

Safeguarding of Children, Vulnerable Adults and Prevention of Radicalisation Policy

1. Introduction

The University recognises that within its diverse population there may be members who are vulnerable at any given time. This Policy represents the commitment of the University of St Andrews in its obligation to protect children and vulnerable adults who are at risk of harm, abuse, neglect, exploitation, discrimination or being drawn into radicalisation.

All members of the University community have an essential role to play in ensuring that children and vulnerable adults are protected, and the University is committed to working within the principles of dignity, safety, equality and diversity.

1.1 Scope and aims

It is recognised that members of the University community may come into contact with children and vulnerable adults, including: students either whilst studying or on placement; contact through Student Services or other University facilities (e.g. sports or societies); work experience placements carried out by children and/or vulnerable adults; summer schools; field trips; outreach activities; events taking place on University property.

This policy applies to all members of the University community (including staff, students, contractors and visitors). It provides a framework which aims to:

- Promote a culture of Safeguarding, by 'protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect'. ¹ Within the scope of this policy, this definition also includes being drawn into radicalisation;
- Promote a culture in which signs of possible harm, mistreatment, neglect or attempts to radicalise are recognised and appropriately acted upon;
- Provide clarity of procedure for those involved, including reporting concerns, recording and communicating information, data protection and confidentiality;
- Promote positive collaborative working within the University and with any external agencies involved

1.2 Key principles for implementing this Policy (see Appendix 4 for further information)

- **Recognise** Know what to look for; recognise the signs and symptoms and listen to concerns. Seek help and discuss early in the course of your concerns.
- **Record** Keep a clear and contemporaneous record of your concerns
- **Report** Know where to get help and who to report your concerns to within the University

¹ Safeguarding people, Care Quality Commission. <http://www.cqc.org.uk/content/safeguarding-people>. Accessed 23.8.16



- **Refer** It is the responsibility of the Designated Officer (see clause 4.2) to refer concerns on to the appropriate external agencies (see below for further information)

1.3 Other Relevant Legislation, Policies and Procedures

This policy represents an overarching framework and exists alongside other legislation, University Policies and Procedures, and legislation including:

- Equality Act, 2010
- Scottish Specific Duties, 2012
- Public Sector Equality Duty, 2011
- Adults with Incapacity Act, 2000
- Sexual Offences Act, 2009
- The Adult Support and Protection Act, 2007
- The Protection of Vulnerable Groups (Scotland) Act, 2007
- Protection of Vulnerable Groups and Criminal Records Check: Policy and Guidance
- The Data Protection Act, 1998
- Health and Safety Policy
- Disciplinary Procedure
- Equality Policy
- Harassment and Bullying at Work and Study Policy
- Student Fitness to Study Policy
- Fitness to Practice Medicine Policy
- Counter-Terrorism and Security Act 2015
- Social Media Guidelines

2. Prevention

The University is committed to the protection of children and vulnerable adults, in addition to preventing those within its community being drawn into radicalisation. As such, the following steps have been taken:

- Recruitment of staff

The University will take all reasonable and appropriate measures to ensure that unsuitable people are prevented from working with children and vulnerable adults. Where it has been identified that staff/positions are likely to have contact with children/vulnerable adults in the course of their work, the University will follow the statutory guidance to ensure that, where appropriate, staff will join the Protection of Vulnerable Groups Scheme (PVG Scheme) which was introduced by the Protection of Vulnerable Groups (Scotland) Act 2007 (the 2007 Act). Further details are provided in the University 'Protection of Vulnerable Groups and Criminal Records Check Policy and Guidance', accessible via the following link: <http://www.st-andrews.ac.uk/staff/policy/hr/pvgandcriminalrecords/>. This policy also



covers PVG scheme membership for research that may involve children/vulnerable adults; children on work experience; summer school working; activities in school and nurseries etc.

- Proactive policies and procedures:

Young Student Information Sheet and Authorisation Form (**See Appendix 1**)

- Training

The University will take steps to ensure that all staff are aware of their responsibilities under this policy and where appropriate, will provide relevant training in line with this policy.

Additionally, Good Practice Guidance for those in contact with children / vulnerable adults is included in Appendix 2 of this policy.

3. Key definitions (please see Appendix 3 for a more comprehensive list of definitions)

3.1 Child

For the purposes of this Policy, children are defined as **young people under the age of 18**.

