



Name of Policy:	Safeguarding Policy
Scope of Policy:	The policy sets out how the University performs its duty to safeguard and promote the welfare of children, young people and vulnerable adults who are enrolled on its courses or are visiting the institution.
Author and contact for further information:	Director of Student Services
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UNIVERSITY OF
LINCOLN

Safeguarding Policy

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Policy Statement

- 1.1 The University of Lincoln has a statutory, ethical and moral duty to ensure that the University functions with a view to safeguarding and promoting the welfare of children and vulnerable adults who are working at, enrolled on courses, or are visiting the University. Safeguarding is everyone's responsibility.
- 1.2 It is recognised that members of staff and students will come into contact with children and vulnerable adults in a number of settings, including:
- Teaching and learning environments
 - Student Services
 - Summer schools and school visits
 - Student Halls of Residence
 - Functions, conferences or events being held by the University
 - Students who are on professional placements
 - Work placements (work experience)
 - Agency, contract and temporary staffing arrangements
- 1.3 Throughout this document, reference is made to 'children and vulnerable adults'. 'Children' is used to mean 'those under the age of 18' (a more detailed description is available in the Care Act 2014). This policy also refers to 'vulnerable adults'. This term is used to mean a person aged 18 or over who meets the following criteria:
- Has needs for care and support (whether or not the local authority is meeting those needs)
 - AND is experiencing, or is at risk of experiencing, abuse or neglect
 - AND as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect (Care Act 2014)
- 1.3 The University is committed to ensuring that it:
- Provides a safe environment for children and vulnerable adults to work, study and live in.
 - Identifies children and vulnerable adults who are suffering, or likely to suffer, significant harm and take appropriate action to ensure their safety.
- 1.4 In pursuit of these aims, the Senior Leadership Team is responsible for regularly reviewing executive policies and procedures with the aim of:
- Raising awareness of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for them whilst they are at University
 - Aiding the identification of children and vulnerable adults at risk of significant harm, and providing robust procedures for reporting concerns and acting on these
 - Establishing procedures for reporting and dealing with allegations of abuse against members of staff and students

- The safe recruitment of staff and students
- 1.5 In reviewing relevant policies and procedures, the Senior Leadership Team will consult with, and take account of, relevant guidance and good practice, including liaison with the Lincolnshire Safeguarding Adults Board (LSAB).
 - 1.6 The University will refer concerns that a child or vulnerable adult might be at risk of significant harm to Lincolnshire County Council Customer Service Centre or the Emergency Duty Team, as agreed with the LSAB.
 - 1.7 All staff working with children or vulnerable adults will receive adequate training to familiarise them with protection issues and responsibilities and University procedures and policies. Specialist staff working in University support services will be required to undertake additional LSAB relevant training with any annual updates.

The Director of Student Affairs will have special responsibility as the designated senior member of staff with lead responsibility for the protection of students and children. The Director of Student Affairs shall have the authority to delegate responsibilities to the following members of staff:

- Head of Student Services/Deputy Director of Student Affairs
- Head of Student Wellbeing
- Head of Student Support

The Director of Human Resources will have special responsibility as the designated senior member of staff with lead responsibility for the protection of staff. The Director of Human Resources shall have the authority to delegate responsibilities to the following members of staff:

- Head of Diversity, Inclusion and Equality
- Head of Operations
- Head of Organisation Development

- 1.8 The University recognises the following as definitions of abuse:

Physical Abuse

Physical abuse causes harm to a child or vulnerable adult. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Neglect

Neglect is the persistent or severe failure to meet a child or vulnerable adult's basic physical and/or psychological needs. It will result in serious impairment of the child or vulnerable adult's health or development.

Sexual Abuse

Sexual abuse involves a child or vulnerable adult being forced or coerced into participating in or watching sexual activity, looking at or being involved in the production of pornographic materials or encouraging them to behave in sexually inappropriate ways. It is not necessary for a child or vulnerable adult to be aware

that the activity is sexual and the apparent consent of the child or vulnerable adult is irrelevant.

