



ACU Safeguarding policy

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ACU Safeguarding policy

Introduction

The ACU seeks to promote the safety and welfare of those who deliver and those who receive our services, protecting them from harm and all forms of exploitation, abuse and harassment. The ACU is committed to ensuring that we have a safeguarding culture that addresses, and has no tolerance for, power imbalances and dynamics that allow opportunities for such practices to take place.

The ACU is alert to the risks involved in its work, and the danger of the abuse of positions of trust and authority. We proactively seek to identify and mitigate against such risks by working towards the highest safeguarding standards.

We affirm that it is a primary responsibility at ACU to build a culture that is true to our values, where everyone can feel confident to report concerns, a culture where we respect and safeguard the rights and dignity of everyone who comes in to contact with the organisation

We believe that everyone without exception, have the right to protection from abuse, exploitation and harassment regardless of age, disability, gender, race, sexual orientation, religion/belief, pregnancy/maternity, marriage/civil partnership or gender reassignment.

Policy statement

Safeguarding

The ACU defines safeguarding as the actions we take to keep all children and vulnerable adults we come into contact with safe, including the proactive measures we put in place to ensure that our activities do not place them in harm's way. It includes actions for preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying upon both the people we are trying to help and the people who are working within our organisation. We believe that the duty of care extends to scholars, beneficiaries, staff and volunteers and the wider community including where down-stream partners are part of the activities and services that we deliver.

Mitigation of Risk

Safeguarding is a governance priority for the ACU. In support of our duty to safeguard, we commit to:

- ensure that everyone associated with the organisation is aware of their responsibilities and knows how to report and respond appropriately to issues of harassment and the sexual exploitation and abuse of children and vulnerable adults;
- ensure that anyone who represents our organisation knows how to behave appropriately towards each other, and towards our beneficiaries and scholars and are aware that they must never abuse the position of trust and authority that comes with being a member of the ACU Community;
- assess, reduce and manage the risks to vulnerable adults and any children that are associated with our activities;
- do everything within our control in order to make the ACU an organisation that is safe for all;
- ensure that our working culture is marked by zero tolerance of unacceptable behaviours, prioritisation of the needs of anyone who has been harmed by deliberate or inadvertent acts, openness about how we discuss and strengthen our safeguarding practices, and protection of those who raise issues through our whistle-blowing procedures;
- ensure that all usage of ACU's Information and Communication technology including laptops, mobile phones, cameras etc. are used in accordance with this policy. The use of these resources to access, produce, procure or distribute pornographic material is not permitted;
- ensure that all communication via any media, including social media is conducted in accordance with this policy;

- responding to any breach of this policy through disciplinary action being taken against staff in accordance with the ACU's Disciplinary Policy, up to and including summary dismissal for gross misconduct.

Purpose and scope

The purpose of this policy is to:

- protect all those with whom the ACU comes into contact, including beneficiaries and staff (and in each case including but not limited to children and adults at risk), from harm. This includes harm arising from:
 - the conduct of staff or Associated Personnel; and/or
 - the design and implementation of the ACU's programmes and activities;
- ensure that everyone involved with the ACU understands their responsibilities with respect to safeguarding; and
- establish a framework that supports everyone involved with the ACU to meet their safeguarding duties.

The scope of this policy means that it applies to all ACU staff and other representatives such as trustees, consultants and volunteers, who are required to act consistently with the ACU's requirements for safeguarding. The policy applies on a 24/7 basis as it applies to their professional and personal lives.

Where partner agencies deliver activities and services on behalf of the ACU they will be required to adopt and apply this policy or to apply their own policy of a similar standard, by prior agreement.

Where ACU managed scholarship schemes have Safeguarding policies that apply to their activities, the respective procedures for reporting and responding will clearly identify where the responsibilities for action lie.

The ACU will carry out appropriate due diligence on all grant recipients and partner bodies to ensure that it is confident that the grant recipient or partner body is capable of delivering the proposed activities or services and has in place robust systems of control, including adequate safeguarding policies and procedures. This is important whether or not the activities being supported involve children or adults at risk. See Appendix 1

Beneficiaries and parents/carers will be informed of this policy as appropriate. This policy will also be published on the ACU's website.

Principles

The ACU is committed to the welfare of children and vulnerable adults as well as all other adults at risk.

