



University of
Salford
MANCHESTER

Safeguarding Policy

Version Number 2.2

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Legal & Governance Directorate**

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Author	Summary of changes	Version	Authorised & Date
C. Price	General review, cross reference to Prevent duty and processes	V2.2	University Secretary: 23/05/2017
C. Price	Includes list of trained DSOs	V2.1	University Secretary 17/02/2015
M. Rollinson & C. Price	Major updates in legislation, vetting requirements and University structures	V2.0	Ops Board: 10 Sep 2014 Exec: 15 Sep 2014
M. Rollinson & J. Hinsley	Updates incorporating legislative changes (Independent Safeguarding Authority)	V1.1	
M. Rollinson, J. Clements, K. Ramsden & J. Hinsley	Document approved by SLT for consultation	V1.0	SLT
Policy Management and Responsibilities:			
Owner:	The University Secretary is the Policy owner and is the Principal Safeguarding Officer on behalf of the University. Major Policy changes will be submitted to VCET for authorisation.		
Others with responsibilities (please specify):	All subjects of the Policy will be responsible for engaging with and adhering to this policy.		
Author to complete formal assessment with the following advisory teams:			
Equality Analysis (E&D, HR) Equality Assessment form	1. <i>This is mandatory. July 2017</i>		
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Student facing procedures (QEO)	4. <i>N/A</i>		
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Staff Trades Unions via HR Students via USSU Relevant external bodies (specify)	1. <i>N/A</i>		
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The owner and author are responsible for publicising this policy document.			

1.0 Purpose

The purpose of this document is to specify University Policy for the safeguarding of children, and adults who may be considered vulnerable. The University aims to adopt the highest possible standards and to take all reasonable steps in relation to the safety and welfare of all people in the course of its work. The University will not tolerate the abuse, neglect or misuse of anyone.

The Policy also makes reference to directly relevant University policies and procedures (see Related Documentation).

This Policy is based on and incorporates elements of the following legislation, national and local guidance documents (including but not limited to):

- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children Act 2004
- Counter Terrorism & Security Act 2015
- Working Together to Safeguard Children 2015
- Disclosure and Barring Service Guidance documents
- Charity Commission Guidance documents
- Greater Manchester Safeguarding Procedures
- Salford Adult Safeguarding Policy

2.0 Scope

2.1 To whom the policy applies

This Policy applies to all members of University staff, University Council members, third party employees, associates, students and volunteers who in the course of their duties, whilst on University business, may have contact with children (i.e. individuals under 18 years old) or vulnerable adults (i.e. individuals over 18 who are vulnerable to harm or exploitation due to their personal situation and / or social circumstances). The people to whom this Policy applies are described collectively in the rest of this Policy as Members of the University Community.

Staff and students on work-based placement learning in clinical settings, health care and social care may come into regular contact with children and vulnerable adults. Students on work-based placement learning are encouraged to invoke the safeguarding policy and procedures of the organisation in which they are carrying out their placement. However, if this is not appropriate or if no action is taken, students are encouraged (with the support of their Personal Tutor or Placement Tutor) to follow this Safeguarding Policy for reporting of safeguarding concerns (Appendix B).

Education institutions which are partner organisations to the University will have their own safeguarding policy and reporting procedures in place. Members of those institutions are advised to consult with and follow their own organisation's safeguarding policy as the first course of action.

The University expects the following agencies (external to the University) to be familiar with this Safeguarding policy:

- external event organisers who may run activities for children or vulnerable adults on University premises;

- contractors/third party agencies carrying out work on behalf of the University.

2.2 Definitions

Child/Children – a person or persons under the age of 18 years. The individual may also be studying or working at the University.

Vulnerable adult – a person who is over 18 who is, or may be in need of, community care or health care services by reason of mental or other disability or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation (including risk of radicalisation or being drawn into terrorism). It should be noted that a person can become vulnerable as a result of specific circumstances or situations which may increase the risk of exploitation. The individual may also be studying or working at the University.

2.3 University work that may bring contact with children and / or vulnerable adults

These scenarios include (but are not limited to):

- teaching, supervision and support of students;
- conference office bookings for halls of residence, leisure facilities etc;
- widening participation initiatives taking place on or off campus as well as summer schools or other events such as work experience;
- placements with health and social care institutions as part of professional training or provision of podiatry, complementary medicine or other treatments;
- provision of counselling, occupational health or other welfare services for students or staff;
- research related to any of the above areas; and
- excursions, volunteering and other social activities or student societies.

