under the age of 18". Hartpury recognises that some adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of adults at risk.

1.7 The abuse of children and young people is one of the most difficult issues that staff may be called upon to deal with, but one that cannot be ignored. Tutors, other staff and work experience providers are particularly well placed to observe outward signs of abuse, changes in behaviour, or failure to develop, which may be indicators that abuse is taking place within the young person's life. It is not however the responsibility

of Hartpury, its staff or work experience providers to investigate alleged abuse.

1.8 No single practitioner or member of staff can have a full picture of a young person's needs and circumstances. If the child/young person and family are to receive the right level of support, at the right time, everyone that comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

1.9 This policy covers Hartpury's statutory responsibilities relating to child protection, safeguarding young people and adults at risk and duties under the Prevent duty. The Prevent Duty guidance for further and higher education can be accessed by the links below. The Government's Prevent Statutory guidance seeks to stop vulnerable people being radicalised; therefore, our approach is to consider Prevent as a form of safeguarding, recognising that we have a duty of care to protect adults at risk and children/young people from neglect or abuse. Our approach to safeguarding aims to be broad and we encourage anyone with concerns about the well-being of a student or member of staff to take appropriate action. Effective safeguarding is anti-discriminatory and anti-racist.

Prevent duty guidance: for further education institutions in England and Wales (2015) - GOV.UK
Prevent duty guidance: for higher education institutions in England and Wales (2015) - GOV.UK

1.10 Hartpury will work with the Gloucestershire Safeguarding Children Partnership (GSCP), the police and other external agencies while always placing the welfare of the child/young person at the centre of any actions taken.

2. Purpose/Scope

2.1 The purpose of this policy and procedures is to ensure that Hartpury responds in a measured and supportive manner to reports or suspicions of abuse including child on child/peer on peer abuse. This policy applies to all students, staff, volunteers, consultants, interns, subcontract provision, casual and agency workers who are engaged in the work of Hartpury and as such all can raise concerns under it.

2.2 The key aims that surround this policy are stated in safeguarding legislation and guidance, which includes;

- The Children Act 1989 provides the legislative framework for child protection in England.
- The Children Act 2004, which encourages partnerships between agencies.
- The Children and Social Work Act 2017, which amends the above two Acts.
- Working together to safeguard children (Department for Education)
- Keeping children safe in education (Department for Education)
- The Safeguarding Vulnerable Groups Act 2006

3. Principles

3.1 Hartpury Governors and Senior Management are committed to safeguarding and promoting the wellbeing of all students by:

- PREVENTION - providing a safe environment for students, young people and adults at risk to learn, study and reside;
- PROTECTION - identifying students, young people and adults at risk who are suffering, or likely to suffer, significant harm and protecting from maltreatment;
- SUPPORT - taking appropriate action to see that such students, young people

and adults at risk are kept safe at home, at Hartpury and in the workplace;
- ACTION – taking action to ensure all students, young people and adults at risk have the best outcomes.

3.2 In pursuit of these aims, Hartpury Governors and Senior Management will ensure that safeguarding is a high priority and annually review and approve policies and procedures with the aim of:

- raising awareness of issues relating to the welfare of young people and adults at risk and ensuring the promotion of a safe environment for learning within Hartpury;
- aiding the identification of young people and adults at risk of significant harm, and providing procedures for reporting concerns;
- establishing procedures for reporting and dealing with allegations of abuse against members of staff;
- the safe recruitment of staff.

3.3 Hartpury has a nominated a Governor with special responsibility for child and young person protection issues. The Governor will undertake appropriate training. The specific responsibilities of the nominated Governor are in Appendix 1.

3.4 In developing child protection and safeguarding policies and procedures, Hartpury will take account of, guidance issued by the Department for Education, the Association of Colleges and other relevant bodies and groups. This policy and procedures have been developed in consultation with the Gloucestershire Safeguarding Children Partnership (GSCP).

4. Roles

4.1 A designated senior member of Hartpury staff will have lead responsibility for young person protection issues (Designated Safeguarding Lead – DSL). The DSL is supported by the Vice-Chancellor & Executive Principal who has ultimate responsibility for safeguarding reporting to the Board of Governors. The specific responsibilities of the nominated Vice-Chancellor & Executive Principal are in Appendix 1.

4.2 Any member of staff who either by virtue of a young person's behaviour becomes suspicious of abuse, or is told that abuse has taken place, should immediately inform a member of the designated Safeguarding Team at Hartpury. As a basic rule, only those people who need to know should be told of the incident or allegation.

4.3 Hartpury will refer any concern that a child/young person might be at risk of significant harm to the appropriate external agency. See Appendix 6 of this policy.

4.4 The Board of Governors:

- will receive from the DSL, an annual report which reviews how the duties have been discharged; this will include an annual filtering and monitoring assurance report.
- will approve policies and draw to the attention of Hartpury staff, the criminal offences that may be committed in connection with the welfare of young people, in particular those involving abuse of trust which prohibit staff from engaging in or encouraging sexual activity with young people which is detailed in the Code of Professional Conduct.
- acknowledges and will comply with its obligations under safeguarding legislation and in connection with the provision of residential accommodation for

those under 18 set out in the National Minimum Standards and the Social Care Common Inspection Framework (SCCIF) for Residential Provision.

4.5 The Board of Governors have agreed that the Vice-Chancellor & Executive Principal should, in their role of Principal, reside in campus accommodation to discharge their duties as the head of the institution with lead responsibility for safeguarding and health and safety. This is to mitigate the considerable safeguarding and reputational risks posed by the large number of under 18-year-old students living in onsite accommodation, many of whom are performing duties early in the morning or late at night in equine and agricultural areas as part of their courses.

4.6 The Vice-Chancellor & Executive Principal and all staff working with young people will receive training adequate to their job role to familiarise them with safeguarding issues and responsibilities and Hartpury procedures and policies, with refresher training appropriate to their role at Hartpury. All staff will read and understand Part 1 of Keeping Children Safe in Education in full. Those working directly with children will also read Annex A (Further information).

4.7 Governors should receive appropriate safeguarding and child protection training at induction, and then at regular intervals. Training should provide them with the knowledge to ensure Hartpury's safeguarding policies and procedures are effective.

5. Responsibilities

5.1 The designated SMT member of staff with lead responsibility for young person protection issues is Lesley Worsfold, Chief People Officer/ DSL who:

- has a key duty to take lead responsibility for raising awareness among the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for children and young people learning at Hartpury;
- will receive training in young person protection issues and inter-agency working, as required by the Gloucestershire Safeguarding Children Partnership, and will receive refresher training at least every 2 years;
- will keep up to date with developments in child and young person protection and safeguarding issues at least annually;
- will provide an annual report to the Board of Governors setting out how Hartpury has discharged its duties; this will include an annual filtering and monitoring assurance report.
- is responsible for reporting deficiencies in procedure or policy identified by the Gloucestershire Safeguarding Children Partnership (or others) to the Board of Governors at the earliest opportunity.

5.2 The specific responsibilities of the designated SMT member of staff with lead responsibility are described in Appendix 2 of this policy.

5.3 Rayna Edwards also has responsibility for young person protection issues and is Hartpury's Deputy Designated Safeguarding Lead (DDSL) – can be contacted on 01452 702495 or 07788 148358 who can be contacted out of hours and to whom all safeguarding incidents should be reported.

5.4 The specific responsibilities of designated members of staff are described in Appendix 3 of this policy.

5.5 A member of the Designated Safeguarding Team will always be available to discuss safeguarding concerns. DDSLs share the responsibility of the 24/7 safeguarding phone. The other DDSLs are Lucy Adlam, Assistant Head of Health, Jon Glover,

Assistant Head of Safeguarding, Kimberley Thompson, Assistant Head of Safeguarding and Morgan Hearn, Assistant Head of Safeguarding.

6 Definitions

6.1 **Child**: A young person under the age of 18.

Vulnerable Adult/Adult at risk: A person aged 18 years or over who is or may be in need of community care services by reason of mental or another disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.'

Dept. of Health
('No Secrets', drawn from the consultation white paper, 'Who decides' – Lord Chancellors Department 1997)

The Safeguarding Vulnerable Adults Act 2006 (s59) defines 'vulnerable adult' as a person who is:

- Receiving social care service
- Receiving health service care
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of their affairs
- Receiving a service or participating in an activity targeted at older people, people with disabilities (learning or physical) or with physical or mental health conditions.

We strongly believe that we have a duty of care to all our students regardless of whether they are under or over the age of 18. We recognise that there are students over the age of 18, who may not meet the criteria detailed above, but nonetheless are still at risk and may require support and assistance to protect their wellbeing and safety. Adult students at risk could, for example, include students experiencing a range of life challenges such as a bereavement, a family breakdown, homelessness or moving to the UK to live and study, as well as those with mental health issues or those misusing alcohol and/or drugs. There are many types of situations from which students should be safeguarded and these include, but are not limited to, the following:

- Physical abuse
- Sexual abuse or exploitation
- Financial abuse
- Emotional/psychological abuse
- Enticement into illegal activities
- Recruitment to extremist groups/organisations
- Domestic violence
- Honour based violence
- Gang violence
- Neglect

Disclosure: A person states they have been or are being abused by another.

