



UNIVERSITY OF
PLYMOUTH

Safeguarding Policy (including Prevent)

Version number	Status (draft/final)	Owning Directorate / Faculty		
2	Final	Academic Registry		
Summary of any amendments: This Safeguarding Policy has been merged with the former Prevent Policy, to create one overarching Safeguarding Policy including Prevent.				
Document objectives: This document outlines the approach to safeguarding (including compliance with the Prevent Duty) at the University of Plymouth, including: <ul style="list-style-type: none"> • The legal and institutional definition of safeguarding and associated terms • How the university enacts its obligations in relation to safeguarding and Prevent • The procedure to be followed in the event of a concern arising, including how to deal with confidential information • The responsibilities of students and staff, including those with specific roles • Governance arrangements and support available including training 				
Intended Recipients: Students, staff, volunteers, parents/guardians of students, and visitors				
Approving Body and Date Approved		University Safety Committee		
Date of Issue		July 2020		
Review Date:		2 years from above		
Contact for review:		Head of Student Services (University Prevent Lead and Designated Safeguarding Officer)		
Version	Date	Author(s)	Replaces	Comment
2	Jul 2020	Alice Ludgate	1.3	New policy, merging of Safeguarding Policy and Prevent Policy (both previously standalone)
1.3	Dec 2019	Laura Beahan	1.2	Updating of terminology, support services and role of Local Safeguarding leads
1.2	Jul 2019	Alice Ludgate	1.1	Added reference to 'Prevent', updated names of DSOs (approved by Board of Governors July 2019)
1.1	Feb 2019	Alice Ludgate	NA	Updated names of DSOs and added this covering version control and policy introduction
1.0	Jan	Alice	NA	New policy, approved by UEG

	2018	Ludgate		
--	------	---------	--	--

Contents

1. Our approach and philosophy	3
2. Safeguarding definition, including Prevent	4
3. Responsibilities.....	5
4. How this policy is used.....	7
5. Consent and confidentiality	8
6. Flowchart.....	8
7. Online safeguarding	9
8. Freedom of speech, external speakers and events.....	10
9. Placements, field trips and fieldwork – information for students	10
10. Record Keeping	11
11. Related departmental policies.....	11
12. Governance, support and training.....	11
Appendix 1: How to raise concerns	13
Appendix 2: Signs and indicators of harm, abuse and radicalisation.....	15
Appendix 3: Do’s and Don’ts.....	16
Appendix 4: What happens if I make a referral?.....	18
Appendix 5: Glossary.....	20
Appendix 6: Students under the age of 18.....	23
Appendix 7: Safeguarding Working Group membership	31

What to do if you’re worried someone is experiencing or at risk of radicalisation, harm or abuse

In any emergency situation, call 999. If you’re unsure, contact University Security on x3333 (or 01752 588400 externally)

In non-emergency situations, contact your Local Safeguarding Lead or contact one of the University’s Designated Safeguarding Officers (DSO) at safeguarding@plymouth.ac.uk. For more information, see Appendix 1.

If your concerns relate to Prevent / counter-terrorism and you cannot reach a DSO but need more immediate advice, telephone Devon and Cornwall Police Prevent Team who are happy to provide initial advice and guidance about Prevent and counter terrorism. Dial 101 and ask to speak to the Prevent Team or email facPrevent@devonandcornwall.pnn.police.uk

1. Our approach and philosophy

- 1.1. As part of our mission, we are committed to supporting and promoting the welfare and wellbeing of students, staff and visitors throughout our operations and environment, ensuring we can protect our learning community and encourage our people to flourish in their academic endeavours.
- 1.2. Harm or abuse could affect any of our students, staff or visitors (or third parties connected to these groups) and, as a result, we take the approach that “safeguarding is everybody’s business”.
- 1.3. The University has specific legal responsibilities in relation to part 5 of the Counter Terrorism and Security Bill 2015 and this is known as the ‘Prevent Duty’, whereby appropriate support is put in place to those individuals who are identified as being vulnerable to radicalisation
- 1.4. This policy seeks to safeguard staff and students from risks of harm, abuse and radicalisation, whilst at the same time protecting freedom of speech and embedding the promotion of positive learning and community relations.
- 1.5. In the context of safeguarding, staff and students may meet, work and conduct research with children or adults at risk of harm, abuse or radicalisation. Staff and students supervising or undertaking placements in a clinical setting, health care, teaching and social care will likely come into regular contact with those at risk of harm, abuse or radicalisation. Because of our broad activities, we have chosen to set out our responsibilities, including compliance with legislative requirements, through this safeguarding policy.
- 1.6. Whilst the majority of our student population are adults, a small minority start their studies with us under the age of 18. A number of our students may also be defined as ‘adults at risk of harm or abuse’ within a safeguarding context.
- 1.7. Similarly, our workforce may include adults who are at risk of harm or abuse within a safeguarding context, or there may be third parties linked to our workforce or students where safeguarding concerns arise, for example a family member, child or other dependent, a friend or acquaintance.
- 1.8. Research activity of the university may include children, young people and adults at risk of harm or abuse; the safeguarding of these groups is paramount and the University Research Ethics and Integrity Committee (UREIC) is responsible for developing, implementing and monitoring ethics

and integrity policies which enable our safeguarding responsibilities to be upheld within the context of research.

- 1.9. We work in partnership with other organisations including the University of Plymouth Students' Union and safeguarding partnerships, normally Plymouth or Cornwall. We also work closely with the Department for Education Regional Prevent Coordinator and we are a member of the local Prevent Partnership.
- 1.10. We are pleased to work with other important stakeholders such as our trade union colleagues. University subsidiary companies have separate policies.
- 1.11. We exercise our duty of care along with other legal obligations such as those owed under the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014, Health and Safety at Work Act 1974, the Counter Terrorism and Security Bill 2015, the Equality Act 2010, the Data Protection Act 2018, the Equality Act 2010, the Mental Capacity Act 2005, and the Protection of Freedoms Bill.
- 1.12. This document sets out how we deal with concerns of harm, abuse and radicalisation, and the type of action we may take to risk assess and provide support.
- 1.13. This policy is not directed at any specific ideology, religion, religious group, faith or at the proponents of any other sets of belief. The policy does not allow for any individual or group of individuals to be marginalised, stigmatised or excluded from the learning and research community.
- 1.14. All concerns raised will be treated seriously and proportionately, including reported promptly to the appropriate local authority Prevent teams, where necessary. Sharing concerns with an external agency does not imply wrongdoing or the passing of responsibility, but rather to seek the most effective and appropriate support for an individual.
- 1.15. This policy is owned by the Board of Governors. Responsibility for monitoring resides with the University Safety Committee on behalf of the University Executive Group. Day to day review is overseen by the Safeguarding Working Group (see Appendix 7), led by the Head of Student Services (also the University Prevent Lead and Designated Safeguarding Officer).