While some of the above scenarios may not come within the scope of required vetting for employees or students, the University has a duty of care to ensure risks to vulnerable groups are managed. It may be relevant for the 'owning' School or Professional Service to carry out a risk assessment (see Related Documentation section) of the situation and put in place appropriate procedures to minimise risk. Such procedures may include: advance notification of a scheduled event to the Estates Security team (in order to enable a considered response in line with their existing team operating procedures); instructions and briefings about expected conduct for relevant staff within the Leisure Centre; (See Appendix D) or Safeguarding Policy for the 3rd party operated Halls of Residence; or contact with children only when Summer School/supervising staff are present.

2.4 This policy does not cover:

- Specific vetting requirements for particular student or employee roles i.e. recruitment, selection and employment procedures. See Related Documentation;
- Busybees nursery on University premises; as an independent organisation it is covered by its own comprehensive child protection policies in accordance with legislation and Ofsted requirements; and
- A general duty of care for visitors on University premises is not included in this Safeguarding Policy. This is referenced in the University Health & Safety Policy and subsidiary documents.

3.0 Policy Statements

3.1 Guiding principles of safeguarding

The University applies the following core principles to safeguarding:

- a. Members of the University Community who have regular contact, as part of their work or studies, with children or adults who may be vulnerable, should:
 - ensure they understand the implications of this Policy before commencing any programme, event, visit or other activity and should ensure appropriate risk assessments have been completed (see Related Documentation section). Safeguarding training should be incorporated into relevant programmes of study and / or briefings for students undertaking work-based placement learning; and
 - be responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions (see Appendix D).
- b. Members of the University Community should never leave a safeguarding concern unreported. The University will take all safeguarding concerns (including suspicions and allegations of harm, abuse, or exploitation, including radicalisation) seriously and will report concerns promptly. If there is immediate risk of harm to an individual ring the Police on 999.
- c. Any information relating to safeguarding concerns shall be handled in accordance with the Data Protection Act 1998. There may be occasions where a safeguarding concern is shared without the consent of the individual, as obtaining consent could place an individual at increased risk of harm or it could undermine the investigation, prevention, detection or prosecution of a serious crime.
- d. The University have implemented a risk based approach to the development of policy and practice around safeguarding. Areas deemed to be of higher risk are outlined below and form the 'core' of the University safeguarding approach:
 - i. Student/Employment vetting;
 - ii. Admission of Students under 18 years; and
 - iii. Dealing with suspicions or allegations of abuse.

3.2 Student/Employment vetting

Where the University has a **legal requirement** to vet employees, students or volunteers who are carrying out work and work-based placement learning with children or adults who may be vulnerable, the University has in place policies that require such checks to have been satisfactorily completed.

HR is responsible for managing/overseeing employee vetting as specified in the Recruitment Code of Practice. Where contract workers supplied by a third party are involved and where the role requires satisfactory vetting clearance, the University will require that third party to undertake the necessary checks on the contract workers. Individual Schools within the University are responsible for managing student vetting (See Related Documentation section).

3.3 Admission of Students under 18 years

The University has in place specific policies and procedures around managing applications from, and monitoring the welfare of, students who are under 18 years of age. (see Related

Documentation section) These policies and procedures include initial application, risk assessment, relevant employee vetting, advice and offer of meeting with the potential student and guardians, acceptance of terms and conditions as well as on-going arrangements for welfare monitoring.

3.4 Dealing with suspicions or allegations of harm, abuse or exploitation

Members of the University Community who have contact with children or vulnerable adults have a responsibility to be alert to the possibility that an individual may have been harmed or exploited. While indicators of harm, abuse or exploitation can be very difficult to recognise (See Appendix A), it is not a member's responsibility to decide **whether** harm has occurred, but only to raise concerns that an individual **may be or may have** been harmed or exploited. The following structures are in place to support members of the University Community with this responsibility:

3.4.1 Network of safeguarding officers

The University Secretary is the Principal Safeguarding Officer and shall be responsible for overseeing the management of safeguarding issues within the University. Relevant staff members (in those Schools and Professional Services which primarily have contact with children or vulnerable adults) will become Designated Safeguarding Officers (DSOs) to receive and respond appropriately to safeguarding concerns within the University. Appendix A outlines types and some possible indicators of harm or exploitation.

3.4.2 Safeguarding training

The Principal Safeguarding Officer and the DSOs will undergo relevant safeguarding training and attend refresher training as appropriate. This may include input from Social Services (Children and Adult Safeguarding) and/or Police, as well as input on the handling of confidential information. See Related Documentation section for links to the Salford Social Services Children and/or Adult Safeguarding Reporting Forms.