Allegation: A member of staff (including agency staff), governor, contractor or volunteer working with children or vulnerable adults is accused of committing an abuse.

6.2 Abuse

Abuse is defined in 'Keeping Children Safe in Education' (KCSiE) as 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members often referred to as child to parent or care giver abuse.

Types of abuse are difficult to define precisely or fully. However, the following examples are indicative of various types of abuse:

- **Physical Abuse:** Young persons are physically hurt, injured or in extreme cases killed. This can involve hitting, shaking, throwing, poisoning, giving the young person inappropriate drugs and alcohol, burning or scalding, drowning, suffocating or other causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/young person.

- **Emotional Abuse:** the persistent emotional maltreatment of a child/young person such as to cause severe and adverse effects on their emotional development. It may involve conveying to the young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. This can include verbal abuse such as persistent criticism, belittling or name calling. It may include not giving the young person 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 young people. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.

- **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 young person 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/young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/young people to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of young people by other young people is a specific safeguarding issue (also known as child on child / peer on peer abuse) in education and all staff should be aware of it and Hartpury's procedures for dealing with it.

- **Neglect:** The persistent failure to meet a child's/young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/young person's health or development. Neglect may occur during pregnancy, for example, 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.

Staff should be aware that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

6.3 Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children/young people at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplained absences from education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children/young people are at risk.

Disclosure

All staff should know what to do if a child/young person tells them that they are being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Only involving those who need to be involved such as the members of the Hartpury Safeguarding team or Children's Social Care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children/young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Hartpury Safeguarding team. If they have concerns about a child/young person, it is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Female Genital Mutilation mandatory reporting duty for teachers

Whilst all staff should speak to the DSL/DDSL with regard to any concerns about

female genital mutilation (FGM), there is a specific legal duty on teaching staff. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out or suspect is likely to be carried out on a girl under the age of 18, the teacher must report this to the police.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional issues. Children/young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child/young person has suffered or is at risk of suffering abuse, neglect or exploitation. This can include self-harm, signs of an eating disorder, suicidal ideation or suicide. Where a mental health concern may indicate that a child is suffering, or is at risk of suffering, abuse, neglect or exploitation, staff will follow Hartpury's usual safeguarding reporting route without delay, so the concern can be assessed alongside any other information held about the child.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children/young people have suffered abuse andneglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Child on Child / Peer on Peer Abuse

This must be taken seriously and acted upon, under the appropriate Hartpury policy. Hartpury has a zero-tolerance approach to child on child / peer on peer abuse. It is essential that all Hartpury staff understand the importance of challenging inappropriate behaviours between peers, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for students and at the most extreme a culture that normalises abuse leading to young people accepting it as normal and not coming forward to report it. These issues will be part the college Prep for Success Programme for all students. Victims will be supported through Hartpury's pastoral and wellbeing systems. Any hate crime/incident will be reported through local external reporting mechanisms.

Child on child / peer on peer abuse is most likely to include, but may not be limited to (see Appendix 8 for further information):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (teenage relationship abuse);

- physical abuse causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- physical assault and harm or the threat of harm with a weapon (including fake weapons);
- harmful sexual behaviour, sexual violence and sexual harassment which may include misogyny/misandry. Sexual violence includes rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence). Sexual harassment includes sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We recognise that, for some (but not all) forms of child-on-child abuse, it is more likely that girls will be victims and boys perpetrators; however, all child-on-child abuse is unacceptable and will be taken seriously regardless of the sex of those involved.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, who may themselves need support; it is preventable, and staff have a responsibility to report any concerns to the DSL regardless of whether the incident happened on or off site. Sexual harassment and violence between children can be linked to wider cultures of misogyny.

Issues surrounding Honour Based Violence (HBV), Forced Marriage and Radicalisation may also be relevant where coercion or power imbalances are involved between peers. It is also important to recognise that child on child / peer on peer abuse may well involve students here at Hartpury and young persons and children in other contexts, thus making a full range of abuse types possible. When dealing with any disclosure of abuse it is important to consider;

- Is there a significant **power imbalance** between the young people concerned? The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of child on child/peer on peer abuse this may not always be the case.
- Has the perpetrator **repeatedly** tried to harm one or more other children.
- Are there concerns about the **intention** of the alleged perpetrator. If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not.
- The extent to which any victim has given consent is also important.

All staff should be clear on Hartpury's policy and procedures with regard to child on child / peer on peer abuse and the important role they have to play in preventing it and responding where they believe a young person may be at risk using the reporting procedure outlined in this policy.

6.4 Sexual Violence and Sexual Harassment

The 'Sexual violence and sexual harassment between children in schools and colleges' guidance was published by the government in December 2017 and republished in May 2018. A summary of this document is included in the Keeping Children Safe in Education guidance which gives it statutory status. KCSiE has now been expanded to cover the guidance previously covered in the DfE's Sexual Violence & Sexual Harassment guidance.

It also provides new information, emphasising:

- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- the need for schools and colleges to be part of discussions with statutory safeguarding partners

Policies, procedures and training should include sexual violence and sexual harassment.

Sexual violence and sexual harassment can occur between two children/young people of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of Keeping children safe in education (KCSIE), all staff working with children are advised to maintain an attitude of **'it could happen here'**.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. The best responses to child sexual violence and harassment are those which take a whole school or college approach to safeguarding and child protection. This means involving everyone in the school or college, including the governing body, all the staff, children, adult students and parents and carers. Safeguarding and child protection should be a recurrent theme running through policies and procedures. Hartpury's approach to sexual violence and sexual harassment reflects and is part of the broader approach to safeguarding. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Safeguarding procedures with regard to sexual violence and sexual harassment should be transparent, clear and easy to understand for staff, pupils, students, parents and carers. Children/young people should be able to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.
Ofsted's review of sexual abuse in schools and colleges provides more detail on this topic and why all educational institutions must take this seriously.

https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools- and-colleges/review-of-sexual-abuse-in-schools-and-colleges

Sexual violence and sexual harassment can happen to anyone although those more at risk include young people and adults at risk.

6.5 Serious Violence

Staff should be aware of the indicators, which may signal young people are at risk from, or are involved with serious violent crime. Increased absence from education, a change in friendships/relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries could all be indicators. Unexplained gifts or new possessions could also 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. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Hartpury recognises that possession or use of a weapon (or fake weapon) may be an indicator of serious violence, child criminal exploitation, gang involvement, or other safeguarding concerns and will respond accordingly. Any member of staff who becomes aware that a student is carrying a weapon, has used a weapon, is in possession of a weapon, or has expressed an intention to use a weapon must report this immediately to the DSL/DDSLs.

6.6 Radicalisation and Extremism

Hartpury recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. Hartpury will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed in Appendix 8, staff should use their professional judgement and discuss with the Hartpury's Prevent Lead if they have any concerns:

6.7 Special Educational Needs and Disability (SEND)

Hartpury is aware and will ensure staff recognise the vulnerabilities of those students with SEND and the additional barriers that can exist when recognising abuse, including peer on peer abuse and neglect in this group of students. Staff must be aware that changes in behaviour, mood and injury may relate to possible abuse and not just a young person's SEND. Young people with SEND have a higher risk of peer group isolation and they are disproportionately affected by bullying. Educational institutions are encouraged to make sure that young people with SEND have a greater availability of support and mentoring in place.

6.8 Children missing from education

All staff should be aware that children/young people going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any

underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of Hartpury's student absence procedures.

(See Appendix 8 of this policy for additional information and further types of abuse)

7. Offer of Early Help/Family Help

7.1 "Early Help" or "Family Help" describes the type of early intervention and support that can be provided when the needs of a child, young person or adults at risk are not being met by routine universal services, but do not meet the threshold for specialist services such as those provided by Children and Adult Social Care. Hartpury endeavours to provide a range of internal support services and to work with partner agencies to help its students and their families deal with any issues as early as possible by providing support, information, advice, education and training. Staff must report any early help concerns to Hartpury's Deputy Designated Safeguarding Leads.

7.2 Any child/young person may benefit from early help but staff should be particularly alert to the potential need for early help for a child/young person who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from education, home or care;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is self-harming;
- has suicidal ideation;
- has mental ill health;
- has returned home to their family from care
- is a privately fostered child.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent/carer in custody or is affected by parent offending

8. Children who are Lesbian, Gay, Bi or Trans (LGBT)

The fact that a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children/young people to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

9. Gender questioning children/young people

Hartpury has a statutory duty to safeguard and promote the welfare of all children, including any child who is questioning their gender, as well as their peers, and will consider the impact of any decision on all children affected. Risk/needs assessments will be considered.