Emotional or Psychological Abuse

Emotional and psychological abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child or vulnerable adult's behaviour and emotional condition, resulting in low self-worth. Emotional and psychological abuse may be used to convince the child or vulnerable adult that another form of abuse was not abusive, or to induce self-blame, and so the child or vulnerable adult may not recognise that they are being abused. Some level of emotional abuse is present in all forms of abuse.

Financial Abuse

Financial abuse occurs when money is unreasonably denied to someone who is financially dependent, money is stolen, misused or information is withheld about welfare benefits.

Self-Neglect

Self-neglect occurs when someone fails to meet their own needs and maintain an acceptable level of self-care, including personal hygiene, nutrition, general wellbeing and proper management of any medical conditions.

Modern Day Slavery

Modern Day Slavery involves keeping someone in a position of slavery or servitude and inducing forced labour of an exploitative nature using control or coercion, often with little or no financial gain to the individual.

Human Trafficking

Human Trafficking involves facilitating or enforcing someone's travel for the purpose of exploitation, both across borders or within their own country. It is possible for someone to be a victim of Human Trafficking even if they appear to have given consent to travel.

Exploitation

Exploitation occurs when someone abuses or benefits from another for their own personal gain, to the detriment of the other person. The apparent consent of the child or vulnerable adult is irrelevant. Recognised forms of exploitation include forced labour, sexual exploitation, child exploitation and domestic servitude.

Harmful Sexual Behaviour

Harmful Sexual Behaviour refers to a range of inappropriate and unwanted sexual behaviours, which can occur both on and offline. Harmful Sexual Behaviour can include (but is not limited to) abusive or degrading remarks, stalking and harassment, taking or sharing private or intimate images without consent, unwanted sexual touching, sexual assault and rape.

Domestic Abuse

Domestic Abuse occurs when an individual uses controlling or coercive behaviours, including violence and abuse, against someone who is or has been their intimate partner or family member.

Bullying and Cyberbullying

Bullying is behaviour which is offensive, intimidating, malicious or insulting, and is an abuse or misuse of power through means intended to undermine, humiliate denigrate or injure the recipient. Cyberbullying occurs when this behaviour is conducted online.

Female Genital Mutilation (FGM)

Female Genital Mutilation refers to a group of procedures which involve the partial or complete removal of the external female genitals for non-medical reasons.

Honour Based Violence and Forced Marriage

Honour Based Violence refers to a range of behaviours and acts which are used within a family or social group to control someone, with the intention of protecting perceived cultural or religious beliefs or family and community honour. Honour Based Violence may involve Domestic Abuse and/or Sexual Abuse. Honour Based Violence is a human rights violation, for which there is no justification.

Forced Marriage is any marriage conducted without the meaningful consent of one or both individuals, where control, coercion or duress has been used.

Discriminatory Abuse

Discriminatory abuse occurs when an individual experiences abuse, exploitation or exclusion from an opportunity or service due to their age, gender identity, sex or sexual orientation, disability, marriage or civil partnership, pregnancy and maternity, race, religion or belief ('protected characteristics' under the Equality Act 2010)

Hate Crime

Hate Crime is an umbrella term which refers to a range of behaviours which are motivated by prejudice towards a specific aspect of a person's identity. Someone may experience a Hate Crime related to their gender identity, sexual orientation, religion or belief, race or ethnicity, or disability. A Hate Crime can occur online or offline.

The University and Prevent Duty

- 1.9 The University has a duty under the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism (the 'Prevent' duty). The University is required to respond to any concerns raised by the disclosures or actions of students or members of staff which could suggest that they have been influenced by extremist ideologies and radicalised, including where students or members of staff may be thinking about taking action based on those influences.
- 1.10 The Prevent duty extends to all forms of terrorism and non-violent extremism, which can create an atmosphere conducive to terrorism and popularise views which

terrorists then exploit. Preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The duty also requires intervening to stop people moving from extremist (albeit legal) groups into terrorist-related activity.