We will adhere to the following principles when dealing with issues of safeguarding:

- **Commitment to safety, health and welfare of all involved:** including (although not exhaustive) survivors of safeguarding violations, staff against whom complaints are made, and staff involved in managing and investigating complaints.
- **Professionalism:** adhering to relevant policy and standards at all times.
- **Respect for all involved:** all stakeholders shall be dealt with fairly and professionally, including individual/s against whom a complaint has been made.
- **Responsiveness:** we will take all concerns and allegations of abuse seriously and respond to them within a reasonable time, to give confidence to those affected.
- **Working in partnership:** with all our stakeholders including grant recipients and partner bodies.
- **Adherence to the law:** the ACU works in compliance with UK and international law, where relevant.
- **Equal access to services:** No child, adult at risk or group of children or adults at risk will be treated any less favourably than others in being able to access services which meet their particular needs.

- **Confidentiality and information sharing:** information relating to safeguarding incidents are handled confidentially, kept securely and shared only on a need-to-know basis; however, the ACU has a duty to share information with other agencies in order to safeguard children and adults at risk. The ACU also recognises that information sharing is essential for effective safeguarding and that data protection legislation is not a barrier to justified information sharing.

Safeguarding concerns

Safeguarding concerns are defined as possible breaches of the following ACU policies:

- Safeguarding Policy
- Dignity at Work Policy
- Equal Opportunities Policy, Discrimination and Harassment Procedure
- Public Disclosure (Whistleblowing) Policy
- Safeguarding Code of Conduct

Reportable concerns can include but are not limited to:

- Workplace violence and abuse
- Not treating members, scholars, partners or colleagues with courtesy, professionalism and respect
- Child abuse
 - Sex with persons under 18 years of age
 - physical abuse, emotional ill treatment, sexual abuse & exploitation, neglect, commercial or other exploitation
- Harassment:
 - Verbal harassment or bullying
 - Physical harassment
 - Unwelcomed sexual advances
 - Requests for sexual favours, or words, pictures or gestures of a sexual nature that are offensive or create a hostile work environment
- Sexual abuse, exploitation and harassment
 - Rape, sexual assault, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual act to which the adult has not consented or was pressured into consenting.
- On-line or cyberbullying
 - Cyber bullying is any form of bullying which takes place online or through smartphones and tablets.

The use of social networking sites, messaging apps, gaming sites and chat rooms such as Facebook, Xbox Live, Instagram, YouTube within personal and professional lives should adhere to the standards of the Safeguarding Code of Conduct and this policy.
- Abuse of trust
 - Distortion by fear or favour of a relationship of trust, in which one party is in a position of power or influence over the other by virtue of their work, their status or the nature of their activity e.g. an abuse of trust could be committed by a teacher, supervisor, manager etc.
- Psychological and emotional Abuse

- Threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks. This could include spiritual, witchcraft/ritualistic abuse.
- Modern slavery
 - Encompasses slavery, human trafficking, forced labour and domestic servitude.

Recognising a Safeguarding concern

It is important to be aware of the possible signs and symptoms of abuse while at the same time understanding that these signs are only *indicators* of possible abuse. Although there may be innocent reasons for these signs, they can still be used as a guide to assist in assessing whether abuse of one form or another is a possible explanation for an individual's behaviour. It is important to acknowledge that abuse may happen anywhere and may be carried out by anyone. *For guidance on the definitions and types of abuse, and for potential indicators of abuse, please refer to Appendix 2.*

All sexual activity with a child under the local age of consent is a sexual abuse and a criminal offence. An "under aged" child cannot legally give consent to sexual activity and all such activity is non-consensual and classified as rape. Where a reported concern clearly indicates the possibility of such behaviour the issue will be referred to the national or police authorities. Where it is unclear or where it later emerges during an investigation under these procedures, again there will a referral to national or police authorities and will normally lead to dismissal if proven.

Sexual activity with a child over the age of consent, where consent is given, is not a criminal offence but is deemed gross misconduct and a breach of the Safeguarding Code of Conduct and Safeguarding Policy. It will be investigated under these procedures and will normally lead to dismissal if proven. Mistaken understanding of age is not considered an exception to this policy.