Where a child asks for support with social transition, we will:

- Engage parents/carers as a priority and give their views considerable weight, except in the rare circumstances where doing so would place the child at greater risk – in which case the DSL/DDSLs will determine what action is needed to safeguard the child before parents/carers are contacted;
- Take a careful approach, recognising that social transition is an active intervention that may have significant effects on a child's wellbeing and longer-term outcomes;
- Consider what is in the best interests of the child and of other children, drawing on clinical and non-clinical professional advice where relevant, and taking into account any wider health issues or neurodiversity;
- Document the decision-making process and keep records, including where a request is not agreed to ensure that toilets, changing rooms, and boarding/residential accommodation designated for one biological sex are not made available to a child of the other biological sex, including as a form of social transition;
- Comply with our duties under the Equality Act 2010 and the Human Rights Act 1998, considering whether any policy would place a gender-questioning child at a disadvantage relative to other children, and linking this consideration to Hartpury's wider inclusion and equality processes.

10. Procedures for responding to reports or suspicions of abuse (see Appendix 5)

10.1 It is the responsibility of staff including volunteers to report concerns NOT to decide whether it is or is not abuse. The need to protect the child or adult at risk overrides any concerns about "false allegations"; even if staff think a disclosure or allegation may be untrue it must still be reported. Abuse is usually discovered in three ways:

- The student discloses to someone that abuse has or may have occurred.
- Someone sees the abuse occur.
- Someone identifies signs and symptoms that may indicate abuse.

10.2 If a young person begins to talk about an abusive incident, they should be allowed to speak, but should only be questioned with care. No leading questions should be asked or words suggested. Questioning should seek only to clarify to be sure that what the young person is saying is understood. **(WHO, WHAT, WHERE, WHEN)**

10.3 Staff should not investigate concerns or allegations themselves but should report them immediately to one of the designated safeguarding members of Hartpury staff (identified in paragraph 5.3).

10.4 If any injury requires immediate treatment the designated safeguarding members of staff should arrange this without delay, in whichever way seems appropriate. The designated member of staff should then continue to follow the procedure and flowchart as described in Appendix 4. Staff should record any injuries on MyConcern immediately.

10.5 The designated members of staff will report internally to the Deputy Designated Safeguarding Leads.

10.6 All notes of interviews will be recorded on MyConcern and reviewed by the DDSL or their deputy.

10.7 Generally, staff other than the designated safeguarding members of staff or the Vice-

Chancellor & Principal should not make referrals. However, if after discussion with the designated safeguarding members of staff, a member of staff believes that a referral should be made but the designated safeguarding member of staff does not, they may make the referral in accordance with Gloucestershire Safeguarding Children Partnership guidelines. Referrals must be made within 24 hours in writing or with written confirmation of a telephone referral.

11. Procedures for responding to alleged abuse by a member of Hartpury staff (See Appendix 7)

11.1 In rare instances, members of staff of an educational institution have been found responsible for abuse against a young person. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. Hartpury recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

11.2 Hartpury recognises that the Children Act 1989 & 2004, and subsequent acts, state that the welfare of the young person is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within Hartpury will do so with sensitivity and will act in a careful, measured way.

11.3 A member of staff receiving a complaint against a member of staff/volunteer/contractor should immediately report it to the DSL, who in turn should report it to the Vice-Chancellor & Executive Principal.

11.4 A member of staff receiving a complaint against a designated safeguarding member of staff should report it immediately to the Vice-Chancellor & Executive Principal or in their absence the Chief People Officer (DSL).

11.5 The Vice-Chancellor & Executive Principal or the Chief People Officer (DSL) will report the incident to the Local Area Designated Officer (LADO) at the Gloucestershire Safeguarding Children Partnership (GSCP) who will provide advice and guidance.

11.6 A member of staff receiving a complaint against the Vice-Chancellor & Executive Principal should immediately contact the DSL, who should then contact the Chair of the Corporation who should contact the LADO who will meet urgently to plan any further appropriate action.

11.7 The procedure that the Vice-Chancellor & Executive Principal, DSL or the Chair of the Corporation should follow is in Appendix 7 of this policy.

12. Procedures for safer selection and recruitment

To safely recruit staff, Hartpury's existing recruitment and selection procedures take account of the following:

- They apply to staff and volunteers who may work with children and young people.
- The post or role is clearly defined.
- The key selection criteria for the post or role are identified.
- Vacancies are advertised widely in order to ensure a diversity of applicants.
- Documentary evidence of academic/vocational qualifications is required relevant to the post.

- Professional and character references are obtained and verified.
- Previous employment history is verified.
- A Disclosure and Barring (DBS) check is made (sensitive and confidential use of the applicant's disclosure is maintained) in advance of the staff member starting employment.
- A variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks) are used.
- Should consider online searches as part of their due diligence checks on shortlisted candidates.
- Under no circumstances will a volunteer/employee/contractor on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

13. Work Placements

Employers who provide work experience opportunities for young people are required by Hartpury to comply with Hartpury's UK Placement Provider Handbook. Hartpury requires work placement providers to take all reasonable action to safeguard the welfare of students completing placements.

Where a student's placement duties involve working with under 18's or adults at risk the placement provider is required to fully brief the student on their own Safeguarding policies and procedures.

The placement provider is required to report any concerns relating to safeguarding immediately to a member of the Hartpury Safeguarding Team.

14. Online safety

It is essential that children/young people are safeguarded from potentially harmful and inappropriate online material. An effective whole institution approach to online safety empowers an institution to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Hartpury ensures that there are appropriate filters and monitoring systems in place together with an appropriate system for escalating concerns.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti- Semitism, radicalisation and extremism.
- **contact**: being subjected to harmful online interaction with other users; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (eg. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Hartpury will ensure online safety is a running and interrelated theme whilst devising

and implementing policies and procedures. Hartpury will ensure students are alert to emerging online risks, including AI-generated content, deepfakes and 'nudification' apps which can be used to create fake sexual images of a child, and the spread of misinformation and disinformation online.

Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK

This requires school and colleges to:

- Identify and assign roles and responsibilities to manage their filtering and monitoring systems. Schools and colleges should identify and assign a member of the senior leadership team and a governor to be responsible for ensuring the standards are met. The designated safeguarding leads and IT team should work closely in all aspects of filtering and monitoring. The DSL will work with the Executive member (Director of IT) who has lead responsibility for filtering and monitoring systems to monitor and ensure their effectiveness and know how to escalate concerns when identified.

- Review their filtering and monitoring provision at least annually and report this to governors. Governing bodies have overall strategic responsibility for meeting the duty to have appropriate/effective filtering and monitoring systems in place.

- Ensure their filtering system blocks harmful and inappropriate content without unreasonably impacting teaching and learning. An active and well managed filtering system is an important part of providing a safe environment for students to learn. An effective filtering system needs to block internet access to harmful sites and inappropriate content. However, it should not unreasonably impact teaching and learning, or other aspects of college administration and it should not restrict students from learning how to assess and manage risk themselves. Schools and colleges need to understand the coverage of their filtering systems and be aware of any limitations it has. This will enable them to mitigate accordingly to minimise potential harm and meet their statutory requirements under KCSIE and the Prevent duty.

- Implement effective monitoring strategies that meet safeguarding. Schools and colleges should ensure that any monitoring data is received in a format that staff can understand and that users are identifiable, so concerns can be traced back to an individual. It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff. The DSL/DDSLs should take lead responsibility for responding to any safeguarding and child protection matters that are picked up through monitoring.

- Ensure staff training on filtering and monitoring is part of safeguarding trainin

15. Whistleblowing/Public Interest Disclosure Procedure

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Hartpury's safeguarding regime and know that such concerns will be taken seriously by the SMT. Appropriate whistleblowing procedures, are in place. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them (see Keeping Children Safe in Education, (KCSiE).

16. Whisper Anonymous Reporting

Whisper enables students to report safeguarding, wellbeing, welfare, bullying, or safety concerns anonymously. Reports are reviewed by appropriate safeguarding staff and managed in line with Hartpury safeguarding procedures, with action taken where appropriate

17. References

- Cross Hartpury Policies relating to safeguarding including Guidelines on Professional Boundaries, Code of Professional Conduct, Public Interest Disclosure Procedure, Recruitment & Selection Policy.

- Keeping Children Safe in Education, (KCSiE), Department for Education. Part one of this guidance (at a minimum) should be read by all staff and Hartpury has mechanisms in place to assist staff understanding. The full guidance can be accessed via the following link Keeping children safe in education - GOV.UK

Hartpury will publish this policy on the staff intranet, the Hartpury website and it will form part of student enrolment pack.

Review

Hartpury will ensure this policy is effective and it will be reviewed at a minimum annually as well as in response to relevant legislative changes.