- 1.11 If you have concerns that a student or a member of staff may be in the process of being drawn into terrorism or may be vulnerable to radicalisation, you should promptly report your concerns, as you would with any other Safeguarding issue, to the Prevent Lead for the University who is the Director of Student Affairs or, in her absence, the Head of Student Services. The Director of Student Affairs and/or the Head of Student Services will ensure that any information regarding a student or member of staff will be shared confidentially and sensitively within the University and, if appropriate, seek advice from the local Prevent lead on any matters with regard to the ongoing welfare of the student or member of staff.

Students under the age of 18

- 1.13 Each year a small number of students who enrol at the University will turn 18 during the first term of their first year. The Director of Student Affairs is informed of all students who are under the age of 18, so that appropriate welfare and safeguarding procedures can be put in place.

Student Wellbeing are informed by Student Administration of those students who will be under 18 at enrolment. All of these students are contacted individually prior to their enrolment to inform them that they will be invited to a one to one meeting with the Head of Student Wellbeing after they have enrolled.

All students who are under 18 at enrolment are flagged on the Student Wellbeing system. One to one meetings take place with each student, which includes the provision of information and guidance around our responsibility and the student's responsibility, including underage drinking and drugs. Information is always sent to University venues to ensure their responsibility on checking of identification.

Annex 1 Designated Staff with Responsibility for Safeguarding

Senior Staff Members with Lead Responsibility

The designated senior member of staff with lead responsibility for child protection and the protection of students who are vulnerable adults is the Director of Student Affairs.

The designated senior member of staff with lead responsibility for the protection of staff members who are vulnerable adults is the Director of Human Resources.

The Director of Student Affairs and Director of Human Resources have a key duty to take lead responsibility for raising awareness within the University of issues relating to the welfare of children and vulnerable adults, and the promotion of a safe environment within the University.

Additionally, the Director of Student Affairs and Director of Human Resources are responsible for ensuring that the following take place:

- Oversight of the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with LSAB
- Oversight of provision of advice and support to staff and students on issues relating to the protection of children and vulnerable adults
- Oversight of maintaining a proper record of any child or vulnerable adult protection referral, complaint or concern (even where that concern does not lead to a formal referral)
- Ensuring that parents of children within the University are aware of the University's Safeguarding Policy
- Oversight of the liaison with the LSAB and other appropriate agencies
- Oversight of the liaison with organisations who send children or vulnerable adults to the University to ensure that appropriate arrangements are made
- Oversight of the liaison with employers and training organisations that receive children or vulnerable adults from the University on placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in safeguarding issues and are aware of the University protection policies and procedures.
- Ensuring that appropriate safeguards are in place for the management of contractors on University premises
- Ensuring that recruitment and selection policies for staff, and admissions policies for students, are regularly reviewed and adhered to.

The Director of Student Affairs and Director of Human Resources are responsible for reporting deficiencies in procedure or policy identified by the LSAB (or others) to the Senior Leadership Team at the earliest possible opportunity.

Designated Staff Members

Students

The designated member of staff with responsibility for student safeguarding issues is:

- Director of Student Affairs

The Director of Student Affairs will delegate to the following members of staff as appropriate:

- Head of Student Services/Deputy Director of Student Affairs
- Head of Student Wellbeing
- Head of Student Support

In the eventuality that these members of staff are not available, concerns should be directed to the Student Wellbeing Centre by calling **01522 88(6400)**.

