The Institute of Ismaili Studies Policy Handbook		
Policy title	Safeguarding Policy (including the Prevent Duty)	
Application	All employees, students, governors, trustees, agency staff, consultants, visitors and volunteers	
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1. Introduction

This policy sets out the Institute's commitment, as well as its statutory duty, to safeguard and promote the safety and welfare of all of its employees, students, stakeholders and partners when they are working in the Aga Khan Centre (AKC) or elsewhere on behalf of the Institute.

This policy aims to help employees and students to feel confident about dealing with situations that may arise by outlining our safe recruitment process and our commitment to training; by describing the clear processes that should be followed when raising and dealing with concerns and by signposting individuals to internal or external contacts and sources of information to obtain help and advice.

This policy has been developed to ensure that the Institute complies with its statutory duty under the Higher Education Act 2004, the Safeguarding Vulnerable Groups Act 2006 and The Equality Act 2010. In addition, this policy implements the specific responsibilities of FE and HE providers as set out in the Counter-Terrorism and Security Act 2015, the Prevent Duty Guidance for Higher Education Institutions (2015) and the Office for Students' Framework for monitoring Prevent in Higher Education in England to ensure that safe recruitment and management practices are in place to safeguard our students from harm and the risk of radicalisation of any sort. The Office for Students also requires all registered HEIs to have the appropriate policy and procedures in place to ensure the safeguarding of students and staff and compliance with the Prevent Duty.

Above all, this policy supports the Institute's aim of developing a positive culture and environment where our students are supported to learn and succeed and where our employees are supported to thrive professionally.

2. Scope

This policy outlines our responsibility for the provision of a safe environment for all our staff, students, governors, trustees, agency staff, consultants, visitors and volunteers.

For the purposes of this policy, references to "adults at risk of harm" are those over 18 years old who may need or receive support services due to mental or physical disability, age or illness and who may be unable to take care of themselves or protect themselves from significant harm or exploitation.

This policy is part of a group of safeguarding policies and should, where appropriate, and depending on the issue, be read in conjunction with other related policies such as the Dignity at Work Policy, External Speakers and Events Policy, Health and Safety Policy, IT Systems and Social Networking Policy and Whistleblowing Policy.

3. Definitions

Abuse or exploitation can take many forms and may include one or more of the following:

- Discriminatory abuse: treating someone in a less favourable way and causing them harm due to their age, gender, sexuality, disability, ethnic origin or religion.
- Psychological abuse: causing someone mental and emotional distress by using threats, humiliation, control, intimidation, harassment, verbal abuse etc.
- Physical abuse: physical harm caused by hitting, pushing, kicking, depriving liberty etc.

- Emotional abuse: persistent, emotional maltreatment such as to cause severe and persistent adverse effects. This may include bullying, including cyber bullying, individual or group peer pressure, conveying to someone that they are worthless or inadequate or denying them opportunities to express their views.
- Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation or being coerced into adopting extreme views, be they political, religious, economic or environmental etc.
- Bullying and harassment: The Institute takes a zero tolerance approach to bullying in all its forms and has a separate policy, a Dignity at Work Policy, to cover this issue.

4. The Prevent Code

There are three elements to the safeguarding responsibilities set out in the Prevent Code:

Prevention

- To provide an environment in which young people and vulnerable adults feel safe, secure, valued and respected.
- To promote awareness that everyone is responsible for identifying and reporting any cases of concern.

Protection

- To implement a procedure to monitor and report on incidents and interventions.
- To develop appropriate and effective relationships with other agencies in safeguarding and Prevent activities.

Safe recruitment

- To ensure effective procedures for verifying the suitability of all academic, business support and agency staff.
- To refer cases to a relevant public body or the local authority where appropriate.

In addition, the Prevent Code highlights the responsibilities of educational institutions in combatting extremism, radicalisation and terrorism.

Extremism applies to political or religious views that can be manifested as racism, homophobia, extreme right or left wing ideology and any religious extremism. It may also refer to calls for the death of members of the British armed forces.

The Government definition of extremism in the context of Prevent is the 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.

Radicalisation is the act or process of making a person more favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Terrorism is a threat or physical act of violence for the purpose of advancing a political, religious, racial or ideological cause.