First approved by the Corporation 12th July 2006



Signature:

Name: Edward Keene, Chair of Governors

Amended 25th July 2007	Amended 2nd July 2018
Reviewed 10th July 2008	Amended 25th September 2018
Amended 14th July 2009	Amended 2nd September 2019
Reviewed 14th July 2010	Amended 20th April 2020
Amended 14th July 2011	Amended 29th October 2020
Amended 12th July 2012	Amended 1st September 2021
Amended 10th June 2013	Amended 1st September 2022
Amended 15th May 2014	Amended 16th May 2023
Amended 26th June 2015	Amended 25th August 2023
Amended 1st July 2016	Amended 9th September 2024
Amended 29th June 2017	Amended 24th September 2025
Amended 23rd September 2026	

Appendix 1

Responsibilities of the nominated Governor:

- The nominated Governor is responsible for liaising with the Vice-Chancellor & Executive Principal and the Designated Safeguarding Lead, to ensure that:

  - Hartpury has procedures and policies which are consistent with the Gloucestershire Safeguarding Children Partnership (GSCP) procedures
  - The Corporation considers the Hartpury policy on child protection and safeguarding each year and approves any recommendations
  - The Corporation is informed each year of how Hartpury and its staff have complied with the policy, including but not limited to a report on safeguarding activity and the training that staff have undertaken.

- The nominated Governor will be a key link with, Hartpury's Safeguarding Team.

- To assist in these duties, the nominated Governor shall receive appropriate training.

Responsibilities of the Vice Chancellor & Executive Principal:

- The Vice-Chancellor & Executive Principal is responsible for ensuring Hartpury has robust procedures and policies which are compliant with child protection and safeguarding legislation and statutory guidance, and that the Corporation considers any recommendations and approves annually the Hartpury policy on child protection and safeguarding.

- The Vice-Chancellor & Executive Principal receives immediate notification of any changes affecting the policy or procedures and ensures the policy is reviewed and amended as appropriate.

- The Vice-Chancellor & Executive Principal delegates operational responsibility and implementation of procedures to the DSL.

- The Vice-Chancellor & Executive Principal is responsible for ensuring the DSL compiles an annual report to inform the Corporation of how Hartpury and its staff have complied with the policy including, but not limited to, a report on safeguarding activity and the training that staff have undertaken.

- The Vice-Chancellor & Executive Principal is responsible for receiving and responding to allegations against members of staff and volunteers (as per KCSiE).

- The Vice-Chancellor & Executive Principal, if requested by Local Authority Designated Officers and if appropriate, will become the point of contact for communication with regard to an individual safeguarding matter concerning an allegation against a member of staff.

- As the Designated Lead Resident on the Hartpury campus and the lead should Hartpury invoke its Business Continuity Plan for an unplanned event, the Vice-Chancellor & Executive Principal is responsible for ensuring a swift response to critical issues on site, particularly incidents out of hours.

- To assist in these duties, the Vice-Chancellor & Executive Principal shall receive appropriate training.

Appendix 2

Responsibilities of the designated senior member of staff (DSL):

The activities listed below can be delegated to appropriately trained deputies but the ultimate lead responsibility remains with the designated safeguarding lead.

Manage referrals

1. Refer cases of suspected abuse to the LA children's social care as required and support staff that make referrals.
2. Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals.
3. Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required.
4. Refer cases where a crime may have been committed to the Police as required.

Work with others

5. Liaise with the Vice-Chancellor & Executive Principal to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
6. Liaise with the 'case manager' and the LADO for child protection concerns (all cases which concern a staff member).
7. Liaise with staff on matters of safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support for staff.

Training/Raising awareness

8. Ensure Hartpury's Safeguarding and Child Protection policies are known, understood and used appropriately.
9. Ensure Hartpury's Child Protection and Safeguarding Policy is reviewed annually
10. Ensure that the Child Protection and Safeguarding Policy is available publicly.
11. Link with the GSCP to make sure staff are aware of training opportunities and any policy updates.
12. Undergo training every 2 years to provide the knowledge and skills to carry out the role including Prevent awareness. This knowledge should be refreshed at regular intervals as required but at least annually to keep up with any developments relevant to the role.
13. Ensure that staff receive appropriate training in safeguarding and child protection issues and are aware of the Hartpury Child Protection and Safeguarding procedures and Keeping Children Safe in Education (DoE guidance).
14. Encourage a culture of listening to young people and taking account of their wishes and feelings, among staff, in any measures Hartpury may put in place to protect them.

Child Protection File

15. Where young people leave Hartpury oversee the DDSLs to ensure any child protection files are transferred to new college/school as soon as possible.

Appendix 3

Responsibilities of DDSLs:

1. Report to the DSL.

2. Make appropriate referrals to agencies.

3. Provide advice and support to staff on issues relating to child protection and safeguarding.

4. Have particular responsibility to be available to listen to young people studying at Hartpury.

5. Deal with individual cases, including attending case conferences and review meetings as appropriate.

6. Undergo training every 2 years to provide the knowledge and skills to carry out the role including Prevent awareness. This knowledge should be refreshed at regular intervals as required but at least annually to keep up with any developments relevant to the role.

7. Review safeguarding and child protection documents/policies issued by GSCP and update Hartpury policies accordingly.

8. Ensure all members of staff receive appropriate training as part of their induction.

9. Ensure that the safeguarding and child protection procedures are followed within Hartpury.

10. Liaison over safeguarding and child protection procedures with relevant external agencies.

11. Receive reports of alleged or suspected child abuse within Hartpury, or reported by a student relating to incidents at home or outside Hartpury, contacting the appropriate external agency and taking other action in response.

12. Where young people leave Hartpury ensure their child protection file is transferred to new college/school as soon as possible in line with the KCSiE guidance.

13. All DDSLs must participate in regular formal supervision sessions to support professional reflection, decision-making, safeguarding practice, wellbeing, and continuous professional development.

Appendix 4

Detailed procedures for responding to reports or suspicions of abuse

1. Staff should not investigate the allegation further but should refer to the Deputy Designated Safeguarding Leads and discuss what action needs to be taken.

2. The DDSL will inform the young person who made the initial allegation, what the next steps are to be. The young person and member of staff, who raised the concern must be kept informed of progress.

3. The DDSL may want to arrange for the young person to be further interviewed to substantiate the concern. The DDSL and the Gloucestershire Children's Social Care or Gloucestershire Multi-Agency Safeguarding Hub (MASH) will agree further appropriate action.

4. If the child is felt to be in any danger they should not be allowed to go home, if at all possible.

5. The discussions with Gloucestershire Children's Social Care or Gloucestershire Multi-Agency Safeguarding Hub (MASH) should involve consideration of how, when and by whom the parents/carers should be informed of the concern, bearing in mind on one hand the need to protect the young person and on the other the duty of the external agencies to work in partnership with parents wherever possible. Normally Hartpury will take responsibility for informing the parents/carers unless otherwise agreed by external agencies.

6. Hartpury has a general duty to co-operate with other agencies in cases of suspected child abuse. Designated members of Hartpury staff should be prepared to attend child protection conferences, and supply information, in writing if possible, as to any allegations made at Hartpury or contact with parents or carers as well as information concerning academic and general progress at Hartpury. If unable to attend, written reports should be submitted.

7. Designated members of Hartpury staff should be prepared to be part of the Child Protection or Child in Need Plan formulated by the child protection conference and to monitor future behaviour

8. The young person's confidentiality will be respected at all times within the confines of dealing with and reporting the incident.

"The 6 R's" are helpful in understanding what a professional's duties are in relation to responding to an incident - Recognise, Reassure, Respond, Report, Record, Refer (if necessary).

Safeguarding: Procedure



Forward your report to the Designated Safeguarding Officer via email

Forward your report to the Deputy Designated Safeguarding Lead via MyConcern or email at Safeguarding@hartpury.ac.uk or in person on the same day.

Appendix 6

Procedures for those in Designated Safeguarding roles

Procedure in relation to disclosures or causes for concern in relation to children, young persons and adults at risk:

Under 18:

On receiving report of disclosure or other cause for concern:

- Check the level of your concern against the GSCP Levels on Intervention guidance Gloucestershire.gov.uk graduated pathway practice guidance and levels of intervention

- Complete a Multi-Agency Referral Form (MARF) if the concern meets the threshold and submit the form using the online link below.

  Contact Children and Families Services | Gloucestershire County Council

  Report a child protection concern | Gloucestershire County Council

  Professional Advice Line 01452 427070 (Monday to Friday 8.30am to 4.30pm)

- If you think a child or young person is at immediate risk of significant harm, call Gloucestershire MASH 01452 426565 option 3 for Safeguarding Concerns

Otherwise see the checklist below

- Check the level of your concern against the GSCP Levels of Intervention Guidance.
- Explore your concerns with your Safeguarding Lead / Parents / Child.
- Ask the family what support / help they might need and consider how your agency could respond.
- If you are still uncertain what you should do about your concern you can also call for advice on 01452 426565 or a Community Social Worker to discuss your concerns and decide the most appropriate response to meet the needs of the child and their family.
- If you think you need to draw in another agency, make sure that you get consent to refer / share information from the parent / guardian - this can be verbal but signed consent is best. You will need this to make a request. Where a child or young person is in serious danger contact the emergency services via 999 to seek urgent assistance.