2. Safeguarding definition, including Prevent

- 2.1. We define safeguarding as “the act of protecting people’s health, wellbeing and human rights” and we practice safeguarding by supporting people to live

free from harm, abuse, neglect and radicalisation. This includes preventative measures as well as risk assessment and response to incidents, including referral to appropriate Children and/or Adult Social Care services and the local Channel/Prevent Teams in the local authority and police.

- 2.2. Two groups of people are defined within legislation governing safeguarding, they are:
 - Children
 - Adults at risk of harm or abuse
- 2.3. In addition, we recognise 'Prevent' as the anti-radicalisation agenda embedded in the Counter Terrorism and Security Bill 2015, and referred to as 'Prevent' in this policy. A person may become at risk of exploitation, harm or abuse in relation to violence, incitement to violence, terrorism, and incitement to terrorism or other activities that may result in violent behaviour or terrorist activities in the name of an ideology or a set of beliefs.
- 2.4. This document explains how we approach safeguarding including Prevent, which we see as part of an overarching aim to protect the welfare of members of our community. See also Appendix 5 'Glossary'.
- 2.5. We are proud to be diverse. Safeguarding is a term established within UK legislation and it is important for us all to remember that the concepts associated with safeguarding, e.g. harm or abuse, may be interpreted differently within different cultures. In itself, safeguarding is not a term used in all countries.
- 2.6. We advise staff to bring all potential safeguarding concerns to the attention of one of the safeguarding team (Appendix 1) where such concerns, interpretations and potentially divergent beliefs may be understood as part of any risk assessment and further action. Staff unsure about whether their concern meets the threshold or definition of safeguarding should still raise their concerns to allow an assessment to take place and advice to be given.
- 2.7. Your role, in relation to safeguarding and Prevent, is not to make a decision, judgement or any conclusion about whether harm or abuse has taken place. Your role is to be alert to the signs that someone could be at risk and raise concerns to the right person, so that trained professionals can sensitively and appropriately assess the situation and respond accordingly.

3. Responsibilities

- 3.1. The role of Principal Designated Safeguarding Officer (PDSO) is undertaken by the Registrar and Secretary.

- 3.2. The role of Prevent Lead is undertaken by the Head of Student Services.
- 3.3. Those in the role of a DSO are listed in Appendix 1 of this policy. The responsibilities of the DSOs include:
- Undertaking relevant training in safeguarding and Prevent and ensuring their knowledge is kept up to date
 - Acting as a point of contact for those who have concerns and need advice, receiving information, recording information about concerns, risk assessing and taking appropriate action
 - Acting upon concerns and make a direct referral if there is immediate risk
- 3.4. Those in the role of a Local Safeguarding Lead are listed in Appendix 1. The responsibilities of local safeguarding leads include:
- Undertaking relevant training in safeguarding and Prevent and ensuring their knowledge is kept up to date
 - Acting as a point of contact for those who have concerns and need advice,
 - Acting upon concerns and make a direct referral if there is immediate risk and notify the central DSO team as appropriate in the circumstances
 - Supporting and promoting the implementation of this policy and procedure in their local area
- 3.5. **Managers** within the University will ensure staff are aware of the University's Safeguarding Policy and are able to refer concerns appropriately. Managers will build approaches within their team(s) that promote safeguarding and wellbeing, reducing the potential for harm or abuse. For example, adhering to the Disclosure and Barring Service Policy when recruiting staff.
- 3.6. **Staff** must take part in training deemed necessary for their role in relation to safeguarding, and speak to their manager or Academic Lead in the event they are unclear about any aspect of that training or this policy.

Staff must always refer to a local safeguarding lead or a DSO in the event they are concerned that someone* is at risk of harm/abuse.

All staff must speak to their Academic Lead, manager or a DSO if they require additional support or training in relation to safeguarding and/or Prevent.

*This includes anybody; staff must raise concerns if they are worried about students, colleagues, visitors, third parties (e.g. the child of a colleague). The

principle aim of this policy is to prevent harm or abuse from occurring or reoccurring, no matter the relationship between the person at risk and the university or where that abuse has or may take place.

4. How this policy is used

4.1. We will apply this policy in the following types of situation:

- When someone tells us or causes us to be concerned that they are at risk of, or experiencing, harm, abuse or radicalisation;
- When someone tells us that another person may be at risk of, or experiencing, harm, abuse or radicalisation;
- When someone discloses information involving themselves or family members, which gives rise to concern that a potential perpetrator may be harming or abusing vulnerable individuals;
- There are suspicions or indicators (see Appendix 2) that someone is being abused or harmed or is at risk of harm or abuse;

Please note: the indicators of abuse, harm or radicalisation are sometimes very difficult to recognise, they are not always 'clear cut'. It is not the responsibility of the university to decide whether a person has been abused, harmed or radicalised, but to raise concerns with appropriate services who can help.

- There are changes in somebody's appearance or behaviour that may be related to harm, abuse or radicalisation;
- A concern arises that an individual presents a risk of abuse or harm towards someone else in relation to, for example, his/her criminal convictions or downloading, possession or distribution of inappropriate images or extremist material.

4.2. Safeguarding concerns must be reported as soon as possible, and usually via email or telephone (see Appendix 1).

4.3. If there is an urgent concern outside of office hours, University Security and emergency services must be contacted. If a direct referral is made to emergency services, please notify safeguarding@plymouth.ac.uk.