Responsibilities associated with this policy

Required behaviour

All employees of the ACU will:

- Uphold the integrity and reputation of the ACU by ensuring that their professional and personal conduct is consistent with the organisation's values.
- Not engage in abusive or exploitative conduct.
- Ensure the safety, health and welfare of all staff members and associated personnel.
- Be responsible for the use of information, assets and resources to which they have access by reason of their employment with the ACU.
- Perform their duties and conduct my private life in a manner that avoids conflicts of interest.
- Uphold confidentiality.
- Avoid criminal activity.
- Undertake all mandatory training including Safeguarding training

Managers at the ACU will:

Managers at ACU have a leadership responsibility to establish the managerial and operational environment conducive to maintaining the safeguarding culture of the organisation.

Reporting responsibilities

It is a requirement of this policy that all potential breaches of this policy and safeguarding concerns and allegations have to be reported.

It is not the responsibility of individuals who have the safeguarding concern to determine if the safeguarding concern is founded or what to do next; rather, they are responsible for reporting them in accordance with this policy.

All concerns and allegations of abuse will be taken seriously and responded to appropriately. Individuals who raise concerns in good faith will never be subjected to any detriment as a result.

Reporting concerns and allegations can be done as follows:

- The ACU has appointed a **"Safeguarding Officer"** who is responsible for dealing with any safeguarding concerns or allegations – the Director of People, Tarrance Ryder-Downes. Tarrance can be contacted at:

acu-[safeguarding@acu.ac.uk](mailto:acu-safeguarding@acu.ac.uk)

or

+44 (0)20 7380 6712.

- Staff may report a concern through the Safeguarding Champion of their department.
- ACU Council Safeguarding lead.
- In addition they may report to their line manager where the issue does not involve that person.
- Whistleblowing - Anyone should feel able to raise concerns about poor or unsafe practice and potential failures in the ACU's safeguarding system and know that such concerns will be taken seriously by the senior leadership team and that they will not face any detriment or retribution for reports made in good faith. These concerns should be reported in accordance with ACU's Public Disclosure (Whistleblowing) Policy, which is published on the ACU's website.
- Additionally suspected wrongdoing can also be reported directly to the Charity Commission via its dedicated email address (whistleblowing@charitycommission.gsi.gov.uk).

Statutory basis

This policy is underpinned by the following legislation and guidance:

- HM Government statutory guidance, *Working Together To Safeguard Children* (August 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
- HM Government non-statutory guidance, *What to do if you are worried a child is being abused* (March 2015): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- Charity Commission policy paper, *Safeguarding Children and Young People* (July 2014): <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people>
- Charity Commission policy paper, *Strategy for dealing with safeguarding issues in charities* (December 2017): <https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/strategy-for-dealing-with-safeguarding-issues-in-charities>

- Charity Commission guidance, *How to report a serious incident in your charity* (June 2014; last updated October 2018):
<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>
- Charity Commission guidance, *Safeguarding and protecting people for charities and trustees* (December 2017; last updated October 2018):
<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

Further guidance

Within the UK

If a child or adult at risk is in immediate danger or there is an immediate threat of harm, a referral should be made to the local authority and/or the police immediately. If a crime is in progress or life is at risk, dial emergency services on 999.

In addition where there is a less urgent concern for a child, staff should contact the NSPCC's 24-hour helpline service on 0808 800 5000.

Policy monitoring and review

This Policy has been reviewed, approved and endorsed by the trustees and follows up-to-date sector guidance from BOND, Charity Commissioners and the Resource and Support Hub.

The application of the policy will be monitored by the Safeguarding Officer and Safeguarding Group who will report the same periodically to the Board of Trustees.

The policy will be reviewed by the trustees on an annual basis and additionally, as necessary, for instance when legislation changes or following any safeguarding incident. The trustees will undertake on-going monitoring to ensure that the related duties and responsibilities are being effectively implemented in practice and will remedy any deficiencies or weaknesses in its safeguarding arrangements without delay, not just at the next policy review date, should any be necessary.

In order to ensure that the policy meets best practice standards, and that implementation of the policy is at an optimal level, an external evaluation of the ACU's safeguarding culture will be undertaken on a biennial basis.

Appendix 1: Safeguarding policy for grant recipients and partner bodies

This agreement must be signed by all grant recipients and partner bodies

ACU is committed proactively to safeguard and promote the welfare of its beneficiaries, staff, and all those with whom it comes into contact. Our duty of care in this regard extends to those who deliver services and benefits on our behalf and those who provide access to services and benefits provided by ACU.