18 years and over:

To make a referral contact the Adult Help Desk 01452 426868,

Referral form for adults: Adult social care portal.gloucestershire.gov.uk

Where the vulnerable adult is in serious danger contact the emergency services via 999 to seek urgent assistance.

Appendix 7

Detailed procedures for responding to alleged abuse by a member of Hartpury staff

Context

All allegations of abuse of children by those who work with children must be taken seriously. Allegations against any person who works with children cover a wide range of circumstances. These procedures should be applied when there is such an allegation or concern that a person who works with children, has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These concerns should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see ss16-19 **Sexual Offences Act 2003**);
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 **Sexual Offences Act 2003**);
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.);
- Possession of indecent photographs / pseudo-photographs of children.

If concerns arise about the person's behaviour in relation to their own children, the police and/or children's social care must consider informing the employer / organisation to assess whether there may be implications for children with whom the person has contact with at work, in which case these procedures will also apply.

Process

When informed of a concern or allegation, the DSL (or DDSL or Director of People in absence of the DSL) should:

1. Obtain a written record of the concern/allegation from the person who received it. A record of times, dates, locations and names of potential witnesses must be made on MyConcern. Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions.

2. Ensure the DSL/DDSL or Director of People reports the allegation (using the Gloucestershire Safeguarding Children Partnership referral form) to the Local Area Designated Officer for Allegations (LADO) within one working day. Referrals should not be delayed in order to gather information and a failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter. If an allegation requires immediate attention, but is received outside normal office hours, the DSL/DDSL/Director of People should consult the Gloucestershire MASH on 01452 426565 or police and inform the LADO as soon as possible.

There are up to three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence;
- Children's Social Care enquiries and/or assessment about whether a child is in need of protection or services;
- Consideration by an employer of disciplinary action.

3. Not investigate the allegation. The initial assessment will be on the basis of the information received and a decision whether or not the allegation warrants further investigation. If it is decided that an Allegations Management Meeting is to be called Hartpury should not carry out an investigation until the Allegations Management Meeting has taken place. The meeting will inform the next steps to be taken by both Hartpury and other agencies.

   The meeting should take into account the following definitions when determining the outcome of allegation investigations:

   - **Substantiated**: there is sufficient identifiable evidence to prove the allegation.
   - **False**: there is sufficient evidence to disprove the allegation (care should be taken to ensure that the child is not confused as to dates, times, locations or identity of the member of staff).
   - **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
   - **Unsubstantiated**: this is not the same as a false allegation. It means that there is insufficient evidence to either prove or disprove the allegation; the term therefore does not imply guilt or innocence. However if there is cause to suspect that a child is suffering or is likely to suffer significant harm, the LADO should refer to Children's social care and ask them to convene an immediate strategy meeting/discussion.
   - **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made. It may reflect inappropriate behaviour or poor practice by the member of staff and the matter should be addressed in accordance with the Hartpury disciplinary procedures

   The LADO will advise at every stage.

4. Hold in abeyance Hartpury's own internal enquiries while the formal Police or external agency investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform to the existing staff disciplinary procedures.

5. Be involved in, and contribute to, any investigation by an external agency, for example the police and/or any inter-agency strategy discussions.

6. Be responsible for ensuring that Hartpury gives assistance with the agency's enquiries.

7. Ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

8. Advise the member of staff that they should consult with a representative, for example, a trade union.

9. Consult with the Police or other investigating agency, particularly in relation to timing and content of the information to be provided, and shall:

   - ensure that the parents/carers of the young person making the allegation have been informed that the allegation has been made and what the likely process will involve.

- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve. The member of staff should be treated fairly and honestly and helped to understand the concerns expressed. They should be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.
- inform the Chair of Governors or Vice Chair if Chair is unavailable of the allegation and the investigation.
- keep a written record of the action taken in connection with the allegation.

Suspension:

10. Suspension is a neutral act and should not be automatic. In respect of staff other than the Vice-Chancellor/Executive Principal, suspension can only be carried out by the DSL or Director of People. In respect of the Vice-Chancellor/Executive Principal, suspension can only be carried out by the Chair of Governors (or in their absence, the Vice Chair).

11. Suspension may be considered at any stage of the investigation. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

12. Suspension should be considered in any case where:

    - there is cause to suspect a child/young person is at risk of harm.
    - the allegations are potentially serious enough to justify dismissal on the grounds of gross misconduct.
    - the allegation warrants investigation by the police.
    - where necessary for the good and efficient conduct of the investigation.

13. If suspension is considered, the member of staff should be encouraged to seek advice, for example from a trade union.

14. Prior to making the decision to suspend the DSL or Director of People will meet with the member of staff to explain the suspension process. In respect of the Vice-Chancellor/Executive Principal, the Chair of Governors (or in their absence, the Vice Chair) will meet with the Vice Chancellor/Executive Principal.

15. The member of staff should be advised to seek the advice and/or assistance of their trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the meeting is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension.

16. During the meeting, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The meeting is not intended to establish the member of staff's innocence or guilt, but give the opportunity for the member of staff to make representations about possible suspension. Hartpury recognises that this can be a very uncomfortable experience for the member of staff involved and will seek to support the member of staff either through the People Team, Occupational Health or if appropriate an external agency.

17. If the DSL of Director of People considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be sent as soon as possible and ideally within one working day.

18. Where a member of staff is suspended, the DSL or Director of People should address the following issues:

    - the Chair of Governors (or in their absence, the Vice Chair) should be informed of the suspension
    - any detail given to the Board of Governors should be minimal
    - where the Vice-Chancellor/Executive Principal has been suspended, the Chair of Governors or in their absence, the Vice Chair will need to take action to address the management of the Hartpury
    - the parents/carers of the young person making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the young person making the allegation of the suspension
    - senior members of staff that need to know of the reason for the suspension should be informed.

19. Depending on the nature of the allegation, the Vice-Chancellor/Executive Principal & DSL should consider whether a statement to the students of Hartpury and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

20. The Vice-Chancellor/Executive Principal & DSL shall consider carefully and review the decisions as to who is informed of the suspension and investigation.

21. The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.

22. The suspension should remain under review in accordance with the Hartpury disciplinary procedures.

23. In the event of a disciplinary investigation, it will be conducted in accordance with the existing staff disciplinary procedures.

24. Where the member of staff has been suspended and no disciplinary action is to be taken;
    - the suspension should be lifted immediately and arrangements made for the member of staff to return to work. This will be confirmed orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and wellbeing support.
    - The young person(s) making the allegation and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to Hartpury of the member of staff (if suspended).
    - Where the allegation was made by a young person other than the alleged victim, consideration be given to informing the parents/carers of that young person.
    - Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

25. The Vice-Chancellor/Executive Principal and DSL should give consideration to what information should be made available to the general population of Hartpury.

26. Where allegations are found to be without foundation such false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Gloucestershire Safeguarding Children Partnership, local external agencies as determined by local arrangements, in order that other agencies may act upon the information.

27. It is important that documents relating to an investigation are retained in a secure place together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

28. If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about Hartpury's statutory duty to inform the Disclosure and Barring Service (DBS) for inclusion on the DBS lists where it withdraws permission for an individual to engage in regulated or controlled activity or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not regulated or controlled activity because they think that the individual has engaged in relevant conduct, satisfied the Harm Test or received a caution or conviction for a relevant offence. (https://www.gov.uk/disclosure-barring-service-check)

29. Where an allegation has been made against a member of staff, the DSL and Director of People should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of Hartpury's procedures and/or policies. Consideration should also be given to the training needs of staff.