4.4. Anybody wanting advice before making a referral is encouraged to talk to a local safeguarding lead or DSO, who can provide advice anonymously (if you would prefer not to reveal the identity of the person you are concerned about). **It is better to refer any concern and enable a risk assessment to take place than not to make one because of uncertainty.**

- 4.5. It is the remit of Children and Adult Social Care and/or the police to investigate safeguarding and Prevent-related concerns; a central DSO will undertake a risk assessment before making a referral to such an external agency, which may include seeking advice from the appropriate agency about whether a referral is appropriate.
- 4.6. For information about placements, field trips and fieldwork see Section 9.
- 4.7. Partner institutions, including colleges, will have their own safeguarding arrangements. For any student or employee within a partner institution (excluding international), any safeguarding concern should be reported to the Safeguarding Officer in the partner institution. If the employee or student feels this is inappropriate or they do not feel they have had a satisfactory response, they should refer directly to a central DSO for advice.
- 4.8. Any person holding a dual role, for example employed by the university and a student at the university, may raise a concern under this procedure.
- 4.9. If the safeguarding concern involves one or more of the central DSO team, the Vice Chancellor should be contacted.

5. Principles of consent and confidentiality

- 5.1. We prefer for the person or people involved in a safeguarding referral to be engaged with it being made, so will usually seek their consent before onward referral except where doing so may place them or others at greater risk.
- 5.2. The need to break confidentiality applies where the welfare of another person is at risk and where it is deemed appropriate to make a referral regardless of consent, in order to protect the human rights of a person or people.
- 5.3. Staff can raise a concern initially anonymously (not revealing the name of the person about whom they are concerned) to seek advice about next steps.
- 5.4. Only those who need to know, from a professional perspective, will be informed or receive written information about allegations, in accordance with legislative requirements.

6. Flowchart

You have a concern that someone is experiencing, or at risk of, radicalisation/harm/abuse.
--

You phone or email a local safeguarding lead or a central DSO for advice, which could in the first instance be anonymously (not revealing the identity of the person you're worried about)

<p>Local safeguarding lead will assess and either:</p> <ul style="list-style-type: none"> • Provide advice • Make a referral to the relevant authority (and notify the central DSO team) • Escalate to the central DSO team for advice 	<p>Central DSO will assess and either:</p> <ul style="list-style-type: none"> • Provide advice • Make a referral to the relevant authority
--	---

Local safeguarding lead or DSO will record the information about your concern and will usually email you after your telephone call, summarising the discussion. Local leads will cc. the central safeguarding email account: safeguarding@plymouth.ac.uk to ensure that all safeguarding matters are centrally recorded for audit purposes.

7. Online safeguarding

- 7.1 There are different risks presented by the internet in relation to safeguarding vulnerable people from harm, abuse and exploitation. Whilst the internet brings opportunities to overcome isolation, join communities of interest, access self-help, manage medical conditions and overcome other barriers in the physical world, it is well reported that harm and abuse can be very easy to carry out over the internet and can be difficult to track.
- 7.2 We encourage people to talk about their online activity particularly if they have questions about the validity of sources or are concerned about something they have seen/received. We recommend students and staff keep themselves safe online by using passwords and secure internet connections.
- 7.3 Anyone with a concern that they or someone else may be at risk of online harm, abuse or exploitation should report this to a Local Safeguarding Lead or DSO.
- 7.4 When working with under 18s online there are additional safeguarding factors that should be considered, see appendix 6
- 7.5 It is strictly forbidden that the university's website, IT facilities or other elements of the university's information management systems are used for

the promotion, planning or execution of violent extremism/radicalisation or any other forms of harm or abuse.

- 7.6 Student use of IT facilities must be done in accordance with the Student Code of Conduct and Disciplinary Procedure and Student Charter. Staff use is permitted in accordance with relevant IT and computing policies and terms and conditions of employment.
- 7.7 We may monitor systems, electronic communications and access to external electronic resources to establish facts, to prevent or detect crime, or to investigate or detect unauthorised use.
- 7.8 If requested by the police to remove or amend any statement on the university website which may appear to promote or encourage terrorism, we will promptly do so in accordance with the Counter Terrorism and Security Bill 2015.

8. Freedom of speech, external speakers and events

- 8.1 We are committed to the principles of free speech and will seek, so far as is reasonable practical, not to deny access to the institution's premises to any person on any ground relating to the belief of that person or the policies or objections of their representative body
- 8.2 In accordance with our External Speakers and Events Policy, external speakers will be risk assessed to ensure any risks of harm, abuse or radicalisation (i.e. the safeguarding of our community) are identified and mitigated.

9. Placements, field trips and fieldwork – information for students

- 9.1. In a placement or work-based learning environment, such as a professional or clinical setting, you are encouraged to find out the name of the local Safeguarding Officer.
- 9.2. Most care services/education providers will have a local safeguarding officer. Some other businesses, e.g. those who do not often interact with children or adults at risk of harm or abuse, may not. This does not mean that you do not need to raise any concerns of somebody being at risk of harm or abuse, if that concern arises.
- 9.3. In the event of you having a concern about safeguarding, you should report this to the Safeguarding Officer of the provider or employer, or to your manager/supervisor of the placement if there is no officer/you're unsure. If

your concern relates to a risk of vulnerability to radicalisation, you should contact the Safeguarding Officer or if there is not one, to a DSO.

- 9.4. If you do report a concern whilst on placement you must also report this to your supervisor, regardless of the response from the placement provider, so that we can support you.

10. Record Keeping

- 10.1. The central DSO team securely store written records of any safeguarding concerns for as long as necessary for the purpose for which each written record was obtained, as legally required or lawfully permitted. This is done in accordance with the Records Retention Schedule and Privacy Notices.
- 10.2. Such records are held centrally and securely within Student Services, separate from an employee or student's personal records.
- 10.3. Any referral to the local Children or Adult Safeguarding Boards/Social Care Services/Police will include full details of any information the university is aware of/has had reported in relation to the concern(s).