Scottish Law recognises that despite having full legal capacity at 16, young people under 18 can be vulnerable in certain situations. Young people between the age of 16 and 18 who are still subject to a supervision requirement by a Children's Hearing can be viewed as a child, and therefore those over the age of 16 may still require intervention to protect them. The priority is to ensure that a vulnerable young person who is, or may be, at risk of significant harm is offered support and protection².

3.2 Vulnerable Adult

It should be noted that a person may have a disability, physical and/or mental health problem and be able to safeguard their well-being and interests. It is the whole of an adult's particular circumstances which can combine to make them more vulnerable to harm than others.

Under section 3 of the Adult Support and Protection (Scotland) Act 2007, 'Adults at risk' are defined as adults over 16 years of age who:

- Are unable to safeguard their own well-being, property, rights or other interests;
- Are at risk of harm, and;
- Because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected³

²'National Guidance for Child Protection in Scotland, 2010'
<http://www.gov.scot/Publications/2010/12/09134441/3>. Accessed 16.8.16

³ 'The Adult Support and Protection Act, 2007. <http://www.gov.scot/resource/doc/1095/0059478.pdf> Accessed 17.8.16

All three elements of the definition must be met, and the presence of a particular condition does not automatically mean an adult is an 'adult at risk'.

For the remainder of this policy, the term 'Vulnerable Adult' will be synonymous with 'Vulnerable Adult at Risk'.

3.3 Harm / Abuse (a full definition of types of harm is provided in Appendix 3)

Under Section 53 of the Adult Support and Protection (Scotland) Act 2007 'harm' includes all harmful conduct and, in particular, includes:

- conduct which causes physical harm
- conduct which causes psychological harm (for example: by causing fear, alarm or distress)
- unlawful conduct which appropriates or adversely affects property, rights or interests (for example: theft, fraud, embezzlement or extortion)
- conduct which causes self-harm.

'Conduct' includes neglect and other failures to act, which includes actions which are not planned or deliberate, but have harmful consequences.

3.4 Radicalisation

This is defined in the Prevent Duty Guidance as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'⁴. It is recognised that children and vulnerable adults may be more likely to be drawn into radicalisation.

4. Responding to Specific Events, Concerns or Allegations

The University encourages all staff and students to respond promptly to any concerns regarding potential harm, as covered under this policy. All reports made in good faith will be dealt with fairly. However, the University recognises the possibility of malicious or vexatious complaints and any complaints identified as such will be treated seriously and may result in disciplinary action being taken against the complainant.

Any member of the University community found to have drawn a child or vulnerable adult into radicalisation or committed any act of abuse or harm towards them, will be subject to disciplinary action and that person may also be subject to criminal proceedings.

4.1 Reporting concerns

A 'Step-by Step- Guide for staff dealing with reported or suspected abuse / radicalisation is included in Appendix 4.

⁴Prevent Strategy, 2011

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf Accessed 20.8.16

In the event that a member of the University community has been informed that abuse of a child or vulnerable adult is taking place or that they are at risk of radicalisation, they must report this to the Designated Officer (see below). Examples of when a report should be made, include when:

- A child or vulnerable adult at risk discloses abuse;
- A person makes an allegation of abuse about a member of the University community;
- There are suspicions or indicators that a child or a vulnerable adult at risk is being abused; for example, where there are observable changes in a child or protected adult's behaviour that may be related to abuse; or
- the behaviour of any person towards a child or vulnerable adult at risk causes concern or there is suspicion that a child or protected adult is being harmed
- there are signs or behaviours which cause concern regarding possible radicalisation

If a member of staff or student is unsure of whether a matter should be reported, it is their responsibility to discuss their concerns with the Designated Officer.

Guidance on recognising signs of potential abuse or harm, including radicalisation is provided in Appendix 5.

4.2 Designated Officers

The role of Designated Officer is shared between the Director of Student Services, the Director of Human Resources and the Vice Principal Governance and Planning, or their deputy / nominated person.

- For matters involving **students**, the primary contact is:
Chris Lusk, Director of Student Services 01334 462020
- Where **employees** are involved, the primary contact is:
Mairi Stewart, Director Human Resources 01334 463096
- For matters relating to possible **radicalisation**, the primary contact is:
Mr Alastair Merrill, Vice Principal Governance and Planning 01334 462525

Liaison between the Designated Officers (including sharing relevant information, as deemed necessary), will occur in order to assess and manage risk, and to obtain a fuller picture of the concerns identified and parties involved.