Staff

The designated member of staff with responsibility for staff safeguarding issues is:

- Director of Human Resources

The Director of Human Resources will delegate to the following members of staff as appropriate:

- Head of Diversity, Inclusion and Equality
- Head of Operations
- Head of Organisation Development

The Director of Student Affairs and Director of Human Resources:

- Report to the Deputy Vice Chancellor for People Services and Operations on protection issues for children and vulnerable adults
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff and students on issues relating to the protection of children and vulnerable adults
- Have particular responsibility to be available to listen to children and vulnerable adults studying or working at the University
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Will have received Level 3 Safeguarding Training.

Designated Deputy Vice Chancellor

The designated Deputy Vice Chancellor with responsibility for child and adult protection issues is:

- Deputy Vice Chancellor, People Services and Operations.

The Deputy Vice Chancellor is responsible for liaising with the Director of Student Affairs and Director of Human Resources over matters regarding the protection of children and vulnerable adults, including:

- Ensuring that the University has procedures and policies which are consistent with the LSAB's procedures
- Ensuring that Senior Leadership Team reviews the Safeguarding of Children and Vulnerable Adults Policy each year

Annex 2 Procedures for Dealing with the Disclosure of Abuse and Reporting Concerns

If you think someone is being abused or you think their safety is at risk, then it is important to tell someone.

During University opening hours, you should contact the designated member of staff within the University as detailed in Annex 3.

If the University is closed and you are worried about a child or a vulnerable adult and think they may be a victim of neglect, abuse or cruelty, please call the Customer Service Centre (CSC) on **01522 782155**.

Outside office hours you should contact the Emergency Duty Team on **01522 782333**.

You do not need to know everything about the situation or what is happening. You may just be worried, or feel that something is not right.

If you believe that a crime has been committed and there is an immediate risk of danger, telephone the police on **999** or **112**. If a crime has been committed but there is no immediate danger, dial **101**

Disclosure from a child (under 18 years old)

If a child tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the child but question normally and without pressure to be sure that you understand what the person is telling you. It is important not to ask leading questions.
- Do not put words into the child's mouth.
- Reassure the child that by telling you, they have done the right thing and try to ensure immediate safety.
- Inform the child that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter. Do not offer confidentiality.
- Make a detailed note of the date, time, place, what the child said, did and your questions etc. Note the main points carefully for your detailed record.

Staff should not investigate concerns or allegations themselves, but should report them immediately to a designated staff member, as detailed in Annex 1.

Disclosure from an adult (18 years old or over)

If an adult discloses possible abuse to a member of staff:

- Listen carefully and stay calm.

- Do not interview the person but question normally and without pressure to be sure that you understand what the person is telling you. It is important not to ask leading questions.
- Do not put words into the person's mouth.
- Reassure the person that by telling you, they have done the right thing and try to ensure immediate safety.
- Identify the person's wishes with regards to sharing information or making a referral. The consent of the person making the disclosure should always be obtained before any action is taken, except in circumstances where the adult lacks capacity to give consent, others are deemed to be at risk of significant harm, or a criminal offence has occurred.

Judging mental capacity for an adult

Mental capacity: the Mental Capacity Act 2005 requires an assumption that an adult has full legal capacity to make decisions unless it can be shown that they lack capacity to make a decision for themselves at the time the decision needs to be made.

Individuals must be given all appropriate help and support to enable them to make their own decisions or to maximise their participation in any decision-making process. Unwise decisions do not necessarily indicate lack of capacity.

Any decision made, or action taken, on behalf of someone who lacks the capacity to make the decision or act for themselves must be made in their best interests. It is important that an individual's mental capacity is considered at each stage of the adult safeguarding process.

It is always essential in adult safeguarding to consider whether the adult is capable of giving informed consent in all aspects of their life. If they are able, their consent should be sought. This may be in relation to whether they give consent to:

- An activity that may be abusive – if consent to abuse or neglect was given under duress (e.g. as a result of exploitation, pressure, fear or intimidation), this apparent consent should be disregarded;
- An adult safeguarding enquiry going ahead in response to a concern that has been raised. The person must be given information and have the opportunity to consider all the risks and fully understand the likely consequences of that decision over the short and long term.