11. Related departmental policies

- 11.1. A number of University departments have policies which may relate to a safeguarding concern and from time to time we may refer to these, for instance:
- University Registry: Academic Regulations; Data Protection Policy, Student Code of Conduct and Disciplinary Procedure; Complaints Procedure; Student Sexual Violence & Misconduct Policy, Study and Wellbeing Review Policy
 - HR Department: Anti-Bullying and Harassment Policy; Personal Relationships at Work; Disciplinary Policy; Prevent Policy; Disclosure and Barring Service Policy; Health and Safety Policy
 - Technology and Information Services: Information Security Policy; Use of Computers Policy

12. Governance, support and training

- 12.1. The University Safety Committee is responsible for this policy and the following activities:
- Policy review including updating to reflect legislative, institutional and other changes;
 - Making recommendations about safeguarding and Prevent training
 - Monitoring this policy's implementation

- Receiving and discussing serious case reviews to identify lessons/learning points and improvements
 - Receipt and review of an annual report relating to safeguarding and Prevent including oversight of the University's Prevent Risk Register and Action Plan
- 12.2. All staff, students and volunteers (including Student Ambassadors and those participating in volunteering such as Housing Assistants) whose roles and responsibilities include contact with children and adults at risk of harm or abuse, will receive training and guidance appropriate to their role.
- 12.3. Staff identified as key to the delivery of the Prevent Duty will receive appropriate training.
- 12.4. Anybody who wishes to receive further training or who is unsure about any part of this policy should contact their manager, local safeguarding lead or central DSO team for advice.
- 12.5. The prospect of dealing with safeguarding or hearing about radicalisation, harm or abuse can be very worrying. Hearing of, or dealing with, a concern can generate stress, anxiety or upset for those involved. It may also trigger upsetting memories.
- 12.6. Given the nature and sensitivity of safeguarding, it is impossible to predict the support that may be required for someone; the University therefore offers a range of support in order to best meet the needs of staff and students. This includes:
- You can access free online support with Big White Wall for confidential access to a **24/7 online community and professional support**. To join, simply go to www.bigwhitewall.com and sign up under 'organisation' with your university e-mail address.
 - The **Student Wellbeing Service** is open Monday to Friday. You can visit the Student Hub in the Library or make contact remotely: 01752 587676 or studentservices@plymouth.ac.uk
 - Our **Pastoral and Spiritual Support Team** are available at 1 Kirkby Terrace, or you can follow the team on Facebook [@Plymouthunichaplaincy](https://www.facebook.com/Plymouthunichaplaincy)
 - **Human Resources** provides a range of support for all employees: <https://liveplymouthac.sharepoint.com/sites/u114/SitePages/Site%20Home.aspx>

Appendix 1: How to raise concerns

Please remember it is essential to raise all concerns, however unsure you might be. It is not the job of the university to draw conclusions but to allow trained professionals to sensitively and proportionately intervene as necessary, to protect the safety and health of those at risk.

Who to contact?

If you have concern about a **student** you can contact the safeguarding lead within your school, Faculty and directorate, see below (or you can email safeguarding@plymouth.ac.uk).

If you have a concern about a **member of staff**, you should contact Kirstie Spencer in Human Resources (Kirstie.spencer@plymouth.ac.uk).

Local Safeguarding Leads (for concerns about **students**) are:

<p>Faculty Arts, Humanities and Business:</p> <p>Faculty Office Plymouth Institute of Education School of Art Design and Architecture School of Humanities and Performing Arts School of Law, Criminology and Government Plymouth Business School</p>	<p>Miles Opie (dual role) Miles Opie Simon Standing Jameson Tucker Lisa Deblasio Danielle Bishop</p>
<p>Faculty of Health:</p> <p>Faculty Office School of Biomedicine Sciences School of Dentistry School of Health Professions School of Medicine School of Nursing and Midwifery School of Psychology</p>	<p>Louise Smith Gail Rees Cathy Coelho Sally Abey Dr Alina Beltechi Andy Nichols Alastair Smith</p>
<p>Faculty of Science and Engineering:</p> <p>Faculty Office School of Biological and Marine Sciences School of Engineering, Computing and</p>	<p>Pat Shepperd Jon Ellis</p>

Mathematics School of Geography, Earth and Environmental Sciences	Nick Outram Meriel Fitzpatrick
Directorates Academic Partnerships External Relations Academic Registry Human Resources	Julie Swain Ruth Bennett Alice Ludgate, Laura Beahan, Anne Bentley Kirstie Spencer

What information should you provide?

A DSO or local safeguarding lead will usually ask you for:

- The name of the person you're worried about (if known)
- The name of anyone else involved (if known), e.g. witnesses
- If you have it, any more information about the person you're worried about e.g. their age, sex, religious affiliation, whether they have a disability
- What it is that has worried you, for instance what you heard, observed or something that was reported to you by someone else
- Any relevant dates or times
- Details of any actions you (or others) have already taken
- Whether the person you're concerned about knows you're contacting a DSO (NB. In the case of Prevent concerns, do not discuss your concern with the person you're concerned about before seeking advice from the Prevent Lead)

In any emergency, call 999. If you're unsure, contact University Security on 01752 588400

Appendix 2: Signs and indicators of harm, abuse and radicalisation

This section describes *potential* signs and indicators of harm, abuse and radicalisation.

How you might become aware of harm or abuse taking place?

- Someone might describe abuse to you
- A friend, family member or someone else may raise a concern with you
- You might notice injuries or physical signs of concern
- You might notice a change in behaviour which concerns you that something might be wrong

The clearest sign of abuse is an actual report or direct statement. If someone confides in you, you have a responsibility to respond to the disclosure regardless of the nature of the relationship you have with the person in question.

Your role is never to decide whether there is enough evidence or if the allegation is supported by evidence. Your only responsibility is to raise the concern, to allow that person to be protected.

Signs of abuse are not always obvious and a person may not tell anybody what is happening to them, nor may they necessarily know that what is happening is abuse.

What are the signs or indicators of vulnerability and being at risk of becoming involved in extremism? They can sometimes include a combination of factors:

- Being at a transitional time of life and being influenced or controlled
- Being part of social networks involved in extremism
- A need for identity, meaning and belonging, feelings of injustice/under threat
- Mental health issues (where support from extremist groups offers relief)
- A desire for status and/or for social or moral change
- Opportunistic involvement
- A desire for excitement, risk-taking behaviour and adventure
- A need to dominate and control others

You can find out more by booking training “Safeguarding: Prevent for University Staff” on employee self-service.