Appendix 8

1. Abuse comes in many forms. The following is not an exclusive list and the signs and symptoms do not necessarily indicate abuse:

2. Description/Examples	3. Possible signs and symptoms
4. Physical Abuse	
A form of abuse that causes physical harm and may involve • Hitting • Shaking • Throwing • Kicking • Pushing • Burning/scalding • Drowning • Suffocating • Misuse of Medication • Inappropriate Sanctions • Restraint	• Fractures • Sprains • Dislocations • Lacerations • Scalds/burns • Pressure sores • Bruising • Malnutrition • Unexplained injuries • Signs of medication misuse (over or under) • Untreated medical problems • Incontinence • Self-harm
Sexual Abuse	
Sexual abuse is any unwanted sexual act or activity. Sexual abuse can be carried out by strangers, someone known or even someone trusted such as a friend, colleague, family members or partners/ex partners. When a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong and they might be afraid to tell someone. Sexual abuse can happen anywhere, and it can happen in person or online. Rape and sexual assault or sexual acts which the person has not consented to, or could not consent to, or was pressurised into consenting to. It includes, sexual harassment, rape within marriage/ relationships, “honour” based violence, female genital mutilation (FGM), trafficking, sexual exploitation and ritual abuse.	• Pain, itching, bleeding or bruising in the genital area • Difficulty in walking or sitting • Torn or stained clothing • Sexually transmitted diseases • Changes in behaviour • Sexualised behaviour • Pregnancy • Having nightmares or bed-wetting • Changes in mood, feeling irritable and angry or anything out of the ordinary • Avoiding being alone with or frightened by people or a person they know
• **Emotional or psychological Abuse**	
The persistent emotional maltreatment of a child/young person such as to cause severe and adverse effects on their emotional development. • Threats of harm of abandonment • Deprivation of contactHumiliation • Blaming • Controlling • Intimidation • Coercion • Harassment • Verbal abuse • Isolation	• Fear • Depression • Withdrawal • Passivity • Confusion • Low self esteem • DeferenceAggression • Resignation • Ambivalence • Disturbed sleep pattern • Weight loss • Running away

• Withdrawal from services or support services	

Peer on Peer/Child on Child Abuse	
This form of abuse occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children/young people. It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. Behaviour may be intimate or non-intimate. It includes: • Bullying • Cyberbullying • Sexual violence • Harassment • Sexting	• Absence or disengagement from activities • Physical injuries • Mental or emotional health issues • becoming withdrawn • Lack of self esteem • Lack of sleep • Alcohol or substance misuse • Changes in behaviour • Inappropriate behaviour for age • Abusive towards others
Financial Abuse	
Theft, fraud, exploitation, pressure in connection with: • Wills • Property • Inheritance or financial transaction • Misuse of misappropriation of property, possessions or benefits	• Inadequate money to pay bills • Disappearing benefit payments • Sudden or large withdrawal from bank accountInadequate clothing • Lack of personal belongings • Poor standard of possessions
Neglect	
Ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services. The withholding of the necessities of life such as medication, adequate nutrition and heating.	• Dehydration • Malnutrition • Unexplained failure to respond to prescribed medicationInfections • Pressure sores • Inadequate clothing • Hypothermia
Discrimination	
Offensive language or behaviour that is directed at a person because of disability, ethnic origin, race, skin colour, culture, sexual orientation, size or age, any other form of harassment, slurs or similar treatment.	• Withdrawal • Anger/aggression • Loss of self esteem • Imitative behaviour
Cyber Bullying	
The use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others.	• Fear • Depression • Withdrawal • Loss of self esteem • Disturbed sleep pattern • Weight loss • Running away
Radicalisation/extremism	
Radicalisation is a process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence.	• Quick to anger • Intolerant • Closed – mindedness

	• Attitude towards women/ethnic groups/armed services • Isolated • Physical change – clothes etc. • Spreading messages • Overt new religious practices • Change in attitude • Non – attendance • Fall in work standard
Female Genital Mutilation (FGM)	
FGM, also known as female cutting and female circumcision is the ritual removal of some or all of the female genitalia. It is practiced in more than 28 African countries, parts of the Middle East, Asia and other countries. It is a form of child abuse and is illegal in the UK to remove a child from the country or perform FGM in the UK and can carry up to 14 years in prison. It is cultural and not done for any medical, health or religious reasons. It is done as a means of controlling women to supress sexual urges and ensure they remain pure until marriage. FGM is dangerous and can cause serious infections as well as problems with fertility, pregnancy, miscarriage and childbirth and stillbirths.	• Child may talk about becoming a woman • Going on a spiritual journey • Going on an extended family holiday • Going to visit elders in their country of origin • Pelvic infections • Infertility • Miscarriage • Stillbirths • Problems with pregnancy and natural childbirth • Pain and bleeding during sexual intercourse • Problems with menstrual periods • Incontinence • Scarring • Loss of libido • Urine retention • Pain and swelling • Feelings of shame and betrayal • Post-traumatic stress • Depression
Forced Marriage	
Forced marriage is a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse. There is often a continuum of coercion used to compel a marriage, ranging from outright physical violence to subtle psychological pressure. The United Nations views forced marriage as a form of human rights abuse, since it violates the principle of the freedom and autonomy of individuals.	• Emotional and or physical abuse by family members • Abandonment by family • Punishment including sexual violence and murder • Kidnapping • Ostracised by the community
Grooming, Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)	
CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity: • In exchange for something the victim needs or wants, and/or	• Missing overnight • Multiple STI, pregnancy, miscarriage • Misuse of drugs/alcohol • Relationship with controlling person • Physical abuse by same person • Emotional/ sexual activity

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- For the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- In exchange for something the victim needs or wants, and/or
- For the financial or other advantage of the perpetrator or facilitator and/or
- Through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

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- Entering/ leaving vehicles driven by unknown adults
- Frequenting potentially dangerous areas
- No contact with support systems.
- Relationship with a much older person(s)
- Emotional neglect by parent/ carer/ family member
- Physical abuse by parent/ carer/ family member
- Sexual abuse
- Breakdown of family relationships
- Family history of domestic violence
- Family history of substance misuse
- Family history of mental health difficulties
- Low self-esteem
- Unsuitable/ inappropriate accommodation
- Isolated from peers/ social networks
- Lack of positive relationship with a protective/nurturing adult
- Suddenly acquiring jewellery, phones, money and other gifts without explanation

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- **Gangs and Youth Violence**

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Gangs are groups of young people with a discernible structure, a recognised territory and distinctive beliefs, values, attitudes and behaviours. Although the gang may offer inclusion, protection and success to some socially disadvantaged children and young people, it is primarily concerned with: Crime, not infrequently drug-related, and violence, often armed and occasionally lethal.

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- Wearing clothing of a particular colour or branding
- Wearing baseball caps, tilted to the side or bandanas
- Decorative piercings or tattoos with certain symbols
- Using hand signals or certain words only known to those within their gang
- School books covered in graffiti associated with the gang name
- Children who isolate themselves from family
- Missing from education
- Lack of respect for authority figures or the law
- Hanging out with those who have been in trouble with the law
- Drug and alcohol abuse
- Use of nicknames
- Change in behaviour and personality

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Fabricated and/or induced illness	
This pattern of behaviour is where a caregiver fabricates, exaggerates, or induces mental or physical health problems in those in their care, usually to gain attention or sympathy from others. This is a rare form of child abuse and it is often difficult to define, detect and confirm.	• Mispresents symptoms • Fabricates signs • Manipulates laboratory tests • Purposely harms the child through poisoning, suffocation, infection, starvation or physical injury • Seeks unnecessary tests and explorative examinations • Absent from education
Sexting and revenge porn	
Sexting is the sending of sexually explicit messages usually over mobile phones and social media. Content can be shared between two romantic partners and then outside the relationship with others. It also occurs between people who are not yet in a relationship, but where one person's hopes to be. When sexually explicit content is shared and distributed without consent via any medium then this is known as revenge porn and is illegal in the UK.	• Sharing of texts and messages over phone and other media devices • Taking images and video and uploading these and sharing them with others with and without consent • Blackmail • Bullying • Coerce someone into continuing with a relationship
Domestic violence/ Honour based violence	
Any incident or pattern of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.	• Emotional abuse • Physical abuse • Sexual abuse • Financial abuse • Emotional abuse • Isolation from family and friends • Controlling partner • Mental health issues • Drug and alcohol misuse
• **Modern slavery/trafficking**	
Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including Sexual exploitation Domestic servitude Forced labour Criminal exploitation Organ harvesting. Human trafficking occurs where adults and children are traded so they can be exploited by others for commercial gain.	Looking scruffy, malnourished or injured Anxious, afraid or unable to make eye contact Working long hours, wearing unsuitable clothing or have the wrong equipment for the job? Living in overcrowded, poorly maintained housing where the curtains may always be closed May behave like they're being instructed by someone else, picked up/dropped off at the same time and place every day or don't have access to money or identification

AI Generated Abuse	
The use of artificial intelligence (AI) technologies to create, manipulate, or distribute harmful, deceptive, exploitative, or abusive content targeting an individual. This may include AI-generated images, videos, audio recordings, impersonation, deepfakes, sexualised imagery, harassment, blackmail, or the sharing of false information intended to cause distress, humiliation, or reputational harm	Fear, anxiety, or distress when using devices or social media Withdrawal from friends, education, or usual activities Sudden loss of confidence or self-esteem Changes in mood, including anger, depression, or emotional distress Reluctance to have photographs or videos taken Increased secrecy regarding online activity Reports of online impersonation, fake accounts, or manipulated content Self-harm, suicidal ideation, or other indicators of emotional harm Concerns about images, videos, or recordings being shared online without consent Unexplained absence from education or social activities due to embarrassment or fear of exposure
Self-Neglect, Self-Harm and Suicide Risk	
Self-neglect refers to behaviours that place an individual at risk due to a failure or inability to adequately care for their own physical, emotional, or psychological wellbeing. Within an education setting, this may include self-harming behaviours, suicidal ideation, suicide attempts, failure to seek support, substance misuse, or other actions that significantly increase the risk of harm to the individual.	Self-harm, including cutting, burning, scratching, bruising, or other forms of self-injury. Suicidal thoughts, expressions of hopelessness, or disclosures of wanting to die. Suicide attempts or incidents requiring emergency intervention. Possession of items intended for self-harm or suicide. Significant deterioration in mental health resulting in increased risk-taking or self-destructive behaviour. Refusal or reluctance to engage with support services despite evident risk. Substance misuse where there is a clear risk of physical or psychological harm. Persistent neglect of personal wellbeing, including sleep, nutrition, hygiene, or medical needs, resulting in increased vulnerability. Social withdrawal, isolation, or disengagement from education and support networks.