If, after discussion with the adult who has mental capacity, they refuse any intervention, their wishes will be respected unless:

- There is an aspect of public interest (e.g. not acting will put other adults or children at risk).
- There is a duty of care on a particular agency to intervene (e.g. the police if a crime has been or may be committed).

When to refer a safeguarding concern without a capacious adults consent

Personal information held by professionals and agencies is subject to a legal duty of confidentiality and should normally only be disclosed to third parties, including other organisations, with the consent of the subject of the information. However there may be times when it will be necessary to disclose information without the subject's consent.

Where an adult with capacity to make an informed decision about their own safety does not want any action taken, this does not override a professional's responsibility to raise a safeguarding concern and to share key information with relevant professionals e.g. where others are at risk or a criminal offence has been committed.

If there appears to be significant risk to the adult, and no one else, consideration should be given to whether their wishes should be overridden. The adult's wishes should not stop professionals from fulfilling their responsibilities in relation to duty of care, to continue to provide a service and regarding appropriate sharing of information.

In these situations the adult must always be:

- Advised about what information will be shared, with whom and the reasons for this.
- Advised that their views and wishes will be respected as far as possible by the local authority or other agencies in relation to any response they may have a duty to make.
- Provided with information regarding what happens when a local authority is advised of a safeguarding concern.
- Assured by the professional passing this information to the local authority, that their lack of consent to the information being shared, and their views and wishes regarding actions they do or do not want taken in relation to the situation as far as it affects them directly, will also be explained to the local authority.

Making safeguarding personal - "No decision about me without me"

Making Safeguarding Personal means working with an adult on their own terms, rather than deciding what is best for them. The adult should always be involved from the beginning of raising the safeguarding concern and the enquiry, unless there are exceptional circumstances that would increase the risk of abuse.

Making Safeguarding Personal is the approach taken to all safeguarding work. It is a shift in culture and practice in response to what is now known about what makes safeguarding more or less effective from the perspective of the adult being safeguarded.

The key principle of Making Safeguarding Personal is to support and empower each individual to make choices and have control about how they want to live their own life. This is about having conversations with them about how responses to safeguarding situations can be made in a way that enhances their involvement, choice and control as well as improving their quality of life, wellbeing and safety. It is about seeing people as experts in their own lives, and working alongside them to identify the outcomes they want.

Someone cannot make decisions about their life unless they know what the options are, and what the implications of those options may be. When safeguarding concerns are raised about adults who have care and support needs, who are at risk of or experiencing abuse or neglect and are unable to protect themselves, Adult Care will work with them or their representative or advocate to develop a real understanding of what they wish to achieve.

Annex 3 Procedures for Reporting and Dealing with Allegations of Abuse against Students and Members of Staff

1. These procedures apply to all staff, students, and any volunteers working in the University. Where students are also employed by the University and the allegation is pertaining to their role as a member of staff, the procedures relating to staff should be followed.

A Allegations Against Students

2. In some instances, students have been found to be responsible for the abuse of children or vulnerable adults who may also be fellow students.
3. The University recognises that an allegation of abuse made against a student may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and investigations are thorough and not subject to delay.
4. The University recognises that the welfare of the child or vulnerable adult is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a student can irreparably damage an individual's reputation, confidence and career. Those dealing with such allegations within the University will do so with sensitivity and will act in a careful, measured way.

Receiving an Allegation

5. A member of staff who receives an allegation about a student from a member of staff, a student, a child or vulnerable adult should follow the guidelines in Annex 2 for dealing with disclosure.
6. The allegation should be reported immediately to the Director of Student Affairs or her nominee. Nominees are:
 - Head of Student Services/Deputy Director of Student Affairs
 - Head of Student Wellbeing
 - Head of Student Support

In the eventuality that neither the Director of Student Affairs nor any of the nominees can be reached, the allegation should be reported to the Student Wellbeing Centre by calling **01522 88(6400)**.