3.4.3 Reporting process within the University

- a. The DSOs will act as the points of contact within the University for the receipt and recording of safeguarding concerns. See Appendix B for Safeguarding Concerns Reporting Process and list of DSOs.
- b. In handling safeguarding concerns, the University recognises that it has a duty of care both to the subject of the safeguarding concern and, for the purpose of protecting against false or malicious allegations) to the members of the University Community about whom an allegation may have been made.
- c. Staff or DSOs dealing with students or staff who are subject to safeguarding concerns will consider what support may be offered to them both from within the University (e.g. Wellbeing & Counselling for Students via Student Experience & Support or HR advice and Counselling Service for Staff) and externally (e.g. GPs and other health services). They will be encouraged to seek support and will be reminded of the support services provided by the University.
- d. The DSOs, on behalf of the University, may establish facts about the safeguarding concern, but will pass on the concern to Social Services or the Police for investigation and action. Where safeguarding concerns relate to possible radicalisation or being drawn into terrorism, the relevant DSO must

discuss the matter further with the University Secretary (as Principal Safeguarding Officer, who is also the University Prevent Lead. It may be more appropriate for Safeguarding concerns relating to radicalisation to be referred by the University to the Salford Channel Panel (which is a multi-agency group providing targeted support in such cases).

- e. The University will follow the principles outlined in the Greater Manchester Safeguarding Procedures (see Related Documentation). Guidance on making a written statement as part of the Safeguarding Reporting Process is included at Appendix C.
- f. If a member of the University community (other than one of the DSOs) makes a referral directly to Social Services or the Police in an emergency situation, they should notify the Principle Safeguarding Officer that a referral has been made as soon as reasonably practical (see Appendix B). The University may liaise with the local Safeguarding Board/Social Services as appropriate.

3.5 Referral to the Disclosure and Barring Service (DBS) and internal procedures

In relation to a safeguarding allegation about a member of the University community, the University will defer initiation of its own procedures (i.e. Fitness for Professional Practise or Student/Employee Disciplinary) until any external processes (including: investigations, criminal or other legal proceedings) are complete. Procedures (whether externally or by the University) may include a referral to external bodies such as the DBS, Charity Commission, HEFCE and any relevant professional body.

3.6 Periodic review

The University Secretary will, as necessary, arrange and chair a Safeguarding review meeting with the DSOs to ensure this safeguarding policy and supporting procedures remain effective and continue to operate in accordance with any new legislation.

4.0 What happens when the policy is not followed

Where a safeguarding concern has been raised, it **must** be reported and discussed with the relevant team in Social Services (and/or the Police). This will ensure that the risks are managed and appropriate action is considered. It is not an option to 'wait and see' or to dismiss the concern as not relevant. Failure to report suspicions/allegations of harm, abuse or exploitation (including radicalisation) as per the Safeguarding Concerns Reporting Process (App B) in a timely or appropriate manner will be treated seriously and may be investigated in accordance with the relevant University disciplinary policy. Where appropriate, failures to report safeguarding concerns may also be referred to external agencies such as the Police or Social Services for consideration of further action.

5.0 Related Documentation

A. Documents available via the HR Document Finder:

<http://www.salford.ac.uk/hr/policies-and-forms>

- Recruitment Code of Practice
- Consensual Relationships Policy
- Disciplinary Policy – Employees
- Health & Safety Policy
- Risk Assessment Code of Practice and Form
- Limitations on bringing Children onto University premises

B. Policies Available via University Policy & Procedures

pages <http://www.salford.ac.uk/policies>

- Student Vetting Policy (Academic Governance)
- Admission of Students under 18 years of age
- Student Disciplinary Policy
- Work Based and Placement Learning Policy
- Fitness for Professional Practice Procedure

C. University advice pages

- Student Wellbeing and Counselling <http://www.askus.salford.ac.uk/wellbeing>
- Staff Occupational Health <http://www.salford.ac.uk/hr/occupational-health>
- University approach to Prevent <http://www.salford.ac.uk/about-us/corporate-information/the-prevent-duty>

D. Salford Social Services Child and Adult Safeguarding Pages

Salford Social Services have different template reporting forms for Child or Adult Safeguarding concerns. **Under no circumstances should you begin an investigation into the safeguarding issue yourself. Please note facts then speak to the relevant Salford Social services team below:**

Children

Always speak to a member of the Social Services Children's Safeguarding team first on 0161 603 4500 before completing or sending any form.

