

4. Safeguarding Policy

ACKNOWLEDGEMENT:

CNELM would like to acknowledge the contributions of CNELM's Student Representatives in the discussion and creation of this Policy. In addition, CNELM reviewed the Safeguarding Policies and other relevant documents of a number of other UK Higher Education establishments as follows: Middlesex University, King's College London, Hull University, Durham University and the University of Cambridge. CNELM would like to acknowledge the contribution of these policy documents from other establishments in the creation of this Policy. The University of Cambridge safeguarding policy was instrumental in the approach taken.

PURPOSE:

The purpose of this document is to set out the Policy position of CNELM and associated procedures in relation to Safeguarding.

This document sets out:

- the CNELM approach to safeguarding;
- the responsibilities of its members, students and staff, in relation to safeguarding and the channels by which to report concerns;
- what members can expect from CNELM in response to raising concerns; and
- signposting to relevant CNELM policies and procedures.

SCOPE:

This Policy relates to all users and Stakeholders at CNELM that are part of our Online Community.

Contextual Background: CNELM is now a fully Online Community. The undergraduate and postgraduate degree programmes are validated by Middlesex University for Distance Learning and the Clinical and Coaching Programmes are now fully online.

Our Online Programmes are delivered via Moodle Virtual Learning Environment (VLC), Video Conferencing software (Zoom, Google Meet and Microsoft Teams), Communication Software (Education G Suite Gmail, Chat and shared documents via Google Drive), Telecommunications software (Zoom Phones) and an Online Academic System (OAS).

Since the outset of the Covid-19 pandemic, all elements of CNELM's Personalised Nutrition Practice Diploma (PNPD) course and other clinical and coaching programmes have been accessible online. Similarly, most staff have worked remotely.

CNELM is working towards becoming a 'Virtual Business and HE provider' in the foreseeable future and would no longer have a physical site. Should attendance opportunities including meetings, coaching courses, extracurricular events take place in the future, CNELM would hire an appropriate venue and would provide additional health and safety guidance as relevant to the event.

CNELM will offer occasional meetings and events staff and/or students can attend and, when these are offered, CNELM will provide specific additional health and safety guidance for delegates.

Therefore, the main focus for our Safeguarding policy is related to an online virtual college experience.

STATEMENT:

CNELM aims, in all of its decisions, to create a safe and vibrant student experience that is diverse and academically robust.

Safeguarding the student experience is paramount as well as safeguarding all people in the context of preventing a risk of radicalisation and/or indoctrination.

Tackling controversial subjects or where views expressed are at the extreme end of a continuum of beliefs, opinions, research, scientific endeavour, popular culture or when challenging current paradigms, CNELM aims for students and staff to have the opportunity to engage professionally and with courtesy to the views of others.

CNELM is committed to safeguarding the welfare of all members of its community, students, and staff. It is also mindful of the particular safeguarding duties owed to specific vulnerable groups. In all its activities, CNELM aspires to promote the safety and wellbeing of all members of its community.

Safeguarding at its core is about protecting normal developmental pathways within Higher Education: the creation of a safe environment to learn, explore, experiment, make mistakes and be creative. It is also about the promotion of respect for each other and our diversity. Critical to a safeguarding agenda is the notion of academic fairness in that all students have a fair opportunity to perform and achieve in the assessments and to engage and progress in their studies, regardless of where an individual is located geographically within a global student and staff community. To protect the student experience is a fundamental aim. Naturally part of this endeavour is to protect members of our community from harm.

The term 'safeguarding' has traditionally been used to describe the legal duty to protect from harm Children (any person under the age of 18) and Adults At Risk (an adult who is or who may be unable to take care of themselves or protect themselves against serious harm). However, over the last few years, the term 'safeguarding' has increasingly been used to describe 'wider ethical or pastoral responsibilities where it may be possible to safeguard the welfare of children and adults'. This wider meaning of the term 'safeguarding' is used within this document as it is consistent with CNELM's aim to promote the safety and wellbeing of all members of its community.