4.3 Responsibilities of the Designated Officer (primary contact)

Once the matter has been referred to the Designated Officer (primary contact), they or their deputy/nominated person will investigate the matter further. This is likely to include:



- Gathering the details;
- Assessing risk and ensuring that the child/vulnerable adult is not in any immediate danger. Additionally, they will take any action deemed necessary in the circumstances, such as accessing the emergency services and liaising with other external agencies such as the Police and Social work;
- Liaising with others within the University, as appropriate;
- Contacting parents or guardian unless this may place the child/vulnerable adult in harm;
- Recording written records of all actions, discussions and decision-making rationale and keeping these in a secure location;
- Acting as the point of contact for any external agency throughout the investigation
- Referring the matter to be dealt with under the relevant internal procedure, including but not limited to Disciplinary Procedures, Fitness to Study or Fitness to Practice Procedures

Where appropriate, a referral will also be made to the relevant University Committee, as outlined below. This may be necessary in order to more fully assess risk and appropriate courses of action at an institutional level:

- For concerns regarding possible radicalisation, referral should be made to the University Prevent Compliance Group
- For other concerns regarding children or vulnerable adults at risk, referral should be made to the University Safeguarding Operations Group (USOG)

Whilst the composition of these committees will vary depending on individual cases, they may include the following staff or their nominee:

- Vice Principal, Governance & Planning
- Proctor
- Director of Student Services
- University's representative to the Scottish Higher Education Prevent Working Group - Chief Legal Officer
- Equality and Diversity Officer
- University Security Manager
- Director of Human Resources
- University Chaplain (where the referral involves a faith issue)

4.2 Confidentiality

Any initial disclosure of suspected harm or radicalisation to a member of the University community should be treated seriously and with sensitivity. Where concerns exist regarding risk to the welfare of the child / vulnerable adult or where there are concerns about the individual being drawn into radicalisation, the safety of the individual and/or the safety of other members of the community takes precedence, and confidentiality may be breached.

Therefore it should be made clear to the disclosing person and the child or vulnerable adult involved, that confidentiality cannot be guaranteed. They should be made aware that relevant information may require to be shared, on a need-to-know basis, within the University and with external agencies.



Information disclosed will comply with the Data Protection Act, 1998 and in accordance with the University data protection code, which can be accessed via the following link:

<http://www.st-andrews.ac.uk/media/data-protection/documents/student-confidentiality-code.pdf>

Appendix 1

Young Student Information Sheet and Authorisation Form (2015-16)

Student's name

Date of Birth

Programme of Study

In Scotland, students are generally considered to have full legal capacity, and to be capable of entering into contractual relationships such as a student-university relationship, at the age of 16. However Scots law also recognises that despite having full legal capacity at 16, young people under 18 can be vulnerable in certain situations. Enrolling at and attending university, particularly if this involves moving out the family home, can be a significant life change for all students but more so for those aged under 18 years (Young Students) and we wish to be clear what services we can, and cannot, provide for this age-group.

We have therefore outlined below particular issues that must be acknowledged and/or agreed to by any Young Student, and his/her parent/guardian, before the University will accept any application from a Young Student to study here. These terms are in addition to our other University Policies and Procedures, which all our students are expected to comply with.

1. Level of care and support

Prior to arriving at the University, the Young Student will be allocated a Support Advisor and will be provided with their direct contact details should he/she wish to discuss anything. Thereafter, during the initial few weeks of commencing studies at the University, any Young Student, like all of our students, will receive an induction to the University and their academic school. Introductions will be made to key staff (including support staff) and information will be provided on the support services we offer to all students.

However, the University is not in a position to offer substantial extra care, support or surveillance to students whose need is dictated solely by their age. The University will not act *in loco parentis* (i.e. will not fulfil the duties normally undertaken by a parent/guardian). In applying to study here and in agreeing to a Young Student's studying here, a Young Student/parent/guardian accepts that they are willing for them/their Young Student to receive the same degree of care and attention as the University gives its students aged 18 and over. It is important that the Young Student and parents/guardians of the Young Student understand the very adult environment that exists at a Scottish University and that they understand the course that they/their Young Student will be pursuing and what is involved in this.