For more information about spotting the signs, visit <https://www.ltai.info/spotting-the-signs/>

Appendix 3: Do's and Don'ts

If someone discloses that they are experiencing harm, abuse or are feeling vulnerable to radicalisation, or if there are suspicions that someone is at risk of harm, abuse or radicalisation, consider the following guidance:

Do	Don't
In the case of a direct disclosure, be supportive	Panic
Move to a quiet, private place if you are not currently somewhere you can speak confidentially	Ask closed questions or repeatedly question the individual, substituting their language for your own
Take what the child or adult says seriously	Delay
Remain calm	Promise to keep secrets
Reassure them that it was right to tell someone	Ask them to repeat the story unnecessarily
Explain what will happen next i.e. that you may refer to a Designated Safeguarding Officer	Express any of your own opinions
Write down word-for-word immediately afterwards what was said, including the time, place, and any other observations: sign and date this record	Discuss with anyone else what was told to you, other than with the Designated Safeguarding Officer and other relevant personnel
Pass the referral to the Designated Safeguarding Officer	Start to investigate
Seek support for yourself from the Designated Safeguarding Officer	Contacted the alleged abuser or other people mentioned/involved
Ask the individual to clarify anything you might have misunderstood (but do not substitute their words for your own)	Ask closed questions or repeatedly question the individual, substituting their language for your own
Keep contemporaneous (word for word) records	Substitute the language used by the child or adult with that of your own

Appendix 4: What happens if I make a referral?

What happens next?

- We will make a record of your conversation or, if you emailed the central team or named DSO, they will probably telephone you to discuss the email – as a minimum, the DSO will reply to you to confirm they have received your email
- The information you have provided will be reviewed and assessed by that person and they may seek advice about what to do next, from the local authority
- If the concern appears to meet the threshold for a safeguarding issue, the DSO or local lead will complete a referral to the appropriate team, providing as much information as is known by the university in relation to the concern(s)
- From there, the local authority and/or police team will decide what if any action to take (the person of concern may already be known to them, for example) to safeguard the vulnerable people who are at risk of harm or abuse
- If the concern relates to a risk of radicalisation and/or being drawn into terrorism, a referral may be made to 'Channel'. Channel seeks to provide advice and guidance to individuals to turn them away from violent extremism based on ideology or beliefs, before they commit a criminal act. Channel takes a multi-agency approach to safeguard individuals who are at risk of violent radicalisation or violent extremism.
- If a concern is raised in good faith which subsequently is found to have no basis for taking forward, no further action will be taken. If any allegations are found to be vexatious or malicious, disciplinary action may be taken in accordance with relevant staff and student disciplinary procedures.

Will my identity be shared?

- We recognise that you may be worried about the people involved knowing that you raised a concern to a DSO or local lead
- We are required to share your name with the local Children/Adult Social Care/Police teams if a referral is made
- If possible, your identity will be kept confidential, aside from sharing with the relevant services
- You will be supported by the university particularly if you have to take part in any further investigation, which may happen if the matter proceeds to a criminal investigation

We hope that through this policy, the support of the university is clearly emphasised and our interest is to protect the wellbeing, welfare and safety of all those involved in

our activities – whether as someone making a referral or as the person who we are concerned about.

Appendix 5: Glossary

- **Abuse** is the intentional or unintentional misuse of the power and control that one person has over another; it does not matter whether the perpetrator intended the abuse to take place or not. There are many types of abuse which can include physical, sexual, psychological, financial or material, neglect, discriminatory, organisational and domestic.
- **Bullying** is threatening, abusive, intimidating, undermining or insulting behaviour that may be an abuse of power, position or knowledge (see the University's Anti-Harassment and Anti-Bullying Policy and Procedure).
- **Child** is a person under the age of 18 (their living arrangement or attendance at University does not change the person's status as a child).
- **Discriminatory abuse** can manifest itself in many ways however it is motivated by unfair and inappropriate attitudes, feelings or behaviour towards an individual due to their race, gender, religion, age, sexuality or disability. It can take include serious, repeated or pervasive discrimination, which leads to significant harm or exclusion from mainstream opportunities or provision of poor standards of service/care.
- **Domestic abuse** includes psychological, physical, sexual, financial, emotional abuse and so-called 'honour'-based violence committed by a family member, carer or intimate/ex-partner, regardless of gender or sexuality. It can be controlling, coercive, threatening behaviour which implies that violence might occur or may have already occurred.
- **Emotional abuse** is persistent emotional ill-treatment such as to cause severe and persistent adverse effects on a child/vulnerable adult's emotional development.
- **Exploitation** is the deliberate maltreatment, manipulation or abuse of power and control over another person; it is taking advantage of another person or situation usually, but not always, for personal gain. Exploitation may include slavery, being controlled, forced or compulsory labour, domestic violence, sexual violence and human trafficking.
- **Female Genital Mutilation (FGM)** is the deliberate mutilation of female genitalia; often the removal, injuring or cutting of the labia and clitoris where there is no medical reason for this to be done. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse.
- **Financial abuse** is the use of a person's property, assets, income, funds or any resources without their informed consent or authorisation; it may include theft, fraud, internet scamming, exploitation, pressure in connection with wills, property

or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Forced marriage** is one in which one or both parties are married without their consent (unlike an arranged marriage where both parties consent to third party assistance in identifying a spouse); no-one can consent to marriage on behalf of someone else.
- **Grooming** is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, exploitation or trafficking.
- **Harm** is the ill-treatment or the impairment of health or development which can be a single act, repeated acts of a similar or different nature, intentional or unintentional, or an act of neglect or failure to act.
- **Harassment** is unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual (see the University's Anti-Harassment and Anti-Bullying Policy and Procedure).
- **Historical abuse** is abuse that took place in the past, which must still be referred using the reporting procedure.
- **Peer abuse** is carried out by children and young people towards one another and must always be taken as seriously as abuse perpetrated by an adult.
- **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and psychological needs, likely to result in the serious impairment of their health or development, such as failing to provide food, medical care, shelter, warmth and clothing.
- **Physical abuse** may include hitting, shaking, throwing, poisoning, burning, drowning, suffocating, or otherwise causing physical harm including by fabricating the symptoms or, or deliberately causing, ill-health to another.
- **Psychological abuse** includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Safeguarding** means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.
- **Self-harm** refers to a wide range of behaviours that someone does to themselves in a deliberate and usually hidden way, resulting in non-fatal injury or in the case of suicide, death.