<http://www.salford.gov.uk/children-and-families/safeguarding-children/worried-about-a-child/>

Adults

Always speak to a member of the Social Services Adult Safeguarding team first on 0161 631 4777 before completing or sending any form.

<http://www.salford.gov.uk/health-and-social-care/safeguarding-adults/>

6.0 Appendices

Appendix A: Types and possible indicators of harm, abuse or exploitation

Appendix B: Safeguarding Concerns Reporting Process (listing DSOs)

Appendix C: Checklist for Staff making a written statement

Appendix D: Recommended Behaviour when dealing with Children or vulnerable Adults

Appendix A: Types of Abuse or Harm

This Appendix broadly lists types of abuse or harm that children (anyone under 18 years) or vulnerable adults (adults with care and support needs) may encounter (this list is not exhaustive):

Emotional / Psychological: persistent action or inaction by others that causes mental anguish or severe adverse effects on a child's or adult's emotional development. This can include "grooming" to draw or encourage people towards particular actions or extreme views – it isn't solely about drawing a person into sexual activity. Getting someone else to do something illegal is a form of harm and exploitation.

Physical: any intentional physical contact that results in discomfort, pain or injury including a parent or carer fabricating symptoms or deliberately inducing illness to a child or adult

Sexual: including any form of sexual activity with a vulnerable adult or child under the age of consent or coercion or force to take part in sexual acts including non-contact abuse or being forced to watch inappropriate images and the use of the internet/ technology

Neglect: Failure to identify and / or meet care needs or adequate supervision

Institutional: maltreatment of a person from a system of power

Financial: Usually associated with the control or misuse of money, valuables or property. This could also include generous gifts or clothing to make a person feel indebted or that they 'owe' the giftgiver

Discriminatory abuse: including racist, sexist, ageist, homophobic abuse or based on a person's disability, and other forms of harassment, slurs or similar treatment. This can include negatively influencing a person's views and actions against a group or part of society. If you become aware of bullying and harassment against someone who is not defined as vulnerable, we would still advise you speak with the relevant support

Internet/electronic abuse: the use of modern communication technologies (e.g. internet, text or video messaging, e-mail, chatrooms, social media such as snapchat or instagram) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them or to influence towards particular views about people or society. Often closely linked with child sexual exploitation and the posting of illegal images but can be relevant generally to 'grooming' or drawing people towards extreme views or actions.

It is important to note that harm, abuse or exploitation is a violation of an individual's human and civil rights by any other person or persons. It can:

- Consist of a single act or repeated acts or multiples types of harm;
- Be intentional or unintentional or result from a lack of knowledge;
- Be an act of neglect, an omission or a failure to act;
- Cause harm temporarily or over a period of time;
- Involve taking advantage of existing vulnerabilities and needs that a person has: people in need of identity, friendship or care, who are frustrated, lost or feel they don't fit in;