2. Accommodation

Young Students may enter into leases for accommodation during their study at the University. It is entirely at the discretion of the Young Student and/or the parent/guardian of the Young Student whether the Young Student applies to be accommodated at our Halls of Residence or alternatively in private property.

If the Young Student is accepted to live in a student hall of residence, the Young Student/parent/guardian must realise that the Warden will not be *in loco parentis* and the Young Student will be expected to live as an independent adult – as the other students there do. Please also understand that the Young Student will be placed in accommodation containing both female and male students who are likely to be aged 18 years and over. The University will not undertake any enhanced supervision of Young Students over and above what it provides to all students resident in our Halls of Residence.

If a Young Student and/or parent/guardian of a Young Student wishes the Young Student to receive additional care, support or oversight, they must personally make arrangements and take responsibility for its provision and, in the case of a Hall of Residence, this must be agreed with the University as compatible with the institution and its other students.

3. Prohibited Behaviour

The Young Student must not:

- purchase, or attempt to purchase, alcohol as individuals must be 18 years old to purchase alcohol in Scotland; nor will he/she allow others to buy alcohol for them. The only permitted exception to this is if the Young Student is at least 16 years old and the alcohol is to be consumed in a restaurant with a meal in the company of a person over 18 years of age;
- purchase, or attempt to purchase, cigarettes as individuals must be 18 years old to purchase cigarettes in Scotland; nor will he/she allow others to buy cigarettes for them;
- access, or attempt to access, any content aimed at those aged 18 or over using our IT facilities or within our libraries; and

- hold any office in the University where Scots law provides that the position must be held by someone aged 18 years or over.

The University will seek to ensure that these laws are not broken on its premises, but will not be responsible for ensuring these laws are adhered to by individual students. It is the responsibility of the Young Student to identify themselves as a minor when appropriate and to obey all instructions issued to them concerning our premises. Failure to abide by these rules may be treated as a breach of regulations and dealt with accordingly.

4. Responsibility for Fees

The parent/guardian of the Young Student guarantees fulfilment of any obligation the student has to the University to pay it for fees or other sums, including fees for studying at the University or residing at our halls of residence and in accordance with the terms of the relevant contract.

Negotiation concerning contracts shall normally be undertaken with the Young Student, and when they have agreed, the contract will be deemed to have been underwritten and guaranteed by the parent/guardian. Generally, the University shall deem the Young Student competent to understand all aspects of the normal University process, to obey the University regulations, to be disciplined under University procedures and shall not as a matter of routine make contact with the parent/guardian concerning any matter. However, the University will take action to recover debts from the parent/guardian if the Young Student fails to pay them and will reveal relevant details to the parent/guardian if necessary to recover these debts.

5. Emergency contacts

The Young Student/parent/guardian must ensure that the University is supplied with emergency contact details of someone contactable in the event of a medical or other emergency and these details must be updated immediately in the event of any change. If the parents/guardians are not present in the UK, they should nominate a guardian in this country who will act for them if necessary. The named person cannot be a member of staff of the University of St Andrews. The Young Student/parent/guardian must agree for the University to be able, in an emergency, to arrange medical and other care for the Young Student, until contact is made with the emergency contact and the parent's/guardian's wishes ascertained.

6. Data Protection

Any personal information that we collect regarding our Young Students is processed fairly in accordance with the Data Protection Act 1998. The University owes a duty of care to its students and therefore cannot disclose any information about the Young Student (attendance, residence, academic achievement or any other information) to anyone, including parents/guardians without the prior written permission to do so from the Young Student. There are legally permitted exceptions to this rule: for example, if we are required by law or a court to disclose this information, or where we need to disclose personal information to protect the student's, or someone else's, vital interests. If we do

need to disclose any personal information belonging to the Young Student, we shall only disclose such information as is necessary in the circumstances. For more information on how we handle personal information, please read our Data Protection Code which can be supplied on request.

7. Health Care

Young Students should contact a local GP practice and dentist to register as a patient so that they can access healthcare while studying at the University.

8. International Students

If the Young Student is not from Scotland, our International Advisors in Student Services can assist with any questions or queries the Young Student may have. However, we have set out some practical information which we hope will be useful.