Within CNELM, 'safeguarding' applies in any situation where any member of our community may be at risk of physical, mental or emotional harm, whether as a result of particular vulnerabilities, their circumstances or the behaviour of another person. CNELM's safeguarding duties, and the policies and procedures that cover these duties, can be grouped under the following categories:

- **legal safeguarding duties** (relating to Children and Adults At Risk);
- **specific safeguarding-related responsibilities** (for example: complying with the [Prevent](#) duty; operating whistleblowing policies for staff; taking immediate action where serious harm or risk of serious harm has been reported; and carrying out Disclosure and Barring Service checks as necessary); and
- **a general duty of care** (for example: in relation to health and safety and lone working).

The above points are provided as Annexes at the end of this document and are designed so that students and staff can refer directly to the applicable Annex as related to their needs. Students and staff can also copy the applicable Annex as a standalone document for easy reference.

CNELM APPROACH:

Risk assessment, risk management and safeguarding processes are a critical part of CNELM's governance structure, managed through delegated responsibility to nominated staff with appropriate experience and seniority. In this way, CNELM's decision-makers, BEEC (Business & Education Ethics Committee), External Partners and other stakeholders can assure themselves that CNELM is taking appropriate steps to minimise risk of harm and to safeguard all members of its community.

All members of the CNELM staff and student community are adults and, therefore, CNELM expects and enables them to act appropriately and take responsibility for their actions, within the confines of CNELM's policies and procedures. For example, staff in contact with Children or Adults at Risk are expected to have read and comprehend the Safeguarding Policy.

Proportionality and the rights and freedoms of individuals: While complying with its legal responsibilities and acknowledging that the welfare of the members of its community is paramount, CNELM will endeavour to ensure that any action taken in connection with safeguarding is proportionate. Preventative and responsive action will be based on CNELM assessing the level of risk of harm, which may draw on internal and external information and advice, to members in a particular set of circumstances.

In some instances, it may be necessary to take urgent action which involves curtailing the rights of members of its community in order to safeguard those members themselves or other individuals. It will usually only be appropriate to take such action if there is an immediate and significant risk of harm to one or more members of the community. This threshold is set purposefully high to protect the rights and freedoms of individuals within the community.

Types of safeguarding actions which may restrict the rights and freedoms of individuals may involve temporarily restricting access to CNELM facilities (physical or virtual), premises or services; or, where other action will not sufficiently mitigate the risk, temporarily suspending a student or member of staff.

Sources of safeguarding disclosures: CNELM may take action upon the receipt of information from a variety of sources, including:

- from a person who is themselves at risk of harm or neglect, for example, the person may report concerns to CNELM because they are worried about themselves, or their circumstances;
- from a member of the CNELM community who is concerned about another member of the community. This source may include CNELM's support professionals or Coach Mentor, Module Leaders or Clinic Supervisors where there are concerns that an individual:

- a) has needs for care and support;
- b) is experiencing, or at risk of, neglect or physical, mental or emotional harm; and
- c) as a result of those needs are unable to protect themselves against the neglect of harm or the risk of it by themselves or others.

Support services will explain the limits of confidentiality to students in this regard at the beginning of their engagement with the service. Likewise limits of confidentiality are set out in the Client Terms of Agreement for volunteer clients engaging in the CNELM Nutritional Therapy Training Clinic:

- from someone who reports being harmed by a member of the CNELM community;
- from someone who has made or is aware of allegations against a member of the CNELM community, which may result in potential risk to other members of the community;
- from specialist external agencies, such as the Home Office or Local Authority.

In every situation, although the individual decision-makers may vary, CNELM will use transparent, consistent and lawful principles in deciding on what action to take within appropriate timeframes.