7. The Director of Student Affairs will obtain details of the allegation from the person who received it. Where possible information about times, dates, locations and names of any potential witnesses should also be recorded.
8. If the allegation is made by, or is regarding the abuse of a member of staff, the allegation should also be reported immediately to the Director of Human Resources. In this instance the Director of Student Affairs and Director of Human Resources should jointly manage the allegation.

Initial Assessment by the Director of Student Affairs

9. The Director of Student Affairs will make an initial assessment of the allegation, consulting with the Director of Human Resources, Deputy Vice Chancellor for People Services and Operations, and the LSAB as appropriate. **Where the allegation is considered to be either a potential criminal act or indicates that the child or vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LSAB. This is a 24 hour responsibility.**
10. It is important that the Director of Student Affairs does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision about whether or not the allegation warrants further investigation.
11. Where the matter does not require reporting to the local LSAB, other potential outcomes are:
 - The matter can be addressed in accordance with the Student Conduct and Disciplinary Regulations.
 - The allegation can be shown to be false because the facts alleged could not possibly be true and no further action is required.

Enquiries and Investigations

12. Protection enquiries by Social Services or the Police are not to be confused with internal disciplinary enquiries by the University. The University may be able to use the outcome of external agency enquiries as part of its own procedures. The statutory agencies, including the Police, have no power to direct the University to act in a particular way; however, the University should assist the agencies with their enquiries within the confines of the General Data Protection Regulation and Data Protection Act 2018.
13. The University shall hold in abeyance its own internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing Student Conduct and Disciplinary Regulations Part C1 of the University Regulations.
14. If there is an investigation by an external agency, e.g. the Police, the Director of Student Affairs would normally be involved in, and contribute to, the inter-agency strategy discussions. The Director of Student Affairs is responsible for ensuring that the University provides every assistance with the agency's enquiries, within the confines of the General Data Protection Regulations. The Director of Student Affairs will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the student about whom the allegation is made. The Director of Student Affairs should advise the student that they should consult with a representative, e.g. the Students' Union, a parent or guardian or a legal representative.
15. Subject to objections from the Police or other investigating agency, the Director of Student Affairs should:
 - Inform the person making the allegation that the investigation is taking place and what the likely process will involve. The Director of Human Resources will be responsible for informing any members of staff who have made an allegation.

- Inform the student against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
 - Inform the Vice Chancellor for People Services and Operations of the allegation and the investigation.
 - Where appropriate, the Director of Student Affairs will ensure that the recorded parents/carers of a child making an allegation or the next of kin of a vulnerable adult who is making an allegation is informed.
16. The Director of Student Affairs shall keep a written record of the action taken in connection with the allegation and should consider any action under University Student Conduct and Disciplinary Regulations Part C1 of the University Regulations which should be taken, pending the outcome of the full investigation, to safeguard those who have made the allegation, any others who may potentially be at risk, and the student concerned.

Records

17. It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and any disciplinary action taken. If a student has appealed to the University, records will be held by the Secretariat. In other instances records may be held by the student's School or other relevant departments such as Student Wellbeing. The General Data Protection Regulation (GDPR) will be adhered to at all times.
18. If a student is removed from their course or chooses to withdraw from their course or the University before the disciplinary process is complete, documents relating to the matter will be retained in accordance with GDPR requirements and the University's retention schedule.

Monitoring Effectiveness

19. Where an allegation has been made against a student, the Director of Student Affairs and appropriate designated staff, at the conclusion of the investigation and any disciplinary procedures, should consider whether there are any matters arising from it that could lead to the improvement of the University's procedures and/or policies which should be drawn to the attention of the LSAB.