- Bank Accounts:- The majority of banks in the UK have current accounts designed specifically for those aged under 18. In most cases Young Students will be expected to go to the branch to open the account and should take with them a passport (with a valid visa if appropriate) and proof of address such as a council tax letter or utility bill (some banks will also accept a University enrolment letter). Some banks do have residential requirements that can make it difficult for international students who are in the UK on short-term courses to open bank accounts.
- Visa and Immigration Requirements:- Young Students from outside the EEA may require a visa to study at the University. Visas are issued by the United Kingdom Visas and Immigration section of the Home Office. Generally, the Young Student can submit an application for a Visa online. As part of this process the parents/guardian should provide written consent that the student can live and travel independently, but also, under section 55 of the Borders, Citizenship and Immigration Act 2009, they must supply details of suitable care arrangements in place for travel, reception on arrival in the UK and living arrangements while here. Where the University is sponsoring the Young Student for a Tier 4 student visa, we are required to keep a copy of that letter from the parents/legal guardian. This consent letter will be requested by the University once the offer of study has been made unconditional and has been accepted.
- Travelling to the UK:- When arriving at a Scottish airport each passenger will have to go through immigration where the passport and visa will be checked, and then customs. For information on entry and customs rules, including what you can and cannot bring into the country please refer to the HMRC Website listed below.
- Getting to the University: - The nearest airports to the University are Dundee Airport (which only typically receives flights from Amsterdam and London) and Edinburgh International Airport. If the Young Student is an international student, it is likely he or she will fly into Edinburgh International Airport. There are shuttle buses and trams from the Airport to Edinburgh Haymarket and/or Edinburgh Waverly train stations. Trains from Edinburgh to



Leuchars are available. Once the Young Student arrives at Leuchars, they can get either a bus or taxi to St Andrews. If you need to contact the University during your travels please telephone +44 1334 46 2720.

9. Helpful Contacts and Links

We are confident that the University will be able to offer the student any guidance needed for day to day issues. However, the University would like to make sure that in the event of any emergency or problem, the Young Student knows who to contact for help.

The University would highlight the following central support people who are aware of the student's status as a Young Student and who we are confident can be trusted to act responsibly. They will treat anything told to them with discretion and sensitivity and will make it a priority to address any genuine difficulties the Young Student is having. If you are a Young Student, please do not hesitate to contact them over anything that is troubling you.

The ASC (The Advice and Support Centre) theasc@st-andrews.ac.uk Tel +44 1334 46 2020

The Warden of your allocated hall (where appropriate)

The Support Advice team – support.advice@st-andrews.ac.uk Tel +44 1334 46 2720

Useful documents or links

- Child Protection Policy: <http://www.britishcouncil.org/africa-child-protection-policy.pdf>
- Home Office Guide on Children Travelling to the UK:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224634/Children_travelling_to_the_UK_leaflet_A5_WEB_final.pdf
- British Council Guide on Travelling to the UK:
<http://www.educationuk.org/global/articles/travelling-to-the-uk/>
- HMRC Website – Banned or Restricted Goods: <http://www.hmrc.gov.uk/customs/banned-restricted.htm>
- NHS Inform: <http://www.hris.org.uk/patient-information/information-about-health-rights/>



Please complete the authorisation form enclosed and return as directed.



Annex to the Young Student Policy

Under 18 - student authorisation form

Please complete and sign the form below and return to the Admissions Office, St. Katharine’s West, The Scores, St. Andrews. **Please note we will not accept an application from a Young Student to study at the University of St Andrews until we have received this form duly signed.**

Student’s name:	
Date of Birth:	
Programme of Study	
Named UK contact	
Parent/Guardian’s address:	
Parent/Guardian’s home telephone number:	
Parent/Guardian’s work telephone number:	
Parent/Guardian’s mobile telephone number:	
Parent contact details (please give as much extra information as is possible for emergency contacts)	
I have read the details of this form and its preceding list of conditions. I understand them and I consent to the outlined conditions therein.	
Parent/guardian’s signature:	Date:



Student's signature:	Date:
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Appendix 2

Good Practice Guidance for those in contact with children and vulnerable adults

It is the responsibility of each member of the University community to act professionally and respectfully in their dealings with others.

They must ensure that they are aware of the relevant legislation and policies relating to children and vulnerable adults, as outlined within this policy. Additionally, they must attend relevant training necessary as part of their role.