Principles for making safeguarding decisions: There are sometimes competing risks and conflicting information when considering if the threshold for taking action has been met and, if so, what action is proportional. These decisions may also need to be taken very quickly and therefore the information available to CNELM may change and lead to a decision being revised. However, in every case and within these limitations, these principles will apply:

- CNELM will promote and prioritise the safety and wellbeing of Children and Adults At Risk;
- CNELM will consider all reports or disclosures made in good faith;
- CNELM will use all information it is aware of that is relevant to the circumstances when making a decision, and will take into account the nature of that information, how it was collected and any legal restrictions on its use;
- CNELM will consider the appropriate weight of different types of evidence. For example, medical evidence from a medically qualified professional or the account of a witness is likely to hold more weight than someone reporting something of which they do not have first-hand knowledge;
- CNELM will liaise with internal specialists or external partners where lawful, possible and beneficial;
- CNELM will appoint appropriate decision-makers and safeguarding leads who will be appropriately informed and supported, who are not conflicted as a result of personal knowledge of the student or staff involved. If this is not possible, CNELM will arrange for independent oversight which may include the Business and Education Ethics Committee (BEEC) or External Academic Quality Reviewer (EAQR).
- CNELM will consider the risk of harm to the person who is the subject of any concerns, and the person reporting any concerns, as well as to other members of the community;
- CNELM will consider the likelihood and the impact of any risks;
- Where CNELM considers that the threshold for taking action is met, CNELM will seek to ensure that any action taken is reasonable and proportionate;
- Once a decision has been made that action is required, the action will be put in place as soon as possible;
- Information about the decision-making process and the decision will be shared only on a need-to-know basis and in accordance with relevant laws and standards;
- Any action taken will be reviewed as the circumstances or information change, in line with the relevant policy and/or procedure.

Communicating safeguarding decisions: The duties around safeguarding may often involve managing the potential ongoing and changing risk that a person may pose to themselves or others. Communication is part of this management process.

Actions that are taken in relation to safeguarding can be shared only on a need-to-know basis. It is important that the risk of harm to the person themselves or others is not increased by widely sharing information about the matter and that CNELM complies with Data Protection Law and other laws governing information sharing. People who potentially pose a risk of harm to others may themselves be vulnerable or have poor mental health. There may also be other people involved and sharing further information may pose additional risks to these people. CNELM has a duty to minimise the risk of harm to all those involved.

However, CNELM recognises that decisions as to what information is shared and with whom are context-specific, and that there may be circumstances when it is necessary to share, or not to share, information. For example, there are strict rules regarding sharing medical, counselling or disciplinary information.

Informing CNELM of concerns: Members of the community should report serious concerns to CNELM either about themselves or about others, or regarding CNELM's online environment. Although in an emergency, emergency services should be contacted in the first instance. Protective measures are in place to ensure that someone is not disadvantaged for raising a genuinely-held concern.

Students and staff are encouraged to report risks and concerns as they arise using appropriate channels, so that any risks can be effectively mitigated. However, there is no formal deadline for reporting, as CNELM understands that the impact of some incidents (for example, being subjected to sexual violence or racial discrimination) can result in delays to

reporting. A significant delay in reporting may impact the level of investigation that can take place, or the range of possible outcomes that may result from the investigation (for example if the student or staff member is no longer a member of CNELM). However, every case is different and, therefore, it is better to report it through the appropriate channel so that the matter can be recorded and the person reporting can be advised on the possible next steps.

The appropriate channels for reporting concerns relating to CNELM matters are as follows:

ITEM REPORTED	WHO IS REPORTING	ABOUT	REPORT TO
Any Matter related to Children or Adults at Risk.	Students Staff	Children or Adults at Risk.	Head of Quality Assurance (HQA) (who will inform the Chair of the BEEC)
Physical, sexual or abusive harm of another member of the community, including on the basis of protected characteristics (in person or online)	Staff Student	A Student A Staff member	Line Manager or HQA Academic & Clinical Teams Director and/or HQA
	Student Staff	Another Student About another Staff member	Programme Manager/Leader HQA and/or Centre Administrator
Concerns relating to Prevent	Student or Staff	Student or Staff	Centre Administrator and/or HQA
I am currently not fit to work or study	Student Staff	Myself Myself	Programme Manager/Leader Line Manager, Centre Administrator and/or HQA
Someone else who may not be fit to work or study	Student or Staff	Student	Programme Manager/Leader
	Student	Staff	HQA or Academic & Clinical Teams Director
A criminal investigation or conviction or another serious matter	Student	Student (including myself)	HQA
	Staff	Student	HQA
	Student	Staff	HQA
	Staff	Staff (including myself)	HQA or where relevant using whistleblowing to preserve anonymity

Reporting concerns outside CNELM:

Criminal proceedings: There may be some circumstances where those involved choose to report a matter to the police instead of, or as well as, to CNELM. All students, staff and visitors are free to report matters to the police where they believe a crime has been, or may have been, committed.