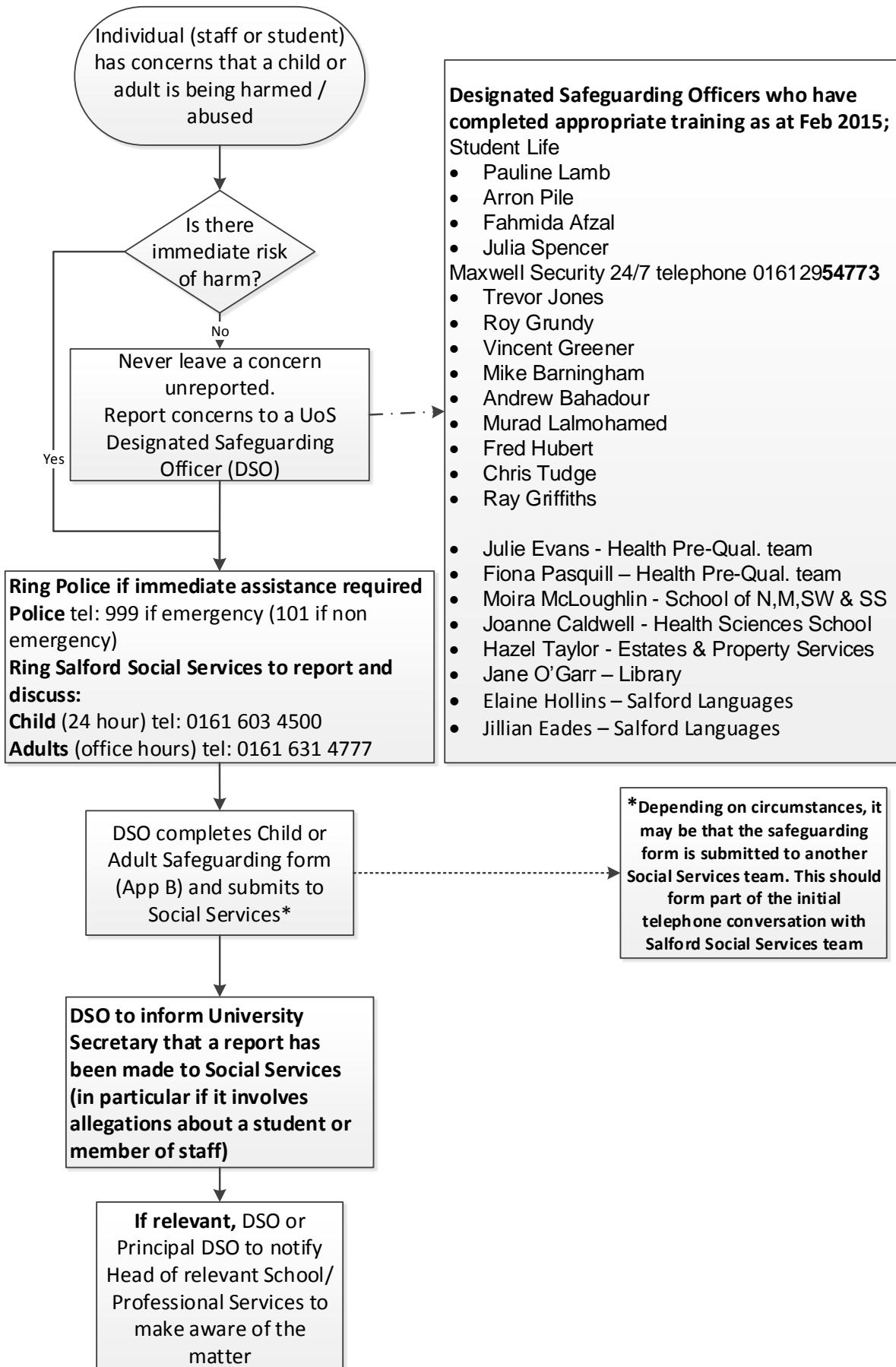
- Involve manipulating or 'grooming' someone to get benefit or advantage or to make the person do something illegal or manipulating or dehumanising emotions to see others as outsiders and non-human – justifying actions – “they deserve it”;
- Occur in any relationship; or be perpetrated by anyone, individually or as part of a group or organisation;
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on computer equipment.

The following may indicate that harm is taking place (this list is not exhaustive):

- An accumulation of many changes in behaviour or appearance e.g. emotional, verbal and social behaviour as well as physical changes
- Any allegation of mistreatment
- Sudden, significant or unexplained change in behaviour
- Inappropriate sexualised or risky behaviour
- Concerns or injuries without an adequate explanation
- Change in attitudes, defensive, quick to anger
- Isolated and withdrawn or conversely forcing opinions on others
- Non or poor attendance, change in standard of work
- Physical and clothing changes
- Being singled out and actively being discouraged from contact with friends and family

Some of the above signs may just indicate that an individual needs some support. Please remember that a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation. Please be aware of the different sources of support for students (Wellbeing & Counselling team) and staff (HR Advice and Occupational Health) within the University

Appendix B: Safeguarding Concerns Reporting process (Updated April 26th 2017)



Appendix C: Checklist for staff making a written statement

As part of a Safeguarding Referral to Social Services or the Police you (and / or the Designated Safeguarding Officer) may be required to make a statement about what happened. A written statement is intended to inform other people about what exactly happened that might have harmed the child or adult at risk. This checklist is intended to help you to make a statement (written record) covering the main issues.