- **Sexual abuse** is forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening; this may involve physical contact, including penetrative or non-penetrative acts. This may include involving children and vulnerable adults in looking at, or the production of, pornographic material or encouraging children/vulnerable adults to behave in sexually inappropriate ways. It also includes situations where the individual does not have the capacity to consent or has been coerced because the other person is in a position of trust, power or authority.
- **Sexual exploitation** is a form of sexual abuse, where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or vulnerable adult into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. Sexual exploitation may occur even if the activity appears consensual, and it can occur through the use of technology.
- **Spiritual abuse:** Spiritual (or religious) abuse is a form of emotional and psychological abuse. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context which causes harm or injury to people.
- **Trafficking** is when people are illegally transported from one country or area to another, typically for the purposes of forced labour or commercial sexual exploitation.
- **Violent extremism** includes violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activities in the name of an ideology or set of beliefs.
- **Vulnerability** describes a situation when a child or adult is at risk of exploitation, harm or abuse. A person may join the University already vulnerable, or can become vulnerable because of specific circumstances, which may increase the risk of them experiencing harm or abuse.
- **Vulnerable adult** is term previously referred to in the context of safeguarding. Now, the term used is an '**adult at risk of harm or abuse**'. This still refers to a person aged 18 or over who is, or may be, in need of additional care services because of mental or other disability, age, personal circumstances or illness. An individual may be at risk of harm or abuse through being unable to take care of himself or herself, or unable to protect him or herself against significant harm or abuse.

Appendix 6: Students under the age of 18

a) Summary

This document outlines the approach of the University of Plymouth towards prospective and current students who are under the age of 18, both in terms of safeguarding this group and ensuring an enjoyable university experience, providing reassurance to the student themselves as well as their family and support network, be that locally or internationally.

Under the Children Act 1989, a child is defined as “a person under the age of 18”. Accordingly, any students yet to reach the age of 18 years are regarded as children, including within this policy.

b) Introduction

Most students will be aged 18 or over when they commence their studies, or they will turn 18 very soon after they start. This guidance outlines our approach to all applicants and students (including those holding Tier 4 visas and other international students) under the age of 18 and until their 18th birthday. It also applies to University of Plymouth International College (UPIC) students who study at the University of Plymouth.

c) Admissions

The University welcomes applications from candidates irrespective of age, including those who are under the age of 18. Applications are considered on their merits and we may offer a place to under 18 students if we believe the student has the potential, intellect and academic ability to successfully complete the relevant programme of study and have sufficient personal maturity to benefit from higher education. The only exception is where there are accreditation and legal age requirements which may preclude students under the age of 18, for instance on some health-related programmes.

Admission of International Students or those on Tier 4 Visas under the age of 18

Under Section 55 of the Borders, Citizenship and Immigration Act 2009, the Home Office must have regard to the need to safeguard children and protect their welfare. All children studying in the UK must have suitable care arrangements in place for their travel, reception on arrival in the UK and living arrangements while here. This applies up to a child's 18th birthday.

If upon the date the Confirmation of Acceptance for Study (CAS) is issued to a Tier 4 applicants, or upon the date a place is confirmed as unconditional or unconditional

firm for an international student, a student is under the age of 18, this procedure will be followed.

Upon application, the Admissions Team will advise the student of the information they are required to supply (see section 5), and will advise the student that this information is required at either a date prior to the CAS being issued, the date of the CAS being issued or on the date their unconditional offer is made, if they do not require a CAS. This document will be made available to this group of prospective students.

For Tier 4 applicants, when all academic conditions are met:

- The student or their agent/representative will be emailed the 'Under 18 Consent letter' which must be completed by the parent or legal guardian and signed and returned to the University
- The student is required to supply contact details (see Section 4)

Upon these requirements being met, and when all other conditions are satisfied, the CAS will be issued as per the usual procedures.

It is a condition of legislation that any 16 or 17 year old prospective students, applying as a Tier 4 (General) student, must have their parent(s) or legal guardian(s) consent that they can live and travel independently. The University therefore has to ensure this consent has been received, which happens through the 'Under 18 Consent Letter'. This letter must be retained by the University.

The University does not have a license to sponsor students under Tier 4 (Child).

For other international applicants, when all academic conditions are met:

Section 4 applies.

d) Online interactions

The following should be applied:

- Where possible online interactions should take place on a secure platform
- Social Media should not be used
- When using video platforms, always ask the student if they would prefer their camera to be off
- Aim to work in an open environment that does not intrude on the student's privacy. Where this is not possible then ensure that the student is in an environment where they feel comfortable

When working with under 18s in partner colleges or schools then the college or school must confirm that they have a safeguarding policy in place and have

protocols for online interaction. If in doubt please contact the central safeguarding team for advice safeguarding@plymouth.ac.uk

e) Parents and guardians

Prior to arrival at the university, any student under the age of 18 at their enrolment date must provide us with contact details for their:

- Parent, or
- Other legal guardian if both parents are deceased, overseas or otherwise unavailable. Such a guardian should:
 - Agree with the parents to act on their behalf and to perform the parental tasks and responsibilities delegated by them until the student's 18th birthday;
 - Ideally live near Plymouth/in the south west of England; and,
 - If necessary, be available to the student and University when required

We require a copy of the guardian's agreement with the parents, as part of any offer made to the student. A guardian is normally a friend of the family or relative living in the UK; we are unable to appoint, or assist in finding, a suitable guardian. A list of accredited agencies is available from the Association of Educational Guardians for International students (AEGIS) – www.aegisuk.net.

The majority of Tier 4 or other international students' parents or legal guardians will reside outside of the UK. In such cases, we require Tier 4 and other international students to obtain a UK-based legal guardian. Alternatively, they must provide upon application the contact details of their parent(s) or legal guardian(s) if they are ordinarily resident in the UK. No CAS will be issued without details of the student's guardian being confirmed.

Should a student need to change their guardian, this is acceptable provided there is no gap of time between guardians (there must be a guardian at all times as a condition of that student's enrolment until their 18th birthday; the absence of a named guardian could result in the termination of enrolment).

f) Students' general rights and responsibilities

A university represents an adult environment and treats all students as mature, independent individuals. In particular, we will normally deal and correspond with our students than with their parents.