If something is being investigated by the police then CNELM will not interfere with that investigation (and may be obliged to cooperate with it) and will usually wait until the investigation and any resulting proceedings are complete before taking its own action. However, where the allegation is serious, CNELM may take interim action to protect the CNELM community, for example by removing or limiting the person's access to CNELM's online educational services and access where technically possible to the online community. Nevertheless, an integral part of the criminal justice process is that a person is 'innocent until proven guilty'. Calculating potential risk to the community is different to making a judgement on whether the person has broken the law; the former is concerned only with whether it is necessary to mitigate any risks arising from the fact that the person may have broken the law.

If a student or staff has been charged with a relevant criminal offence (including any sexual offence or any offence which may prevent them lawfully from having certain types of contact with Children or Vulnerable Adults), there is a requirement that this is disclosed to CNELM by the student or staff themselves using the framework outlined in the table above, so that a risk assessment can be undertaken.

Any criminal investigations or proceedings are made using a ‘beyond reasonable doubt’ standard of proof. CNELM applies a different standard of proof - ‘balance of probabilities’ in its procedures – that is, based on the evidence, what is more likely than not to have happened. CNELM’s rules are also different from criminal law. These different rules and standards of proof mean that, even if the police decide not to investigate or charge, or if a court finds someone ‘not guilty’ of an offence, it may still be appropriate for CNELM to take action using its own regulations and procedures.

Other external investigations: Sometimes, other agencies or organisations have an interest in investigating a matter. This can include following a CNELM investigation. The person who has been the subject of an investigation will normally (and as required by law and CNELM procedure) be informed about any other organisation with whom CNELM will share details of the investigation or outcome. Others involved in the matter, who are not the person who has been the subject of the investigation, will not necessarily be informed of which external organisations will receive any details of the matter. However, CNELM will always follow its duties to report.

External organisations who may receive information during or following CNELM investigations may include: Middlesex University, Qualification accrediting bodies (e.g. NTEC, FHT), Qualification endorsement Body (e.g. Qualifi), professional bodies (e.g. BANT), Regulatory Bodies (e.g. CNHC), Middlesex University Prevent Lead and/or Local Authority Prevent Board, the Disclosure and Barring Service, employers of the person, third parties funding tuition fees, and other organisations who may need to know.

ANNEXES:

This Policy is inclusive of the following Annexes:

ANNEXE 1: LEGAL SAFEGUARDING DUTIES

ANNEXE 2: SPECIFIC SAFEGUARDING RELATED RESPONSIBILITIES (inclusive of Prevent Duty and Whistleblowing)

ANNEXE 3: A GENERAL DUTY OF CARE (inclusive of Health and Safety)

ANNEXE 4: CYBERSERSECURITY

ANNEXE 5: LONE WORKING

ANNEXE 6: RISK ASSESSMENT MATRIX

Named Contact Person/s responsible for this Policy

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Student Representatives are integral to the development and ongoing review of this policy.

This policy links to the following key CNELM policies and related documents:

- Managing Concerns Overarching Statement
- Equal Opportunities, Diversity & Inclusivity Statement
- CNELM Etiquette Policy
- Fitness to Study & Fitness to Practise Policy
- Exenuating Circumstances Policy
- Online Work Experience Policy
- Student Support Policy - including Learning Need Assessments and Support Plans
- Business & Education Ethics Committee (BEEC)
- Communication Policy
- IT Facilities and Web-services Acceptable Use Policy
- Middlesex University Regulations
- Confirmation Agreement and other Interview document
- Staff Handbook
- Student Representatives Guide
- CNELM Student Rep Terms of Agreement
- Data Protection and Retention Policies
- Privacy Statement
- Management of Client Documents Policy - CNELM Student Training Clinic

ANNEXE 1: LEGAL SAFEGUARDING DUTIES:

Protection of Vulnerable Children (PoVC):-

CNELM is an Alternative Higher Education provider, based in the UK. CNELM ordinarily does not employ staff or enrol students under the age of 18 years.

