



University of
Salford
MANCHESTER

Safeguarding Policy

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Author:

General Counsel, Legal & Compliance Directorate

Safeguarding Officer, Student Experience and Engagement

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Craig Best	Amended name contact for Safeguarding Officer	V3.1	Head of Student Experience and Engagement: 20.12.19
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C. Price	General review, cross reference to Prevent duty and processes	V2.2	General Counsel: 23/05/2017
C. Price	Includes list of trained DSOs	V2.1	General Counsel 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	
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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.		
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[University of Salford Policy pages http://www.salford.ac.uk/policies](http://www.salford.ac.uk/policies)**The owner and author are responsible for publicising this policy document.**

1. 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. This policy aims to ensure that all children, young people, vulnerable adults and those who work with them are safe and supported in our University.

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
- Care Act 2014
- Children Act 2004
- Children Act 2004
- Counter Terrorism & Security Act 2018
- Working Together to Safeguarding Children 2018
- Disclosure and Barring Service Guidance documents
- Charity Commission Guidance documents
- Greater Manchester Safeguarding Procedures
- Salford Adult Safeguarding Policy
- Safeguarding Vulnerable Groups Act 2004
- Protection of Freedoms Act 2012

2. Scope

2.1 Definitions and Interpretations

See Annex. A

2.2 To whom this 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. 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.

2.3 Definition of Safeguarding

For the purpose of this policy, safeguarding means protecting the health, wellbeing and human rights of individuals at risk, enabling them to live safely, free from abuse and neglect.

Safeguarding Children is further defined in as:

- a. protecting children from maltreatment
- b. preventing impairment of children's health or development
- c. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- d. taking action to enable all children to have the best outcomes¹

2.4 University work that may bring contact with children, young persons 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;
- Outreach and 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 subjects; 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

¹ HM Government, 2018. Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. Available online via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf [Last accessed 3rd June 2019]

relevant staff within the Leisure Centre; or Safeguarding Policy for the 3rd party operated Halls of Residence; or contact with children only when Summer School/supervising staff are present.

2.5 Defining Vulnerability

The University will endeavor to identify vulnerable students deemed to be at risk and put appropriate measures into place to fully support them. For the purpose of this policy, vulnerability is defined as

a person who is or may be in need of community care services by reason of mental or other disability, age or illness;

who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation².

In a university setting, factors which may indicate vulnerability include:

- Physical or mental disabilities;
- Language or community difficulties;
- Learning differences;
- Social isolation;
- International or refugee status;
- Health conditions, particularly those long term;
- Drug or alcohol dependence;
- Care leavers or estrangement;
- Homelessness;
- Permanent or temporary reduction in physical, mental or emotional capacity, brought on by significant life events.

2.6 This policy does not cover:

- Specific vetting requirements for particular student or employee roles i.e. recruitment, selection and employment procedures. See Related Documentation;
- Busy Bees 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.

2.7 Roles and Responsibilities

Safeguarding is the responsibility of **everyone** in the University community. We all have a role to play in keeping ourselves and each other safe and have a duty to take action if we are concerned for the wellbeing of another, whether this is on University premises or not.

² Department of Health, 2018. No secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/194272/No_secrets_guidance_on_developing_and_implementing_multi-agency_policies_and_procedures_to_protect_vulnerable_adults_from_abuse.pdf [last accessed 23rd April 2019]

The following structures are in place to support members of the University Community with this responsibility:

Principal Safeguarding Officer

Responsibility: Accountable for all Safeguarding concerns at the University, and responsible for overseeing the management of safeguarding issues within the University.

Named Person: Andrew Hartley, Director of Legal and Compliance

Safeguarding Officer

Responsibilities: Responsible for centralised operational safeguarding and Prevent provision at the University.

- Oversee the training of the Designated Safeguarding Officers and staff members as necessary;
- To develop and reform safeguarding policy and procedure across the University

Named Person: Craig Best, Head of Student Experience and Engagement & Interim Safeguarding Officer

Designated Safeguarding Officer(s)

Responsibilities:

- To provide localised safeguarding advice and support to the University community;
- To support relevant members of staff to make a referral to social services and/or police.

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.

Names Persons: A list of DSOs can be found via Salford.ac.uk/safeguarding

Heads of Schools/ Directors/ Deans

Responsibilities:

- To work with Designated Safeguarding Officers to ensure appropriate risk assessments are carried out for relevant activities;
- Liaise with Human Resources to ensure appropriate DBS checks are taking place.
- Closely monitor the welfare of staff/ students under the age of 18, in conjunction with Student Support where necessary, in accordance with Keeping Children Safe in Education 2018.
- Ensure all staff compliance with this safeguarding policy as an **absolute priority**;
- Ensure all safeguarding concerns are referred to the appropriate Designated Safeguarding Officer.

All staff

Responsibilities:

- Treat all safeguarding concerns as an **absolute priority**, and follow guidance laid out in this policy;
- To report any concerns about safeguarding **immediately** to a Designated Safeguarding Officer;
- To help foster a safe and inclusive community for all staff/ students;
- Ensure that they support and promote the values of democracy, rule of law and mutual respect and tolerance of those with different faiths or beliefs;
- Complete the Safeguarding e-Learning module.

All students**Responsibilities:**

- To report any concerns about a student's wellbeing to the University
- To help foster a safe and inclusive community for all adults and young people.