1	A statement should be written in black ink as it photocopies better (or typed and printed). Include your name and date you wrote the statement.
2	Use paper with the University logo and do not use your home address, telephone number etc.
3	Use handwriting where possible and make the statement as soon after the event as possible.
4	Write in the first person 'I saw.....'
5	Number the pages if more than one i.e. 1 of 3; 2 of 3; 3 of 3 etc.
6	A statement should not express opinions, especially about matters outside your expertise. Keep to the facts.
7	Head the statement with a reference to the nature of the incident or situation, the date of the incident and the vulnerable adults name and date of birth.
8	Clearly state your name, designation, place of work, your duties and responsibilities.
9	Give accurate details of time, date and place of the incident.
10	Give accurate details of where the incident occurred – you might need a sketch plan i.e. the address, the room, the layout of the room etc.
11	Set out the sequence of events in a time ordered way, saying only what your involvement was.
12	State clearly what you saw happen. If this was reported to you say so and record what was told to you.
13	Where a conversation took place record what was said, by whom, and what questions were asked, as far as you can remember.
14	If you cannot be sure about a certain aspect of the incident then say so.
15	If you acted with someone else state 'and I agreed that I should do this with....' (Give their name, designation etc.)
16	If other documents (e.g. user records, accident report forms, day books etc.) are relevant, refer to them in your statement.
17	When referring to any person identify them by their full name and designation (job) as they may be easily identified if they need to be contacted.
18	Make a statement about what effect you think the incident had on the victim – were they harmed in any way. Say what you base this judgement on.
19	Make a statement of any background information you think may help others understand what had occurred – the victim had behaviour that could be challenging; you were the only member of staff on duty; how the service usually runs, etc.
20	Say who you contacted at the time, your line manager, CQC, Social Worker etc.
21	Where alterations are made date and sign the changes you made – put a single line through the part you want to alter, do not cover the original text with white covering such as Tipp-Ex.
22	Always give the time and date when you wrote the statement and sign it.

Remember that any hard copy information you use or refer to, should be locked in a cupboard as it is very sensitive information. Alternatively the information should be scanned ('Scan to You' via University Multi-Function Printers), and you save the information to your F drive (accessible only to you - using your username and password).

Appendix D: Recommended behaviour when dealing with Children or Vulnerable Adults

This advice relates to University work with **children**: anyone under 18 years of age **and** may be a student at the University; or **vulnerable adult**: anyone who is 18 years or over; who is or may be in need of community care services by reason of age, mental illness, other illness or disability; **and** who is or may be unable to take care of him or herself; **or** unable to protect him or herself against significant harm or exploitation **and** may be studying or working at University.

Your work may occasionally **require** you to carry out some of the 'Don'ts' such as physical contact or working in a 1 to 1 situation. Please do use common sense and continue your work, but also use your discretion to ensure your actions are **necessary and appropriate** in line with University policy and guidance. Where possible, **arrange in advance** for another staff member to be present, or inform them where you will be, how long and who you're with.

Staff should:

- ✓ Ensure welfare of the students (or subjects of the activity) always comes first regardless of aims of activity being carried out.
- ✓ Keep relationship on a professional footing, avoiding personal social contact. Try to separate personal and professional use of social media. Failure to do so may leave a staff member open to charges of bias (and could lead to disciplinary action).
- ✓ Ensure your dress and appearance are appropriate to your role, i.e. dress decently, safely and appropriately for the tasks you undertake and avoid clothing that is likely to be viewed as offensive (e.g. containing political or otherwise contentious slogans including sexually offensive slogans).
- ✓ Ensure that any accidents involving individuals (whether children or adults) in their care are reported in accordance with University procedure (or other relevant organisation e.g. school trip).
- ✓ Treat all individuals equally and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership; pregnancy and maternity, race, religion and belief, sex or sexual orientation.
- ✓ Be aware of and comply with the Safeguarding Policy and the Consensual Relationships Policy. In particular "Under the Sexual Offences Act 2003 it is an offence for anyone over the age of 18 working with young people (for example teachers, student mentors, academic staff etc.) to have a sexual relationship with a young person under the age of 18 who is in full time education."

Staff should avoid:

- × Working alone with a child / children or vulnerable adult. Always arrange for another adult to be present or be in an open or overlooked area or alternatively notify another member of staff and ensure he or she is nearby. This includes offering lifts to a child.
- × Entering children's rooms (bedrooms or changing rooms) unless it is essential. Staff should take particular care and be aware of the child / children's right to safety, privacy and decency if contact of an intimate nature is required. Do not invite a child into your bedroom.
- × Taking advantage of the position of trust that you are in as a staff member (in relation to any students).
- × Behaving in any manner that would leave any responsible person to question your suitability to work with children or vulnerable adults.
- × Physical contact that could be open to misinterpretation by the child or a third party. Even when applying first aid staff should use discretion to ensure contact is necessary and appropriate.
- × Conferring special attention and favour upon a particular individual or group of students or act in a manner that could be open to misinterpretation.
- × Using or allowing others to use over familiar or sexually suggestive comments, inappropriate language or behaviour.