Children and young people may engage within CNELM via the Nutritional Therapy Training Clinic and, in such cases they must be accompanied by a 'Responsible Adult' as defined in the Children's Act 1989. Clinic Supervisors have up to date DBS (UK Government Disclosure & Barring Service) checks and remotely supervise Client Consultations. Since 2020 all Client Consultations have been conducted online using Zoom Video Conferencing Software. Consultations are made up of a first and return consultation and a short check-in call between the visits totalling about 5 hours. Therefore, within CNELM, the eligibility criteria outlined by the DBS of 'prolonged/substantial' and 'unsupervised' (meaning alone) contact with children does not apply for Client Consultation activity. More detailed information is contained in the Clinic and Coaching Handbook and the Client Terms of Agreement. In addition, each Consultation arrangement must be Quality Assured approved, and where applicable, a 5-step Risk Assessment undertaken based on the Risk Assessment Matrix. The Quality Assurance activity includes the student completing a 5-Step Risk Assessment Form outlining the arrangements of the consultation including confirmation that the proposed Client meets the eligibility criteria to be seen within the Nutritional Therapy Training Clinic as related to the Clients reported and presenting conditions. If the Client is accepted into the Clinic then they will be matched to the most suitable Clinic Supervisor. The Client is formally and legally a client of the Clinic Supervisor. The Clinic Manager conducts the initial Quality Assurance check and this is then signed-off by either the Head of QA, the Practice Supervisor or the Academic & Clinical Teams Director. Please also refer to the Risk Assessment Matrix outlined in ANNEXE 6. A 5-step Risk Assessment is completed by the student as part of the documents submitted for Quality Assurance including an assessment of the nature of the arrangements - i.e., Online video conferencing. When a consultation is face-to-face between the Student and Client then the risk assessment includes a 'clinic audit' of the physical premises where the consultation is to be conducted to ensure the venue meets the standards outlined by the Professional Body BANT (British Association For Nutrition And Lifestyle Medicine) including health and safety, fire safety, accessibility, washroom facilities, lone working and insurance.

CNELM provides all of its Taught Programmes as Distance Learning via its online Virtual Learning Environment, including live and recorded lecture content, tutorials and seminars. The student body is mainly made up of mature students - many of whom have children. We ask staff and students that children are not in the background and identifiable if attending live online sessions and not to take screenshots of the video conferencing stream - where possible staff and students attending live Zoom sessions should be in a private space and either use a virtual background or blurred background. Staff and students should exercise due diligence in relation to sharing personal identifying information when using CNELM online platforms and social media about themselves or of their children.

Protection of Vulnerable Adults (PoVA):-

Adults can be considered vulnerable by virtue of their circumstances. Vulnerabilities can relate to the Protected Characteristics as outlined in the Equality Act 2010.

Circumstances can relate to a person's physical and mental health and wellbeing. Health conditions can be permanent and progressive, episodic or transitory.

Most of the safeguarding considerations in relation to Vulnerable Adults are outlined in the following policies and statements:

Managing Concerns Overarching Statement
Equal Opportunities, Diversity & Inclusivity Statement
CNELM Etiquette Policy (Conduct)
Fitness to Study & Fitness to Practise Policy
Exenuating Circumstances Policy
Lone Working - Annexe of this Policy
Online Work Experience Policy
Student Support Policy - including Learning Need Assessments and Support Plans

The above Policies and Statements cover issues in relation to staying safe online, bullying, harassment, discrimination and freedom from harm.

In addition, our Data Protection and Data Retention Policies address issues related to the safeguarding of Personal and Special Category Information of our students and staff.

The above Policies and Statements also sign-post students and staff to the appropriate technical, administrative and support services and how to report concerns.

If you are concerned about the wellbeing of either yourself or others then please alert the most appropriate person to share your concerns using the table above - this is especially important if the concern is life-threatening either because of self-harm, including suicidal thoughts or expression of harm to others.