Under the Data Protection Act 2018, students (including those under the age of 18) have the legal right for information about them not to be disclosed without their consent. Accordingly, unless this explicit consent is granted, we will not normally

give information to parents regarding any student's progress, results or personal circumstances. This applies to all students regardless of age.

Students are expected to seek support as they require it, and should do the following:

- Act as adults and behave in an appropriate manner
- Assume responsibility for their studies and lifestyle, including adapting to living away from home
- Engage with their personal tutor to maintain contact and allow the tutor to support them
- Have the right skills to study and live independently with diverse groups of people
- Comply with the laws of the UK, for instance the purchase, selling or use of alcohol or tobacco prior to age 18

Although we acknowledge that anyone under the age of 18 is legally a child, and may have additional needs for support and welfare, we will not take on the usual rights, responsibilities and authority that parents have in relation to a child and will not act in 'loco parentis'¹ in relation to students under age 18. We will not assume responsibility for any student's acts or omissions.

g) Privacy & how we use your information

We request and store details of parents/legal guardians for under 18 applicants in order to exercise our duty of care (and in the case of Tier 4 students this is a requirement of the visa). This information is stored on the relevant information systems (e.g. Salesforce, Unit-E) in accordance with legislative requirements including the Data Protection Act 2018.

We use the details of parents or legal guardians very rarely. It is our usual practice to correspond with students and not with parents or legal guardians and this approach will also apply to students who are under the age of 18 years. Although those under 18 are regarded as children under UK law, they still generally have the legal right under legislation for information about them not to be disclosed. This means that we will not usually give information to parents or legal guardians regarding the student's progress, results or any other personal circumstance unless the student has given specific consent or specific circumstances apply when we are obliged to contact their named parent/legal guardian.

¹ This is a legal term derived originally from English common law, it means "in the place of a parent"
University of Plymouth Safeguarding Policy – Version 2 – University Safety Committee approved July 2020

Wherever possible, the student's permission will be sought prior to us contacting their parent or legal guardian. If this is not possible, for instance because the student is incapable or unconscious, or if permission is denied or the law requires it, in very exceptional circumstances the University may contact the parent or legal guardian. This will normally be where there are serious concerns for the welfare of the individual student for example, becoming aware of the student being admitted to hospital, a serious illness (mental or physical), or when a student is 'missing'. Making a decision to contact a parent or legal guardian will only be made by a senior manager of the University, usually within Academic Registry and Student Services or the University Executive Leadership Group. See the Student Contract for more information.

For those students not studying on a Tier 4 visa, data around parents/legal guardians will be retained until the student's 18th birthday. Following that, the information will be removed from our records. In order to continue to exercise our duty of care, we ask for next of kin/emergency contact details for all students.

h) Student support and safeguarding

We want all students to have the best possible experience while studying at university. This is a hugely formative and exciting time for young people. For any students under the age of 18, we take steps to safeguard their health, safety and welfare.

This will normally include:

- The names of under 18 year old students will be communicated by Admissions to the relevant Faculty, Student Accommodation and Academic Registry
- Through notification to the Faculty, the personal tutor will be made aware of the name of their under 18 student(s) and will meet with them at regular intervals, agreed by the student and tutor, to discuss his or her studies
- A member of Student Services staff will meet with students under the age of 18 at regular intervals, agreed by the student and member of staff, to discuss his or her wellbeing and living arrangements

All staff must report any suspicious, concerns, allegations or risks of child abuse to a DSO, details of which are provided in the Safeguarding Policy Appendix 1.

Similarly, if a student under the age of 18 discloses harm or abuse to a member of staff, the member of staff must report this to a DSO in the central team. Allegations involving a student on placement or exchange should also be raised in the same way.

i) Accommodation

The University seeks to promote and safeguard the welfare of students who are under 18 whilst living in university-managed accommodation and this guidance applies to students aged under 18 who have a licence, or booking, for university-managed accommodation. The guidance ceases to apply to students once they reach their 18th birthday.

- The university does not assume parental responsibility for any student under the age of 18
- Students and their families or supporters should bear in mind that the university is an adult environment, within which students are expected to behave appropriately including having the necessary skills to study and live independently alongside people from a wide variety of backgrounds
- Places in university-managed accommodation are offered on the understanding that the student will be able to adapt to living away in the residence and to look after themselves in practical matters. We strongly recommend (and will normally facilitate) under 18 year olds book accommodation with the university, in en-suite, single-sex accommodation
- The Accommodation Services team will notify the building provider (UPP) or under 18 year old residents to ensure housekeeping and maintenance follow appropriate processes and that there is awareness of under 18 year olds in any emergency response
- Accommodation Services will provide a 1-1 induction in person or online, along with parents, guardians or supporters if requested, and will ensure under 18 year olds are aware of whom to contact in case of difficulties, including individual training on fire evacuation and other emergency procedures. A member of the team will arrange a termly meeting for as long as students remain under the age of 18, to check on general wellbeing (we expect students to attend this however they are able to decline if they prefer)
- Accommodation Services will promptly inform the student's parent (or other named responsible adult on the licence) if we become aware that the student is in serious rent or is in serious breach of the Tenancy Agreement, invoking the Disciplinary Procedure. In all cases, the team will encourage students to involve their parent or other named responsible adult where possible, but ultimately this is their choice.
- Students live in their accommodation independently and the university does not monitor how students spend their leisure time or cope with student life (including finance, budgeting, medical needs), but students are encouraged to talk to university staff if they are struggling, so that advice and support can be given

- Students entering into a licence agreement are expected to abide by the terms and conditions of the licence and live independently, taking responsibility for their living arrangements. In all cases we expect residents to provide the name and address of a parent or other responsible adult who will be Accommodation Services point of contact
- Any under 18 year olds choosing to live in privately-managed accommodation do so independently of the university, and the university is not responsible for the policies or practices of such providers, however through the good practice network, the university encourages purpose-built student accommodation (PBSA) providers to adopt a similar approach to under 18 year olds in their residence(s)

j) Placements, field trips and exchanges

As part of a programme of study, students may be required or offered the opportunity to attend field trips, placements, excursions or other off-site study activities. This is a usual part of university life and helps students build life skills, so we encourage every eligible student to take part.