General points to be aware of when coming into contact with children or vulnerable adults may include (please note, this list is not exhaustive):

- Treat all children and vulnerable adults with fairness, dignity, equality and respect
- Be sensitive to children or vulnerable adults' appearance, race, culture, religion and/or belief, sexual orientation, gender or disability
- Respect a child or protected adult's right to privacy
- Always work in an open environment. If you are in a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you. Where possible, leave the door open.
- Maintain a safe and professional distance in relationships with children and protected adults. You should not share your personal contact details and you should not connect with them over social media except where that is specifically related to the University activity
- When in a position of trust do not engage in sexual relationships with children and/or vulnerable adults. This is an abuse of a position of trust and a criminal offence
- Avoid rough, physical or sexually provocative conduct with children or vulnerable adults
- Do not provide children or vulnerable adults with access to alcohol (where that would be unlawful or inappropriate) or banned substances
- Avoid use of inappropriate language (including sexually suggestive comments), and challenging any unacceptable behaviour
- Where appropriate ensure you have written consent before taking photographs or making video or audio recordings
- If you are required to administer first aid ensure, wherever possible, that another employee is present, especially if you are concerned that necessary physical contact may be misconstrued

Appendix 3

Further definitions

1. Types of Harm / Abuse

The following are the main types of harm:

- a) **Physical Harm** - actual or attempted physical injury inflicted non-accidentally to an adult at risk (including spitting, hitting, slapping, pushing, kicking), misuse of medication or drugs (including depriving someone of prescribed or non-prescribed drugs, or giving the person dangerously large amounts of drugs and/or alcohol) and inappropriate restraint or sanctions.
- b) **Sexual Harm** - including inappropriate intimate contact, rape, sexual assault, sexual acts or human trafficking to which the adult at risk has not consented, could not consent or was pressured into consenting. It should be noted that it is a criminal offence⁵ for someone to have sexual relations with an adult in their care who suffers from mental disorder.
- c) **Psychological Harm** - including emotional harm, threats of abandonment or harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- d) **Financial or Material Harm** - including theft, fraud, exploitation, scams, pressure in connection with wills, property, inheritance, financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- e) **Neglect and Acts of Omission** - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, failure to share appropriate information, the withholding of the necessities of life, such as medication, adequate nutrition and heating. This includes self-neglect.
- f) **Institutional Harm** - repeated instances of poor care or unsatisfactory professional practice.
- g) A **forced marriage** is a marriage in which one or both parties do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress includes both physical and emotional pressure. It is very different from arranged marriage, where both parties give their full and free consent to the marriage.⁶
- h) **Using e-technology and bullying:** In addition to the above types of abuse, new technologies, digital media and the internet are an integral part of students' lives. This has enabled new forms of social interaction, through social networking websites, for example. These new

⁵ The Sexual Offences Scotland Act 2009

⁶ Protecting and Supporting Adults at risk in Tayside. Multi Agency Adult Support and Protection Protocol, November 2015.

developments bring a variety of risks, such as: bullying, coercion or intimidation through email and online (cyber-bullying); identity theft and abuse of personal information; exposure to obscene, violent or distressing material; pro-eating disorder, self-harm or suicide sites; and sexual exploitation by online predators – for example, grooming – often through social networking sites.

Any or all of these types of harm may be perpetrated as the result of deliberate intent, negligence or ignorance. This is not an exhaustive list of the types of harm which can affect adults at risk. Harm, mistreatment or neglect may occur as a result of specific incidents. However, concern may grow over a period of time and an accumulation of concerns may prompt a response in line with the contents of this protocol.

2. Prevent

The aim of the Prevent strategy is to ‘reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism... Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation’⁷

3. Prevent duty

This is defined as the duty imposed on universities and other public authorities by the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. The government has issued statutory guidance for all public authorities, and guidance specifically aimed at universities, on this duty.

4. Terrorism

Under the Terrorism Act 2000, terrorism is defined as 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.

Under this definition, 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.

The terrorist ‘action’ may be as a result of persons acting alone or as part of organised groups. Four domains are identified: (a) International terrorism, (b) Northern Ireland related terrorism, (c) Extreme Right Wing terrorism and (d) other forms of both secular and religious terrorism. The Terrorism Act 2006 created a number of ‘offences related to terrorism’, including encouraging terrorism, glorifying terrorism, disseminating terrorist publications, training for terrorism and preparing terrorist acts.