The ACU, therefore, requires staff, partner bodies, members of its governing body, suppliers and host institutions and recipients of its grants to act in accordance with its requirements for safeguarding.

Risk

[University/ Partner/ Grant Recipient XXX] is alert to the risks involved in its work, and the danger of those in positions of trust and authority abusing those positions and has appropriate measures of mitigation in place.

Safeguarding policies and procedures

[University/ Partner/ Grant Recipient XXX] has been provided with a copy of the ACU's safeguarding policy, which it has circulated to all personnel associated with [service/ activity]. [University/ Partner/ Grant Recipient XXX] has provided the ACU with a copy of its safeguarding policy or has responded to the ACU's request for safeguarding information. The [ACU Team Safeguarding Champion] and [University/ Partner/ Grant Recipient XXX]'s designated safeguarding lead have discussed effective protocols for safeguarding and have agreed that responsibility for safeguarding concerns arising at [University/ Partner/ Grant Recipient XXX] will lie with [XXX].

Reporting

[University/ Partner/ Grant Recipient XXX] will make its staff and other relevant people aware that they should immediately report any safeguarding concerns to [University/ Partner/ Grant Recipient XXX]'s designated safeguarding lead in accordance with [University/ Partner/ Grant Recipient XXX]'s safeguarding policy. [University/ Partner/ Grant Recipient XXX] will immediately inform the [ACU's Team's Safeguarding Champion] or, in their absence, the ACU's Safeguarding Officer of any safeguarding concerns that arise.

Responding

All concerns and allegations of abuse will be taken seriously and responded to appropriately by [University/ Partner/ Grant Recipient XXX]. Individuals who raise concerns in good faith will never be subjected to any detriment as a result [University/ Partner/ Grant Recipient XXX]'s designated safeguarding lead will consider all the available information and decide whether any action needs to be taken in accordance with [University/ Partner/ Grant Recipient XXX]'s safeguarding policy. This may involve reporting the concern or allegation to local law enforcement and/or safeguarding organisations. If appropriate [University/ Partner/ Grant Recipient XXX] will engage professional assistance to deal with any reported safeguarding issues. [University/ Partner/ Grant Recipient XXX]'s designated safeguarding lead will keep the ACU's Safeguarding Officer informed of any decisions or actions taken.

In cases involving ACU staff, serious incidents may require involvement of local law enforcement agencies. In cases where local law enforcement agencies do not wish to investigate, the ACU will conduct an internal investigation (jointly with [University/ Partner/ Grant Recipient XXX] if appropriate).

Human Resources Recruitment, Selection, Induction, Training and Disciplinary Measures

[University/ Partner/ Grant Recipient XXX] is committed to ensuring safe recruitment, selection and vetting of staff (e.g. obtaining references and, where appropriate, criminal record information), as well as the induction and training of staff in these policies. [University/ Partner/ Grant Recipient XXX] has the appropriate disciplinary measures in place to deal with breaches of these policies.

Governance, Oversight and Accountability

Charities and regulated institutions will adhere to the regulatory requirements for reporting and dealing with safeguarding issues that apply to their activities. [University/ Partner/ Grant Recipient XXX] has in place appropriate mechanisms for oversight, accountability and governance of this area of policy

Review

[University/ Partner/ Grant Recipient XXX] is aware of the following UK Charity Commission guidance and will adhere to the principles set out in that guidance: <https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/strategy-for-dealing-with-safeguarding-issues-in-charities>. The ACU will inform [University/ Partner/ Grant Recipient XXX] of significant changes to this guidance.

Appendix 2: Definitions and definitions of abuse and potential indicators

Definitions

For the purposes of this policy, the following definitions shall apply:

- A **“child”** is anyone who has not reached their 18th birthday.
- **“Safeguarding children”** means to:
 - Protect children from abuse and maltreatment;
 - Prevent harm to children's health or development;
 - Ensure children grow up with the provision of safe and effective care; and
 - Take action to enable all children to have the best outcomes.
- An **“adult at risk”** is anyone aged 18 or over who:
 - has needs for care and support (whether or not the local authority is meeting any of those needs);
 - is experiencing, or is at risk of, abuse or neglect; and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- **“Safeguarding adults at risk”** means protecting their right to live in safety and free from abuse and neglect.
- **“Staff”** means trustees, employees (temporary or permanent), volunteers, interns, temporary contractors/consultants, agency staff, student helpers or any other person working for or on behalf of the ACU in the UK and abroad.
- **“Associated Personnel”** means personnel in the UK and abroad who are associated with the ACU by virtue of being a recipient of an ACU grant (whether individually or through another entity) and/or being linked to a partner body.