B Allegations Against Members of Staff

20. In rare instances, HE and FE staff in UK institutions have been found responsible for the abuse of children or vulnerable adults. Because of their frequent contact with children and vulnerable adults, staff may have allegations of abuse made against them. The University recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and investigations are thorough and not subject to delay.
21. The University recognises that the Care Act 2014 and Working Together to Safeguard Children 2015 states that the welfare of the child or vulnerable adult is the paramount

concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the University will do so with sensitivity and will act in a careful, measured way.

22. Receiving an Allegation

23. A member of staff who receives an allegation about another member of staff from a member of staff, a student, a child or a vulnerable adult should follow the guidelines in Annexe 2 for dealing with disclosure.
24. The allegation should be reported immediately to the Director of Human Resources, or her nominee. The nominees are:
 - Head of Diversity, Inclusion and Equality
 - Head of Operations
 - Head of Organisation Development
25. The Director of Human Resources will obtain details of the allegation from the person who received it. Where possible, information about times, dates, locations and names of potential witnesses should also be recorded.
26. If the allegation is made by, or is regarding the abuse of a child or a student, the allegation should also be reported immediately to the Director of Student Affairs. In this instance the Director Student Affairs and Director of Human Resources should jointly manage the allegation.

Initial Assessment

27. The Director of Human Resources will make an initial assessment of the allegation, consulting with the Director of Student Affairs, Vice Chancellor for People Services and Operations, and the LSAB as appropriate. **Where the allegation is considered to be either a potential criminal act or indicates that the child or vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LSAB. This is a 24 hour responsibility.**
28. It is important that the Director of Human Resources does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision about whether or not the allegation warrants further investigation.
29. Where the matter does not require reporting to the local LSAB, other potential outcomes are:
 - The allegation can be addressed in accordance with University Staff Disciplinary Procedures.
 - The allegation can be shown to be false because the facts alleged could not possibly be true and no further action is required.

Enquiries and Investigations

30. Protection enquiries by Social Services or the Police are not to be confused with internal, disciplinary enquiries by the University. The University may be able to use the

outcome of external agency enquiries as part of its own procedures. The statutory agencies, including the Police, have no power to direct the University to act in a particular way; however, the University should assist the agencies with their enquiries within the confines of the General Data Protection Regulation (GDPR).

31. The University shall hold in abeyance its own internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing Staff Disciplinary Procedures.
32. If there is an investigation by an external agency, e.g. the Police, the Director of Human Resources should normally be involved in, and contribute to, the inter-agency strategy discussions. The Director of Human Resources will be responsible for ensuring that the University provides every assistance to the investigation, whilst adhering to the General Data Protection Regulation (GDPR). The Director of Human Resources will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Director of Human Resources should advise the member of staff that they should consult with a representative, e.g. a trade union.
33. Subject to objections from the Police or other investigating agency, the Director of Human Resources should:
 - Inform the person making the allegation that the investigation is taking place and what the likely process will involve. The Director of Student Affairs will be responsible for informing any students who have made an allegation.
 - Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
 - Inform the Deputy Chancellor for People Services and Operations of the allegation and the investigation.

Where applicable, the Director of Student Affairs will ensure that the parents/carers of a child making an allegation have been informed that the allegation has been made and what the likely process will involve. In certain circumstances it may be appropriate to inform the recorded next of kin of a vulnerable adult making an allegation.

34. The Director of Human Resources shall keep a written record of the action taken in connection with the allegation and should consider any action under University Staff Disciplinary procedures which should be taken, pending the outcome of the full investigation, to safeguard those who have made the allegation, any others who may potentially be at risk, and the member of staff concerned.

Records

35. It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details are retained on the member of staff's personal and confidential file. The General Data Protection Regulations (GDPR) will be adhered to at all times.
36. If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the University's statutory duty to inform the LSAB.

Monitoring Effectiveness

37. Where an allegation has been made against a member of staff, the Director of Human Resources should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the University's procedures and/or policies and/or which should be drawn to the attention of the LSAB.