5. Extremism

⁷ Prevent Strategy, 2011

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf Accessed 20.8.16

In the 'Prevent Duty' guidance, extremism is defined as '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. Also included in the definition of extremism are calls for the death of members of the UK armed forces, whether in this country or overseas'.

Appendix 4

Dealing with reported or suspected abuse / radicalisation

Step-by-Step Guide

It is important to ensure that any declaration of suspected harm and/or being drawn into radicalisation is treated seriously and sensitively. The limits of confidentiality should also be explained, as outlined above.

It should also be recognised that a declaration may be made to any member of the University community, in which case the institution is considered to have been informed.

If a student presents with a critical situation and is requiring medical treatment, First Aid treatment must be the first step. Each Department will have a designated 'First Aider'. If an emergency situation arises, any member of staff can call the emergency services. Likewise, if any criminal act is suggested, the Police can be informed, in accordance with the University policies and procedures outlined in this Policy.

1. Recognise

All those in contact with children and/ or vulnerable adults must ensure that they are familiar with the potential signs of abuse or harm, as outlined in **Appendix 5**.

- Listen carefully and respond sensitively without expressing an opinion and without imposing your views and values;
- Do not ask direct and invasive questions. These can prevent the person from telling the full story and can also trigger trauma symptoms;
- Encourage, give lots of time and don't pressurise;
- Be aware that, for various reasons, disclosing such information can be difficult:
 - the person may be low in self-confidence;
 - s/he may have poor communication skills;
 - s/he may not expect to be believed;
 - there may be a background of threat or coercion;
 - there may be 'secondary gains' such as presents, power or attention;
 - s/he may be protecting others, including an abuser/radicaliser or other potential victims;
 - the experience may have become a normal reality;



- Stay calm and keep listening, without expressing whatever shock, disgust or alarm you may personally feel;
- Be honest about needing to tell other people and reassure the person that you and others will try to keep him/her involved in the decision-making process;
Under no circumstances should you contact or confront the alleged abuser/radicaliser, even if s/he is known to you or is a student / staff member of the university

2. Record

Make a written record of your concerns as soon as possible after the conversation. This record should include the following information:

- Appropriate personal details e.g. name; age; address; ID number. If appropriate, telephone number; email address
- The nature of the concern
 - What has been told to you, using quotations where possible and being careful to be objective and factual
 - Be objective; do not make assumptions; do not include personal opinions and interpretations. You may refer to any signs of abuse (see Appendix 2)
- The source(s) of information about the concern
- Any advice you have given to the child / vulnerable adult / student
- What you have discussed with the child, vulnerable adult or student about confidentiality
- Names of staff with whom you have discussed the incident
- Details of the action you have taken or any referrals you have made (internal and external)
- Date and signature of the person making the record

3. Report

Individual members of staff should never deal with abuse disclosures or concerns about radicalisation in isolation and should always refer to the Designated Officer (primary contact) - **see section 4.2 for further information**. These are the only people who should deal with the case and report suspected abuse to the Social Work Department or the Police.

4. Refer

Once the matter has been referred to the Designated Officer or their deputy/nominated person, it is the responsibility of that person to investigate the matter further and take such further action as is necessary under the circumstances.

This may include:

- Assessing risk and ensuring that the child/vulnerable adult is not in any immediate danger. This includes taking any action deemed necessary under the circumstances, such as accessing the emergency services and liaising with other external agencies such as the Police and Social Work, as appropriate
- Gathering the details



- Liaising with others within the University, as appropriate
- Contacting parents or guardian unless this may place the child/vulnerable adult in harm
- Recording written records of all actions, discussions and decision-making rationale and keep these in a securely locked location
- Acting as the point of contact for any external agency throughout the investigation
- Referring the matter to be dealt with under the relevant internal procedure, including but not limited to Disciplinary Procedures, Fitness to Study or Fitness to Practice Procedures

Appendix 5

Recognising potential patterns and signs of harm (including radicalisation)

Please note that the following information relates to signs of possible harm only. They may not always be indicative of abuse and it is advisable to approach the issue with due care, seeking advice from the Designated Officer as needed.

The clearest expression of harm is a statement by the person themselves. Alongside the trust this person placed in the individual they have reported this to, goes the responsibility to escalate concerns to the Designated Person.