Appendix 9

Hartpury University and Hartpury College Policy related to the UK Prevent Strategy

Introduction and Context

Hartpury is committed both to protecting freedom of speech and academic freedom and to safeguard its students from the risk of being drawn into terrorism or extremism. This policy outlines Hartpury's commitment to preventing students from being radicalised and potentially being drawn into involvement with extremism and ultimately acts of terrorism. In doing so we recognise that terrorism can be associated with a range of ideologies. Key definitions are provided below. This policy is written with reference to the Counter- Terrorism and Security Act 2015, and to the Formal Guidance issued from the UK Home Office related to the Prevent statutory guidance: Revised Prevent duty guidance: for England and Wales, and Prevent duty guidance: for higher education institutions in England and Wales and the Prevent duty guidance: for further education institutions in England and Wales https://www.gov.uk/government/publications/prevent-duty-guidance (referred to as the 'Formal Guidance' throughout this policy). The Act places a duty on universities and colleges to have 'due regard to the need to prevent people from being drawn into terrorism.' The Act also notes that universities and colleges must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

Key Definitions

For the purposes of this policy, definitions of related key terms are taken from the 'Formal Guidance':

Child: A young person under the age of 18.

Vulnerable Adult/Adult at risk: A person aged 18 years or over who is or may be in need of community care services by reason of mental or another disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' The Safeguarding Vulnerable Adults Act 2006 (s59) defines 'vulnerable adult' as a person who is:

- Receiving social care service
- Receiving health service care
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of their affairs
- Receiving a service or participation in an activity targeted at older people, people with disabilities (learning or physical) or with physical or mental health conditions.

We strongly believe that we have a duty of care to all our students regardless of whether they are under or over the age of 18. We recognise that there are students over the age of 18, who may not meet the criteria detailed above, but nonetheless are still vulnerable and may require support and assistance to protect their wellbeing and safety. Vulnerable adult students could, for example, include students experiencing a range of life challenges such as a bereavement, a family breakdown, homelessness or moving to the UK to live and study, as well as those with mental health issues or those misusing alcohol and/or drugs.

There are many types of situations from which students should be safeguarded and these include, but are not limited to, the following:

- Physical abuse

- Sexual abuse or exploitation
- Financial abuse
- Emotional/psychological abuse
- Enticement into illegal activities
- Recruitment to extremist groups/organisations
- Domestic violence
- Honour based violence
- Gang violence
- Neglect

The situations above, including the possible signs and symptoms that a person may present with, are detailed in Appendix 8 of this policy.

Extremism: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. As well as calls for the death of members of UK armed forces, whether in this country or overseas.

Non-Violent Extremism: is extremism, as defined above, which is not accompanied by violence.

Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism: an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Principles

Hartpury is committed to:

- Fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our educational institution.
- Ensuring children and adults at risk are safeguarded from being drawn into extremism and terrorism as defined above.

As such, Hartpury seeks to identify, protect and support children and adults who it believes may be at risk of being drawn into extremism and terrorism.

Hartpury discharges this responsibility in partnership with other agencies, including the Police, appropriate Local Authorities and its named Prevent Regional Co-Ordinator.

This policy describes Hartpury's contribution to the multi-agency approach to delivering against the Prevent Duty. It also defines the process for referral into the local Channel processes. The Channel programme has been developed as part of the Prevent Strategy to provide support to people at risk of being drawn into terrorism.

Institutional Duties

Risk Assessment
Hartpury has a risk assessment in place to identify the potential risks associated with students being drawn into extremism and terrorism. On the basis of this risk assessment and any

identified concerns, an appropriate action plan has been developed to mitigate the risks.

Staff Training
A programme of training is in place for all Hartpury staff. All staff on joining Hartpury are introduced to the Prevent Duty by a session delivered by Hartpury's Prevent Lead as part of the Hartpury induction programme and by completing a Prevent online training module. All staff meet Hartpury's Designated Safeguarding Lead on joining so that they are fully aware of the safeguarding team and why safeguarding is critical in an educational setting; this also reinforces the Prevent Duty. All staff also book on to a safeguarding training course delivered by our Deputy Designated Safeguarding Leads which also covers Prevent. This robust training ensures that there are a number of opportunities to check understanding of Prevent among staff. This training is refreshed every three years for all staff and every two years for Hartpury's Safeguarding Team.

Raising Awareness
Staff and students are made aware of the process for referring concerns regarding students.

Chaplaincy & Faith Support
In line with the 'formal guidance', the University provides Chaplaincy support for students. This will include multi-faith chaplaincy support and designated Faith Space on the campus.

Hartpury Students' Union
Hartpury works closely with its Students' Union to ensure that the policies developed by Hartpury in this area are supported, where appropriate, by the Students' Union.

ICT Policy
Hartpury's ICT Policies have due regard to the duties specified in the 'Formal Guidance'.

External Speakers
Hartpury had a Code of Practice and monitoring process for External Speakers and Events on campus which includes freedom of speech and is regularly reviewed.

Prevent Lead
Hartpury has a 'Prevent Lead' whose duties include:

- Being a member of the Gloucestershire Prevent Partnership Board, and to actively engage with the Board to ensure that Hartpury benefits from local best practice and formal intelligence, and to support the work of the Board;
- To oversee Prevent related work and developments across the institution and the Students' Union monitored by the Hartpury's Safeguarding Committee;
- Ensuring relevant updates on the Prevent Strategy and on threat levels are communicated to appropriate Hartpury staff;
- Ensuring relevant staff are identified and provided with appropriate training; and in partnership with the HR Department, ensuring that a formal record is kept of those that participate in such training;
- Ensuring the Vice Chancellor/Principal is fully appraised of the most current Prevent- related developments.
- Completing an annual Prevent report and any reports requested by external bodies.

Hartpury's Prevent Lead has responsibility for ensuring Hartpury complies with the Prevent Duty. Ultimate responsibility for oversight of the Hartpury's Prevent duties rests with the Vice Chancellor/Principal.

Referral of Concerns Regarding Radicalisation

Just as when there are serious concerns over the wellbeing or safeguarding of a student, any

member of the Hartpury community (student or staff) may identify concerns about a student potentially being drawn into violent extremism or terrorism based on information received or behaviour observed.

It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

It is equally important that assumptions are not made on the basis of information received and that concerns/referrals are considered thoroughly and fairly. Hartpury will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies. See 'Hartpury Process Map for Reporting a Concern Regarding a Vulnerable Individual'.

Where a student or staff member has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism or terrorism, these concerns should be passed to Hartpury's Prevent Lead

Hartpury's Prevent Lead or nominee will look into the matter, seeking to gather together the substantive information and any evidence which would allow a full consideration of the case. A decision will be made as to the seriousness of the case. Three potential outcomes are likely at this stage:

a. No further action is required. In this case a confidential record of the case will be kept by Hartpury's Prevent Lead.
b. There is substance to the case but at this stage only internal action is required. The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed. It is anticipated that in the majority of cases the intervention would be supportive and safeguarding in nature.
c. A referral to the police is required because there are serious and immediate issues of safety to the student or others, and/or there is evidence to suggest a criminal act may be committed or has been committed. This decision would be taken only in the most serious of circumstances and only by Hartpury's Prevent Lead or nominee. In such cases the Vice-Chancellor/Principal will be informed of the detail and the police referral.

Information Sharing

In reaching a decision to share any information with third parties Hartpury will adhere to its Data Protection Policy and GDPR legislation.

In following the referral process outlined above there may be instances where Hartpury is sufficiently concerned by a student's behaviour and the risk they potentially pose that it will need to share these concerns with external agencies.

In sharing such information with external parties, Hartpury will share only sufficient and relevant information in order to allow the concern to be appropriately followed up.

Hartpury will keep confidential records of any information shared. These will be kept in accordance with GDPR.