Definitions of abuse and potential indicators

Definition of abuse: Abuse and neglect are forms of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm, or by failing to act to prevent harm. Children or adults at risk may be abused in 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 or adults at risk may be abused by an adult or adults or another child or children. Males and females can be involved in abuse. There are four types of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Signs of possible abuse in children include:

Physical abuse: unexplained injuries; injuries that are inconsistent with the explanation; injuries that reflect an object being used (e.g. an iron); bruising, especially on the trunk, upper arms, shoulders, neck or fingertips; burns/scalds, especially from a cigarette; bite marks; fractures; swelling and lack of normal use of limbs; untreated injuries; unusually fearful with adults; unnaturally compliant to parents/guardians; refusal to discuss injuries/fear of medical help; withdrawal from physical contact; aggression towards others; wears cover up clothing.

Emotional abuse: physical, mental and emotional lags; acceptance of punishments which appear excessive; over reaction to mistakes; continual self-depreciation; sudden speech disorders; fear of new

situations; neurotic behaviour (such as rocking, hair twisting, thumb sucking); self-harm; extremes of passivity or aggression; drug/solvent abuse; running away; bullying/aggression; overly compliant behaviour; overeating or loss of appetite; clingy; fearful/withdrawn; sleep disorders.

Sexual abuse: damage to genitalia, anus or mouth; sexually transmitted disease; unexpected pregnancy, especially in very young girls; soreness to genitalia area, anus or mouth; repeated stomach aches; loss of weight; gaining weight; unexplained recurrent urinary tract infections, discharges or abdominal pain; unexplained gifts/money; sexual knowledge inappropriate for the child's age; sexualised behaviour in young children; sexually provocative behaviour/promiscuity; hinting at sexual activity; sudden changes in personality; lack of concentration, restlessness; socially withdrawn; overly compliant behaviour; poor trust in significant adults; regressive behaviour, onset of wetting – day or night; suicide attempts, self-mutilation, self-disgust; eating disorders.

Neglect: tired/listless; poor personal hygiene; poor state of clothing; emaciation, potbelly, short stature; poor skin tone and hair tone; untreated medical problems; failure to thrive with no medical reason; constant hunger; constant tiredness; frequent lateness/non-attendance at school; destructive tendencies; low self-esteem; neurotic behaviour; no social relationships; running away; compulsive stealing/scavenging; multiple accidents/accidental injuries.

Signs of possible abuse in adults include:

Physical abuse: a history of unexplained falls or minor injuries; bruising in well-protected areas, or clustered from repeated striking; finger marks; burns of unusual location or type; injuries found at different states of healing; injury shape similar to an object; injuries to head/face/scalp; history of moving from doctor to doctor, or between social care agencies; reluctance to seek help; accounts which vary with time or are inconsistent with physical evidence; weight loss due to malnutrition, or rapid weight gain; ulcers, bed sores and being left in wet clothing; drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions.

Psychological/emotional vulnerability: isolation; unkempt, unwashed appearance, smelling; over meticulousness; inappropriate dress; withdrawnness, agitation, anxiety, not wanting to be touched; change in appetite; insomnia or need for excessive sleep; tearfulness; unexplained paranoia, excessive fears; low self-esteem; confusion.

Sexual abuse: disclosure or partial disclosure (e.g. use of phrases such as 'it's a secret'); medical issues, e.g. genital infections, pregnancy, difficulty walking or sitting; disturbed behaviour e.g. depression, sudden withdrawal from activities, loss of previous skills, sleeplessness or nightmares, self-injury, showing fear or aggression to a particular person, inappropriately seductive behaviour, loss of appetite or; difficulty in keeping food down; unusual circumstances (e.g. two service-users found in a toilet/bathroom area, one of them distressed).

Neglect: poor physical condition; clothing in poor condition; inadequate diet; untreated injuries or medical problems; failure to be given prescribed medication; poor personal hygiene.

Financial abuse: unexplained or sudden inability to pay bills; unexplained or sudden withdrawal of money from accounts; disparity between assets and satisfactory living conditions; unusual level of interest by family members and other people in the vulnerable person's financial assets.