However, it is also recognised that suspicions of potential harm may come to light in other ways, which may include the following physical or behavioural signs (this list is not exhaustive):

- Unusual or suspicious injuries;
- Neglected or under nourished appearance;
- Dubious or inconsistent explanations for injuries or bruises;
- Becoming withdrawn, socially isolated and increasingly fearful (e.g. demonstration of fear by the adult at risk to another person or demonstration of fear of going home);
- A prolonged interval between illness/injury and presentation for medical care;
- Difficulty in interviewing the person at risk (e.g. another individual unreasonably insists on being present);
- Anxious or disturbed behaviour on the part of the person at risk;
- Inappropriate sexual awareness

In addition, it is important to bear in mind the **potential risk of radicalisation** amongst children and vulnerable adults at risk. It is impossible to point to indicators that demonstrate for certain that a person is being drawn into terrorist or extremist ideologies or potential radicalisation. However, factors to consider may include:

- Has there been a recent and noticeable change in the student's behaviour?



- Have they become withdrawn or isolated from/hostile to teaching staff, friends/ peers?
- Have they been frequently absent from tutorials? Have they suffered health problems (including mental health issues)?
- Is the student an ‘adult at risk’ of harm, as defined in the Adult Support and Protection (Scotland) Act 2007? This might make them more vulnerable to being drawn into extremism.
- Have they expressed intolerance towards more moderate views, or have they demonstrated extreme views regarding a section of society or government policy?
- Have they made any open statements suggesting a desire/intent to take part in or support extremist activity, for example in tutorial discussions or in written work?
- Is there evidence that they have been downloading, viewing or sharing extremist propaganda on the internet, including on social media sites?
- Has the student been found to be in possession of extremist literature?
- Does the student have any known connections with proscribed terrorist organisations or groups that hold or promote extremist views?
- If the student has been accessing extremist websites, might there be a good reason for them doing so (e.g. for academic or study purposes)? If so, has this been approved?
- Are there reports of concerns from other individuals about the student’s behaviour?
- How serious and credible is the information available to the University, looked at as a whole? Is there a genuine concern that the student may be being drawn into extremism?

NB: Where there is credible information that an individual has committed or is about to commit an offence under the Terrorism Act 2000, then the University has a duty to report this to the Police. CONTEST is The UK Government’s counter terrorism strategy, published in 2011. The strategy comprises the four ‘P’s as below:

Prevent	Pursue	Protect	Prepare
Aim: To “prevent people from becoming terrorists or supporting terrorism. That will also require challenge to extremist ideologies which can be made to justify terrorism and intervention with some extremists who are moving into terrorism.”	Aim: This means detecting and investigating threats at the earliest possible stage, disrupting terrorist activity before it can endanger the public and, wherever possible, prosecuting those responsible.	Aim: “To strengthen protection against a terrorist attack in the UK or against its interests overseas and so reduce their vulnerability. The work focuses on border security, the transport system, national infrastructure and public places.”	Aim: “To mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase the UK’s resilience so we can recover from its aftermath.”

Appendix 6

University Equality Statement

The University of St Andrews is fully committed to respect and fair treatment for everyone, eliminating discrimination and actively promoting equality of opportunity and delivering fairness to all.

In addition to being compliant with the equality laws; public duties; and Human Rights Acts (Universal and European), the University also supports diversity and promotes equality of opportunity for all staff, casual/bank or temporary workers, students and visitors regardless of their:

- ‘Protected Characteristic’ (Single Equality Act):
 - Age
 - Disability
 - Gender Reassignment
 - Marriage and Civil partnership
 - Pregnancy and Maternity (including Paternity)
 - Race (colour, ethnic or national background)
 - Religion or Belief (including non-belief)
 - Sex/Gender
 - Sexual Orientation
- Caring responsibilities for a ‘Protected Characteristic’ including dependants
- Socio-economic background/grouping
- Union activity
- Unrelated spent criminal convictions

The Equality & Diversity Inclusion Policy outlines the responsibility for promoting inclusive environments, which are free from discrimination for our national and international staff; casual/bank or temporary workers; students; and anyone associated with the University (e.g. visitors, contractors and service providers).

Full online policy webpage: <http://www.st-andrews.ac.uk/staff/policy/hr/equalitydiversityinclusion/>



Louise Milne
HR Business Partner
30 August 2016