CNELM is committed to providing a safe space and place to work and learn. Wellbeing is a critical aspect of enjoying and meeting the challenge and satisfaction of study for students. CNELM understands that for mature students, finding the balance between work, family responsibilities and study can be challenging and can lead to stress and anxiety. CNELM has a comprehensive provision via our Extenuating Circumstances Policy, Interruption of Study provision and Study Plan

Reviews to help students manage stress points. In addition, CNELM's Student Support Manager and Coach Mentoring services are easily accessible. CNELM also provides regular online relaxation sessions.

A 5-step Risk Assessment is completed by the student as part of the documents submitted for Quality Assurance including an assessment of the nature of the arrangements in exactly the same way as outlined in the above section related to PoVC.

ANNEXE 2: SPECIFIC SAFEGUARDING RELATED RESPONSIBILITIES:

Prevent Duty: The Counter Terrorism and Security Act 2015 outlined the principles of the Prevent Duty i.e. to demonstrate '**due regard to the need to prevent people from being radicalised and drawn into terrorism**'.

CNELM, as an Alternative Higher Education provider that does not offer 'designated' taught Degree Programmes eligible for student loans via Student Finance England is consequently not required to register with the Office for Students (OfS). As a result, CNELM is not obligated under the Act to partake in the Prevent Monitoring and Reporting scheme undertaken by the OfS. CNELM, however, is still obliged to demonstrate the '**due regard**' under the Act as part of our Partnership with Middlesex University and consequently will report and/or refer Prevent cases to the University.

In relation to Prevent, CNELM has taken the following position and guiding principles:-

1. CNELM is an educational establishment that focuses on the activities of providing nutrition and lifestyle education, and nutritional therapy practice. Fundamental to this focus across the degree programmes and the Personalised Nutrition Practice Diploma course is the ability for students to develop and demonstrate robust critical thinking skills. This process starts early in student studies with a dedicated module called 'Thinking Critically' which is a Level 4 module for undergraduate students, and made available at the outset to postgraduate students as a refresher. Research Mindedness, Critical Evaluation and Personal Reflection are key components of the validated degree programmes and the CNELM Personalised Nutrition Practice Diploma programmes we teach.
2. The field of nutrition and lifestyle is broad, complex, often conflicting, and with substantial contradictory data. Within this field, there is strong opinion and ideas in relation to health, animal rights, farming methods, agricultural policy, food politics, specific dietary approaches, the 'food industry' and environmental protection. CNELM supports only the use of democratic and legal processes that bring about change which can include activism and legal rights to protest and lobby.
3. The majority of Speakers on the Degree Programmes and the CNELM PNPD are PAYE and Flexible Fee Contract Staff. Contributing and Guest Lecturers on these programmes are mostly well-known to CNELM and have contributed over many years. New Contributing or Guest lecturers are usually identified via 'word-of-mouth' as reputable speakers recommended by the wider nutrition and lifestyle industry. Speakers advocating personal beliefs in the above context are overall assessed as a low risk.
4. Existing guest speakers and contributing lecturers will be deemed compliant with this policy. New Contributing Lecturers will be provided with a Terms of Agreement and a copy of this Policy. The Terms of Agreement specifically requires the Contributing Lecturer to abide by this Policy.
5. CNELM will only support advocates who exclusively promote the use of democratic processes, including peaceful protest, to both raise public awareness and bring about change.
6. Our focus is the activity of education and the encouragement of our students to critically enquire, reflect, research and discover – including into areas where there is either controversy, little public consensus or evidence. Where a lecture, event or presentation includes areas of controversy, or where there are known strong, diverse and potentially extreme opinions as detailed in point 2 above, then CNELM will ensure by way of mitigation that a counter-opinion/voice is also heard, either at the Event in case of a Conference or Extracurricular Event, or across the curriculum in the context of the module and programme delivery.