5. Safeguarding roles and responsibilities

The **Co-Director** holds the specific responsibility for ensuring there is a safe environment for all of our employees and students; that this policy is implemented; that serious cases and breaches of this policy are reported to the Co-Director, the Heads of Department and to the Board of Governors, and that lessons are learnt from serious case reviews.

A **Lead Prevent and Safeguarding Coordinator** will be appointed to act as the Co-Director's representative. Specifically, they will:

- chair the termly Safeguarding Committee;
- oversee the achievement of the Prevent and safeguarding risk assessment plans, ensuring that deadlines are met and remedial action is robustly implemented;
- ensure that the appropriate level of training is undertaken by students, employees and Safeguarding Officers and that an overall record is maintained and monitored;
- receive any concerns submitted, make an initial assessment and initiate the necessary action or referral;
- collate the records held by Safeguarding Officers to report termly on any student or staff related issues to the Safeguarding Committee. The data, along with recommendations and actions to be taken will be discussed annually at Board of Governors meetings and minuted;
- ensure changes in legislation and regulations relating to safeguarding, including Prevent, issues, are incorporated into policies and procedures across the Institute;
- keep abreast of good practice across education establishments and make recommendation of change and improvement to the safeguarding policies and practices adopted by the Institute.

Two **Safeguarding Officers** will be appointed, one to represent the interests of employees and other stakeholders and one to represent the interests of students. Their responsibilities will be to:

- maintain an overview of safeguarding practices across the Institute and undertake an audit on a termly basis in order to produce a report for the Lead Prevent and Safeguarding Coordinator on all safeguarding activity and concerns.
- ensure all employees and students are educated regarding safeguarding policy and practice and that they are equipped to identify and report any concerns they come across immediately, using the Safeguarding Concern Form.
- ensure all employees and students understand and have access to the Safeguarding Policy.
- maintain accurate and detailed written records of all cases, referrals and concerns and keep them secure.
- report to the Safeguarding Committee and update Heads of Department on any issues and on-going investigations as appropriate.
- ensure that employees and students are able to recognise and identify signs of abuse or any safeguarding concerns and be able to follow the procedures to raise concerns.
- provide advice, support and be a point of contact for safeguarding issues.
- ensure the Prevent Code for the Counter-Terrorism and Security Act 2015 is complied with.

• fulfill a wider role of Wellbeing Champion, ensuring that employees and students are supported and signposted to specialist services as appropriate.

In conjunction with HR and the QA&E Unit, the **Safeguarding Committee** will review the Safeguarding Policy on an annual basis and will ensure that any changes in legislation and good practice are incorporated into it. The membership of the Committee will include academic Heads of Department and the relevant Heads of Department representing the support services will be invited according to agenda items to be discussed. The Committee will also review the range of agencies used and the process for investigating and escalating issues to ensure efficiency and effectiveness.

IT Services are responsible for ensuring that the use of online communication channels, especially email and social media sites, as well as Internet-based learning resource platforms are monitored and are only used for educational purposes. Any concern that systems are being misused to promote radicalism or extremist points of view amongst the academic or student community will be investigated and disciplinary action will be taken if necessary.

Responsibility lies with **Human Resources** for authorising the issue of ID cards to all new employees and contractors working in the AKC. When an employee or contractor leaves the Institute, the card will be deactivated. Human Resources will also retain the overview of the training of staff, ensuring that the online training course is completed by new starters during the probation period and maintaining records to evidence that all current staff are trained and undertake any refresher training as appropriate. Human Resources will also oversee and audit safe recruitment practice and will ensure all recruiting managers receive the appropriate training.

The **Buildings Management Team** is responsible for ensuring the AKC is adequately equipped with security and reception staff, CCTV, alarm systems, building accessibility features and communication equipment. The use of such equipment should be fully compliant with GDPR requirements.

The security and reception staff are responsible for controlling access to the AKC by employees and students and will do this by issuing ID cards with the appropriate lanyard, issuing and checking visitor ID cards as required and ensuring that visitors are always accompanied from and to reception by a representative of the relevant department. They will respond promptly to security incidents, should they occur.

6. Safe recruitment

The Institute is committed to attracting the highest quality candidates who are also a good fit with the values and culture of the organisation. As part of its safe recruitment practices, Human Resources will include the following steps in its recruitment processes.