Rayna Edwards

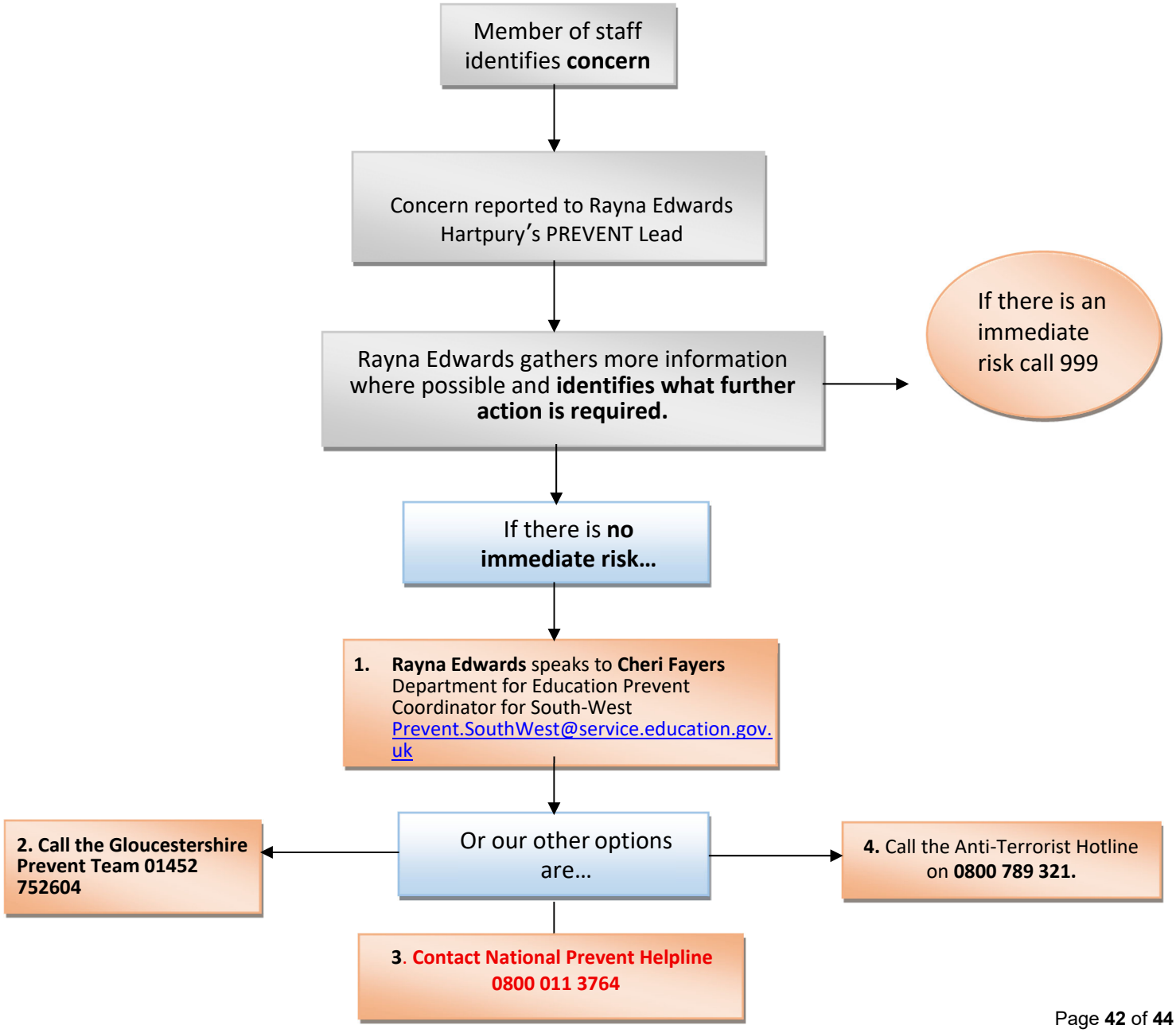
Head of Safeguarding, Wellbeing & Health | PREVENT Lead
August 2022 – updated April 2020, reviewed August 2021, reviewed August 2022, reviewed August 2023, reviewed August 2024, Reviewed August 2025, Reviewed September 2026

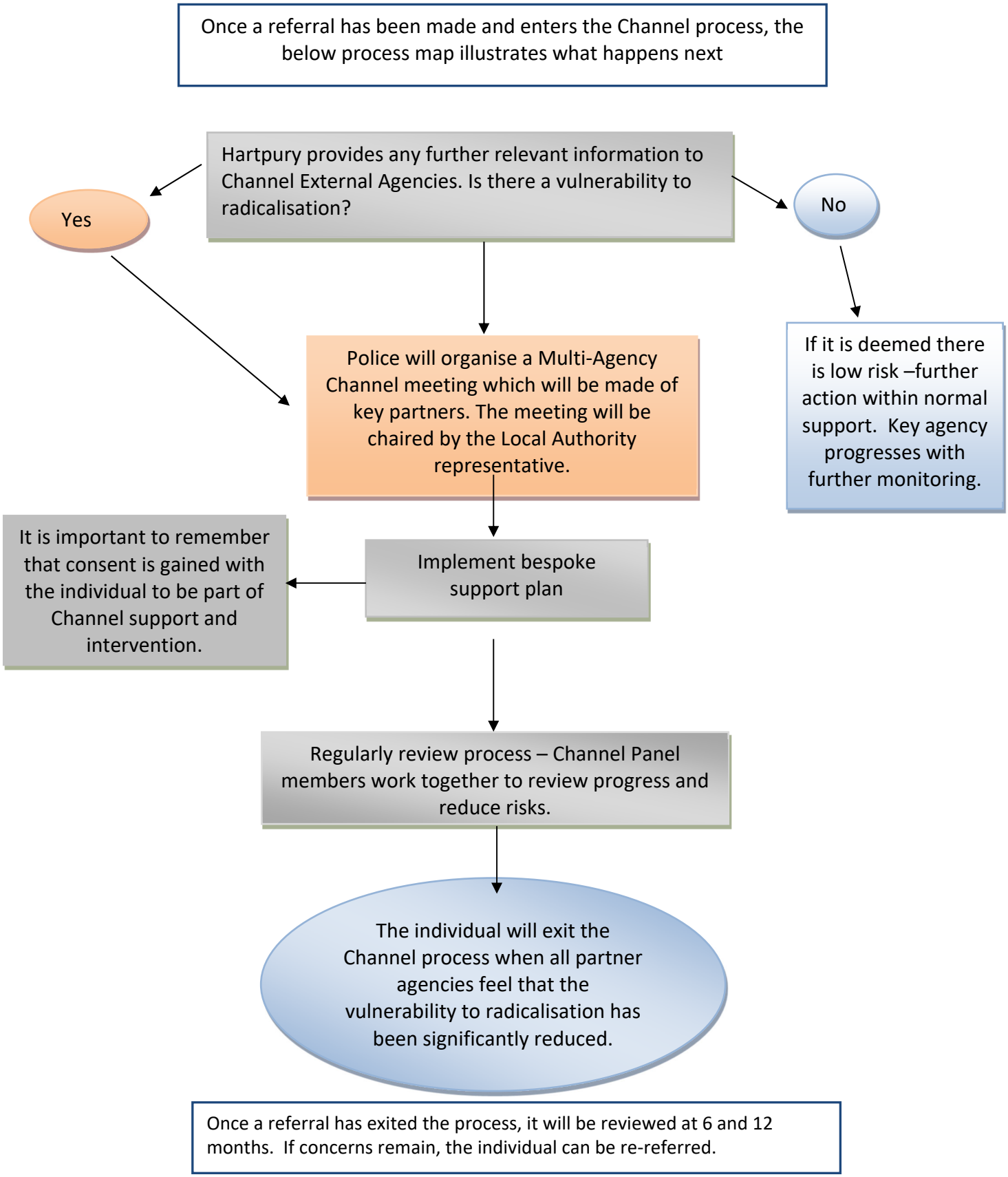
HARTPURY

Prevent and Channel

Process map for reporting a concern of a vulnerable individual

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:




Once a referral has been made and enters the Channel process, the below process map illustrates what happens next
Hartpury provides any further relevant information to Channel External Agencies. Is there a vulnerability to radicalisation?
Yes
No
If it is deemed there is low risk –further action within normal support. Key agency progresses with further monitoring.
Police will organise a Multi-Agency Channel meeting which will be made of key partners. The meeting will be chaired by the Local Authority representative.
It is important to remember that consent is gained with the individual to be part of Channel support and intervention.
Implement bespoke support plan
Regularly review process – Channel Panel members work together to review progress and reduce risks.
The individual will exit the Channel process when all partner agencies feel that the vulnerability to radicalisation has been significantly reduced.
Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.

Appendix 10

SAFEGUARDING IN THE CURRICULUM/BRITISH VALUES AT HARTPURY

British values are of importance to everyone involved in any Hartpury activity. Our Hartpury values and British values form the basis of citizenship in our diverse community. We promote these values to students and they are embedded in 0ur activities.

The Department of Education published guidance on promoting British values in schools and colleges to ensure that young people leave school and college well prepared for life in modern Britain. British values are defined as follows;

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of different faiths and beliefs

A whole-setting preventative education approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Hartpury's Prep for Success programme ensures our students receive effective and appropriate education and awareness raising.