Guiding Principles:-

1. CNELM recognises that no Institution is without risk and, with this in mind, CNELM will employ a risk assessment based approach to determining the approval of Events and Speakers.
2. Risk Assessments will be conducted using the Matrix of Risk and Consequence – see Appendix 1. The Risk Assessment will further consider any management plan and/or mitigating condition that reduces risk and/or consequence for an Event or Speaker to be approved.
3. Risk Assessments will consider a number of factors including but not limited to: the Topic, Logistics, Health and Safety. In addition, the assessment will consider issues related to Equality, Academic Freedom and Freedom of Speech.
4. **Right to Refuse** - As a Private Provider, CNELM Management reserves the right to refuse, without giving any reason, the use of web services for any Event if not in keeping with this policy, if not in keeping with our stated Mission, if impractical, inconvenient, potentially damaging to our reputation or prohibitive financially.
5. In relation to the degree programmes we teach, and other accredited programmes, the principle of **Academic Freedom** will be a fundamental guide. Academic Freedom, as expressed in the Education Reform Act 1988 (section 202), states: 'to **ensure** that academics have freedom **within the law** to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions'. CNELM considers this protection

to be fundamental to the advancement of the evidence base, research and academic rigour of our programmes, and relates to our stated mission as an institution in respect of nutrition, health and lifestyle. In this regard, it is important that 'received wisdom' can be tested and new ideas put forward within a complex, ever-changing, and competitive research and business environment.

6. **Freedom of speech** is another essential guiding principle. CNELM considers the protection of free exchange of ideas enhances the quality and rigour of debate, as stated in the Education Act 1986 (No 2 Section 43) CNELM commits to; 'take reasonably practical steps to ensure that the freedom of speech **within the law** is secured for staff, students and visitors'.
7. The Equality Act 2010 also has a bearing as a guiding principle due to the notion of a 'protected characteristic'. One of the protected characteristics is religion and belief. Other characteristics include race, gender, disability, age, sexual orientation, transgender status, marriage, and civil partnership, as well as maternity/pregnancy. Therefore, CNELM will seek to ensure that a platform is not denied in a way that would directly or indirectly discriminate, nor would CNELM allow a platform for the expression of views and opinions in a way that may harass, victimise or undermine the fostering of good relations between people who share a protected characteristic, and those who do not.
8. CNELM will adopt a **no platform** approach or Speakers using our facilities to express or promote **extreme** ideological, religious or political views that amounts to 'hate speech' (incitement of Hatred), especially where there is evidence of a past criminal conviction related to the Speaker/s. CNELM will not permit the use of its facilities to any group, or organisation proscribed by HM Government..
9. Within our own democracy, Freedom of Speech is seen as a right that comes with **responsibility** – that responsibility includes respect for the law and, as such, CNELM will not condone an abuse of such freedom that leads to, or potentially can lead to, **harm** to other people. Therefore, a **no harm principle** is an important codicil to any judgement/decision in respect of permitting Events to go ahead, or for particular Speakers to be given a platform.

CNELM adopts a process of application, background checks and risk assessment when approving Contributing Lecturers or use of CNELM facilities in relation to Events. Applications are sent to the Centre Administrator and processed in accordance with the above Guiding Principles and Position Statements. The approval is signed off by the Head of QA and/or Senior Management Team.

Whistleblowing Policies for Staff:-

CNELM has a Whistleblowing Policy for staff that is part of the Staff Handbook.

Disclosure and Barring Service:-

CNELM does not process DBS checks, though we retain the ability to do so. This is due to the fact that our activities do not fall within the criteria to lawfully process checks as the criteria of 'prolonged/substantial and unsupervised' contact with vulnerable persons is not met for the specific field of activity.

We do, however, require Clinic Supervisors to hold a current and up-to-date DBS.

ANNEXE 3: A GENERAL DUTY OF CARE:

Health and Safety - Working and Studying Online:

Please note that the primary responsibility for your health and safety is you. CNELM will provide guidance in relation to staying safe in an online learning environment and will sign post to good practice and guidance provided by the [Health and Safety Executive](#) via their website and online resources.