We are not able to make special arrangements for students under the age of 18, in this regard, and unless otherwise specified the parents or guardians of such students are deemed to have consented to the student's participation in such activities on that basis.

If a student attends another institution or organisation they should comply with the local policies and procedures.

k) Disclosure and Barring Service (DBS)

We conduct DBS checks for staff who satisfy the relevant criteria, to ensure suitability for working with under 18 year olds and vulnerable groups. More information is available in the DBS Policy.

l) Emergencies

In an emergency, we may contact the parent or guardian of an under 18 student using the most recent contact details provided to it, the 'next of kin' or 'emergency contact', or we will provide that information to the relevant authority such as the police. Accordingly, it is important for the student to keep these details up to date.

In extreme cases (for instance where emergency medical treatment is required for the student), action may need to be taken in the best interests of the student before his or her parents or guardians can be contacted. In such cases, parents are deemed (by virtue of this policy) to permit a senior member of the university (acting

in accordance with medical advice, as appropriate) to do whatever is necessary in the student's best interests.

Students, their parents or guardians must keep us informed of any student's special needs or requirements, if applicable, by contacting the student hub, which in turn can enable support to be put into place for the student such as disability, learning support and wellbeing: <https://www.plymouth.ac.uk/student-life/services/student-services>

m) Contracts and holding office

Any person under the age of 18 is unable to enter into a legal contract. If a student under the age of 18 needs to enter into a contract with the university, for instance relating to tuition fees or accommodation, the student's parent or guardian is required to guarantee the student's obligations under that contract.

A failure by a student to pay any sums due under a contract may result in demand being made by the University on the parent or guardian. Any continuing failure to pay the University may result in studies being interrupted.

Under 18 year olds are encouraged to actively participate in clubs and societies organised by the University of Plymouth Students' Union, however they are unable to hold office until they reach age 18, as they will be unable before this age to discharge an office-holder's legal responsibilities.

Appendix 7: Safeguarding Working Group membershipFor any enquiries, email safeguarding@plymouth.ac.uk

Role on working group	Name and job title	Contact details
Chair	Alice Ludgate, <i>Head of Student Services</i>	Alice.ludgate@plymouth.ac.uk
Minutes and administration	Katie Barber, <i>Note taker and Administrator</i>	Katie.barber@plymouth.ac.uk
Group member	Anne Bentley, <i>Manager Student Wellbeing Services</i>	Anne.bentley@plymouth.ac.uk
Group member	Sarah Gibson, <i>Chief Executive, UPSU</i>	Sarah.Gibson@su.plymouth.ac.uk
Group member	Stephanie Burrell, <i>Library & Educational Development</i>	Stephanie.burrell@plymouth.ac.uk
Group member	Dave Fleming, <i>IT Portfolio Manager – Education & Student Experience Solution Delivery</i>	dfleming@plymouth.ac.uk
Group member	Heather Cotton, <i>Student Accommodation Manager</i>	Heather.cotton@plymouth.ac.uk
Group member	Rich Avery, <i>Events & Graduation Manager</i>	rjavery@plymouth@plymouth.ac.uk
Group member	Kirstie Spencer, <i>Human Resources</i>	Kirstie.spencer@plymouth.ac.uk
Group member	Miles Opie, <i>Associate Director Student Experience</i>	Miles.opie@plymouth.ac.uk
Group member	Pat Shepperd <i>Faculty Registrar, Faculty of Science and Engineering</i>	p.shepperd@plymouth.ac.uk
Group member	Sarah Kearns, <i>Research Development Manager</i>	Sarah.kearns@plymouth.ac.uk
Group member	Charles Thornton, <i>Lecturer in Service Operations, Plymouth Business School (Faculty of Arts and Humanities)</i>	Charles.thornton@plymouth.ac.uk
Group member	Jonathon Ross-McNairn, <i>Multi-Faith Pastoral and Spiritual Support Co-ordinator</i>	Jonathon.ross-mcnairn@plymouth.ac.uk
Group member	Julie Swain, <i>Partnership Manager, UK and International Partnerships</i>	Julie.swain@plymouth.ac.uk
Group member	Katie Rhodes, <i>Events Senior Administrator, Exams, Awards, Graduation and Events</i>	Katie.rhodes@plymouth.ac.uk
Group member	Kim Ward, <i>Lecturer in Human Geography, School of Geography, Earth and Environmental Sciences</i>	Kim.ward@plymouth.ac.uk
Group member	Laura Beahan, <i>Student Support and Conduct Manager</i>	Laura.beahan@plymouth.ac.uk
Group member	Mark Beresford, <i>Student</i>	Mark.beresford@plymouth.ac.uk

University of Plymouth Safeguarding Policy

	<i>Engagement and Careers Operations Manager</i>	
Group member	Neil Gillett, <i>Student Services Manager (Advice and Hub)</i>	Neil.gillett@plymouth.ac.uk
Group member	Drew Kearney, <i>Head of College and Academic Services (University of Plymouth International College)</i>	drew.kearney@upic.plymouth.ac.uk
Group member	Rachel Goodsell, <i>Faculty Business Manager</i>	Rachel.goodsell@plymouth.ac.uk
Group member	Robert Witton, <i>Director of Social Engagement and Community-based Dentistry (Education)</i>	Robert.witton@plymouth.ac.uk
Group member	Nick Toms, <i>Associate Professor in Clinical Education & Pharmacology (Education)</i>	Nick.toms@plymouth.ac.uk
Group member	Salam Katbi, <i>Regional Prevent Coordinator (Department for Education)</i>	Salam.katbi@education.gov.uk
Group member	Chukwudi Ezenyi, <i>President, Students' Union</i>	Chukwudi.ezenyi@su.plymouth.ac.uk
Group member	Nicole Woodhall, <i>Administrator in Timetabling</i>	Nicole.woodhall@plymouth.ac.uk
Group member	Lawrence Church, <i>Security Co-ordinator (Estates and Facilities)</i>	Lawrence.church@plymouth.ac.uk
Group member	Lisa Deblasio, <i>Lecturer in Law</i>	Lisa.deblasio@plymouth.ac.uk
Group member	Sadie Legh, <i>Apprentice Reviewer</i>	Sadie.legh@plymouth.ac.uk