- Interview questions for all senior management positions will include a question to candidates about their attitude and commitment to safeguarding and the specific issues related to their function.
- Gaps in employment history, frequent changes in employment and reasons for leaving positions will be explored with candidates.
- Reference requests will specifically ask if the applicant has ever been subject to disciplinary proceedings involving unethical practice, bullying, harassment,

- discrimination or radicalisation, or if they have ever resigned while under investigation for such issues.
- Human Resources will carry out a passport check and a social media scan and will
 consult the World-Check database. All checks will be made before new employees
 start their employment.
- All new employees will be introduced to, and asked to sign up to, the Institute's core safeguarding policies and will be required to undertake online training on relevant topics during their probation period.

The recruitment of students will mirror these safe recruitment practices, to the extent appropriate, including the exploration of gaps in a student's education at interview, the robust handling of academic and personal reference requests and passport checks. The Prevent Code will also be part of our students' induction process in the autumn term.

7. Freedom of speech and academic freedom

As an HEI, the Institute has a mandate to advance knowledge and promote academic freedom amongst its scholars, as these principles are fundamental to the Institute's mission, teaching and research. However, it needs to balance this with its duty to challenge extremist social, political or religious views and ideologies, prevent people from being drawn into terrorism and protect student and staff welfare.

In its management of events which are hosted on IIS premises or at an external venue in the name of the IIS, and in its choice of external speakers and lecturers, the relevant event organiser will risk assess the themes to be discussed before any event or specific speakers are confirmed; will mitigate the risk, if appropriate, by imposing conditions on how the event is run or by inviting other speakers to provide balance and opposing viewpoints; or they may decide that adjudication or facilitation from a senior manager within the Institute should be provided as a safeguarding measure.

This policy should be read in conjunction with the Institute's policy statements on Freedom of Speech and Academic Freedom.

8. Monitoring the use of IT and social media

The Institute accepts that the use of the Internet and social media is a fundamental part of most people's lives. Cyber bullying, harassment, discrimination or victimisation will not be tolerated and will be treated in exactly the same way as other forms of malicious and unwanted behaviour.

Staff and student computers will have the appropriate filters to limit the risk of access to inappropriate sites and content on Institute computers and phones and any breaches may lead to disciplinary action.

9. Procedure for raising concerns

When an incident or a concern is identified, the employee or student wishing to escalate the matter will complete and submit a Safeguarding Concern Form (will be attached at Appendix 1) to the relevant Safeguarding Officer.

The Safeguarding Officer will record the concern and will assess the matter before deciding whether further action or escalation to the Lead Prevent and Safeguarding Coordinator is necessary. The outcome may be the instigation of an HR process under one of the safeguarding or other organisational policies, such as the Disciplinary Policy, or it may be further training or a referral to the local authority or an external agency, if the matter is deemed to be serious.

If the concern relates to a student, the Safeguarding Officer should instigate and investigation, working in conjunction with the Department of Graduate Studies.

A list of the key internal contacts and external agencies to be used for the escalation of safeguarding concerns is attached at Appendix 2.

Appendix 2

Role / Agency	Reason for escalation	Contact details	
Internal lead roles			
Lead Prevent and Safeguarding Coordinator	Concern is serious and mitigating action is needed. The concern may be a breach of policy or practice and may affect a number of employees / students.	Head of Quality Assurance - TBA	
Safeguarding Officer – staff and stakeholders	First point of contact for raising general concerns about self and others.	Editorial Project Coordinator (DARP) - Wendy Robinson (TBA) wrobinson@iis.ac.uk	
Safeguarding Officer - students	First point of contact for raising general concerns about self and others.	Assistant Manager, Student Services (DGS) - Rakeeza Kanth rkanth@iis.ac.uk	
Manager of Victoria Hall	Where the concern specifically relates to behaviours / incidents witnessed in the student accommodation.	Katie Jeavons katie.jeavons@host-students.com	
External agencies			
Camden Council Prevent Coordinator	Any serious breach of the Prevent Duty.	Albert Simango albert.simango@camden.gov.uk	
Office for Students	Any serious breach of the Prevent Duty.	Tom Adams tom.adams@officeforstudents.org.uk	
DfE Regional Prevent Coordinators	For training, advice and more regional information about issues and trends.	Jake Butterworth jake.butterworth@education.gov.uk	
Police	Organisations need to report any individuals who have been involved in criminal activity to the Police.		
UKVI	Part of the Home Office, UKVI is responsible for making decisions about who has the right to visit or stay (work or study) in the country.		