The Health and Safety Executive (HSE) recommends that those studying or working for long periods on computer screens should adopt the following positive behaviours:

- Breaking up long spells of computer work with rest breaks (at least 5 minutes every hour) or changes in activity.
- Avoiding awkward, static postures by regularly changing position.
- getting up and moving or doing stretching exercises avoiding eye fatigue by changing focus or blinking from time to time.
- Working in a well-lit room - especially in regard to the display screen equipment (DSE).
- Consider the use of blue screen glasses, especially if working in the evening.
- Use a comfortable and ergonomic seat and seating position right for you.
- Use wrist support to help prevent repetitive stress syndrome to wrist, hand, arm elbow, shoulder etc.
- Checking computer cables visually for damage, overheating and tripping hazards - CNELM recommends staff and students purchase a fire extinguisher suitable for electrical equipment
- If you feel unwell or are unfit to work or study - let people know.
- If you have an accident or injury - let someone know. If the accident or injury is study-related, please inform the Centre Administrator.

- If you are on medication and prone to a medical incident - such as fainting, epilepsy - and likely to attend live webinars and lectures then it is important a plan is in place via a Learning Needs Assessment so we can agree proactively how best to manage an incident in accordance with your wishes - including access to emergency contact numbers. Be proactive.

Staying Safe Online:-

- When using cameras, the background should be blurred or a template should be used. Be mindful of your surroundings and use an appropriate room for video calling. Preferably this would be a communal living space or a designated workspace and not a bedroom. Video calls should not be carried out from a bedroom unless the background is concealed.
- When on a video call you must wear suitable clothing, as should anyone else in the household whilst the call is taking place.
- Language must always be professional and appropriate, including other members of your household that may pass in the background.
- If a video call is to be recorded, all participants must be notified at the start of the session.
- Photographs or screenshots of a video call must only be taken with verbal consent.
- If screens are shared at any point, the individual must ensure that all extraneous tabs or browsers have been shut down.
- CNELM is committed to protecting the dignity of its students in their learning and participation online, and in their interactions with others. All students and staff have the right to expect good conduct and professional behaviour from others, and have a corresponding responsibility to behave professionally and with good conduct towards others. Online communications must in all ways meet the conditions of CNELM's policies concerning communications, dignity, equality, diversity, inclusion, and respect.
- Be careful to only share content that you have a right to make available under any law.

Staying safe when using social media and other online services:-

When using social media and other online services, you should think about how activity can impact your life (and the lives of others) outside of the online world. We recommend taking the following steps:

Protect your reputation. Consider how future employers may perceive your content and comments and bear in mind the permanence of what you post. Language, nudity and activities considered or interpreted to be offensive or antisocial may impact on your employability.

Avoid criminal activity. Abusive behaviour, bullying and 'trolling' can be illegal in some instances and may lead to criminal charges. Behaviour that is perceived by individuals to be hostile or prejudiced towards themselves or others, based on perceived or actual race, religion, gender, sexuality or disability, could be considered a hate crime or hate incident.

Think about what you post. Posting content obtained through deception or breaching the privacy of others (such as secretly-filmed video or content shared with you privately through apps) not only causes pain and embarrassment to others, but may also be considered illegal.

Keep your details private. Posting personal details such as your address, regular locations or student details can make you vulnerable to identity theft and other crimes. Always avoid putting your personal safety, or that of others, at risk. Security settings on social media can change, so review your privacy settings regularly.

Take reasonable measures to prevent the transmission of computer viruses, such as not opening email attachments received from unsolicited sources.

Maintain professional standards. Sharing social media content about your study, workplace and individuals while undertaking an online work experience placement, in a clinical training setting may conflict with data protection legislation, non-disclosure agreements or impact on the position of a company or organisation in the marketplace. You should never assume that you have consent to share personal information on any social platform (including closed groups and messaging services).

ANNEXE 4: CYBER SECURITY:

CNELM follows the principles and guidance detail in the [The National Cyber Security Centre](#) – and will refer to the latest infographics provided [HERE](#) for small businesses and individuals.

CNELM is in the process of developing and publishing a Cybersecurity Policy with appendices for password and Incident management policies.

If any member of the CNELM community thinks they have been a victim of a cyber-attack or their device/data has been compromised should report the incident and their concerns to the Centre Administrator immediately:

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