Annex 4 Recruitment and Selection Procedures, Staff and Students and Guidelines for the appointment of Contractors

Recruitment and Selection Procedures (staff)

1. The University has recruitment and selection procedures which are sensitive to the need for the University to reduce the risk of harm to children and vulnerable adults. These procedures take account of the following areas of good practice in relation to protection issues:
 - They apply to all staff who may work with children and vulnerable adults.
 - The role and key selection criteria are clearly identified.
 - They require documentary evidence of academic/vocational qualifications.
 - They contain the need to obtain professional and/or character references.
 - They will verify previous employment history.
 - Where required, DBS checks are carried out prior to confirmation of appointment and a central list is held of all clearances, the dates carried out and when renewal is due.
 - They use a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

Employment (staff)

1. The University takes reasonable steps to reduce the risk of harm to children and vulnerable adults during the term of employment of members of staff.
 - Where there is a regular potential for unsupervised contact with children and vulnerable adults then DBS checks will be undertaken
 - Offers of employment where DBS is required are subject to meeting the standards required or the offer will be withdrawn
 - All DBS disclosures containing convictions will be risk assessed
 - If a role changes then it may be identified as requiring a DBS check to be undertaken
 - Staff are required to notify Human Resources of any post-employment criminal convictions that may impact their employment at the University.

Recruitment and Selection Procedures (students)

1. The arrangements for the recruitment and selection of all students are detailed in the University Admissions Policy.
2. This Policy sets out the ways in which the University works to satisfy itself that it is not recruiting students who will pose a risk to children and vulnerable adults with whom they come into contact as part of their engagement with the University as a student.
3. Other than for the programmes referred to in Point 4 the University does not require applicants to declare any spent or unspent criminal convictions. This is based on guidance from the Information Commissioners Office following the introduction of the GDPR and the associated Data Protection Bill in May 2018. The University relies on the

National Probation Service to conduct full risk assessments as part of its obligations to safeguard communities. The University expects that the National Probation Service will contact it if any applicant or student who is under licence is assessed as posing a risk to its community.

4. For certain, specified, professional programmes, students are required to have a DBS check prior to starting their academic programme or prior to them coming into contact with children or vulnerable adults as part of their course.
5. Students are issued with photo ID at enrolment and should carry this with them at all times when they are on University premises

Guidelines for the Appointment of University Contractors

1. In appointing Contractors to undertake work on behalf of the University on its premises, the University takes into account the need to reduce the risk of harm to children and vulnerable adults. These guidelines take account of the following areas of good practice in relation to protection issues:
 - All contracted staff who work on University premises are required at all times to carry proof of identity supplied and verified by the University and which controls the areas of the University they are approved to enter
 - All contracted staff who have access to “sensitive” areas, such as Halls of Residence, will have been required to undertake a DBS check through their employer or to be accompanied at all times by an authorised member of University staff (or designated and approved contractor)

Annex 5 List of key contacts within the University

Student safeguarding

Judith Carey – Director of Student Affairs

01522 88 (6016)

01522 88 (6400)

If the Director of Student Affairs is not available, you should contact one of the following nominees:

Jacqueline Mayer – Head of Student Services/ Deputy Director of Student Affairs

01522 88 (6425)

01522 88 (6400) or 01522 83 (7080)

Julie Spencer – Head of Student Wellbeing

01522 88 (6486)

01522 88 (6400)

Rebecca Courtaux – Head of Student Support

01522 88 (5323)

01522 83 (7080)

Staff safeguarding

Ros Pepper – Director of Human Resources

01522 88 (6764)

If the Director of Human Resources is not available, you should contact one of the following nominees:

Paulina Babuchowska - Head of Diversity, Inclusion and Equality

01522 88 (6722)

Amanda Tait - Head of Operations

01522 83 (7743)

Tracey Laing - Head of Organisation Development

01522 88 (6621)

The designated Deputy Vice Chancellor with responsibility for child and adult protection issues is:

Julian Free - Deputy Vice Chancellor, People Services and Operations