2.7.1 Safeguarding training

The Principal Safeguarding Officer, 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. 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 Annex C).
- 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. Disclosure and Barring (DBS) checking;
 - iii. Admission of Students under 18 years;
 - iv. Dealing with suspicions or allegations of abuse.

3.2 Staff and 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).

Appropriate vetting includes:

- Identity check;

- Two references;
- Criminal convictions and Good Conduct declaration – any convictions, cautions, reprimands, warnings and any current criminal investigations taking place.

And where required (see 3.2.1):

- Countersignature of Disclosure and Barring Service application;
- Satisfactory DBS clearance and barred list checks;
- Certificate of good conduct from Embassy or police force for international students;
- Satisfactory health clearance and a Fit to Train certificate issued.
- Submission of a Pre-Acceptance Health Assessment – Fitness to Train Questionnaire
- Attendance at a Nurse Assessment Appointment & compliance with immunisations & blood tests recommended
- Attendance, if appropriate, with the Occupational Health Physician & compliance with any course of treatment or follow with OH or specialties up advised

Failure to satisfy the necessary vetting requirements may result in a withdrawal of offer or place even if the individual has already registered.

The relevant School (or Professional Services Unit where applicable) will ensure that the programme/ post/ work required is legally eligible for a criminal records check via the Disclosure and Barring Service (DBS).

The individual must complete the necessary applications and assessment forms themselves. The University cannot, and will not, make applications on the individual's behalf.

Staff or students working with a child or young person should familiarise themselves with the Code of Conduct in Annex B.

3.2.1 Disclosure and Barring (DBS) and Recruitment

The Disclosure and Barring Service (DBS) helps organisations identify candidates who may be unsuitable for certain types of work with the University, particularly work involving contact with children, young people and vulnerable adults.

A DBS check is a requirement of Professional Regulatory Bodies for programmes which involve working or volunteering with children, young people or vulnerable adults.

Other roles within the University will be subject to DBS check prior to engaging with the University in a paid or voluntary capacity. There are varied levels of DBS check available depending on the type of work to be undertaken.

Levels of Disclosure

Standard Check

Checks undertaken: Unspent and spent convictions/ cautions held on the Police National Computer

Examples of types of work undertaken: Positions not working with children or vulnerable adults

Enhanced Check

Checks undertaken: Unspent and spent convictions/ cautions held on the Police National Computer plus information held locally by Police which is considered to be 'reasonably relevant' to the post.

Examples of work undertaken: Supervised activities with children which would be classified as 'regulated activity' if unsupervised; infrequent activities with children which would be considered 'regulated activity' if frequent; activities with vulnerable adults that are not deemed as 'regulated activities'

Enhanced Check for Regulated Activity

Checks undertaken: Unspent and spent convictions/ cautions held on the Police National Computer plus information held locally by Police which is considered to be 'reasonably relevant' to the post, plus a check against the Adult or Barred list of individuals who must not work with these groups.

Examples of work undertaken: Unsupervised 'regulated activities' with children on a regular basis; working in a 'specified place' (children); specified activities with adults deemed as vulnerable when in receipt of those activities

3.2.2 Definitions of Regulated activities

The full definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

Regulated activity relating to children

- i) Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on wellbeing, or drive a vehicle only for children;
- ii) Work for a limited range of establishments ('specified places'), with opportunity for contact, for example: schools, children's homes etc.;
- iii) Relevant personal care, e.g. washing, dressing, healthcare by or supervised by a professional;
- iv) Registered child-minders.

Work under i) and ii) is a regulated activity only if done regularly.

Regulated activity relating to adults

- i) Providing healthcare;
- ii) Providing personal care;
- iii) Providing social work;
- iv) Assisting with cash, bills and/or shopping;
- v) Assistance with the conduct of a person's own affairs;
- vi) Conveying.

Regulated activity excludes family arrangements, and personal arrangements.

The University of Salford fully complies with the **DBS Code of Practice**, which sets out obligations for everyone participating in the Disclosure process.

3.2.3 Student Admissions to programmes requiring DBS checks

For students applying for courses requiring a DBS check, the relevant School (or Professional Services) Admissions Panel will meet as required during the admissions cycle. This will include:

- Dean or Deputy Dean of School/ Director of Professional Service;
- Director of Admissions/ Associate Director of Professional Service;
- School Operations Manager / staff member nominated by Director
- Regulatory Body Education Manager / DBS Administrator;
- Academic member of staff who is a registrant with a professional/regulatory body from relevant profession of cases being considered.

The Admissions Panel will follow the relevant Professional Bodies' 'Fitness to Practice / character information guidelines' and will apply the following criteria when considering entry onto programmes requiring DBS/Health clearance/any other declared information:

- Nature and gravity of the offence(s);
- Age and time of the offence;
- Length of time since the offence;
- Number of offences;
- Any pattern of offences;
- The Nature and gravity of the offence(s)
- Age at the time of the offence;
- Length of time since the offence;
- Number of offences;
- Any pattern of offences;
- The severity of the sentence;
- Relevant of offence to profession;
- Applicants response to offence and rehabilitation;
- Public trust;
- Rehabilitation of Offenders Act (1975) and related guidance;
- Report from Programme Leader of students who are not fit to train;
- Circumstances regarding any child/children placed upon a child protection register, a child protection plan or placed in care.

The applicant should contact the DBS immediately if they believe the information on the DBS certificate to be inaccurate and notify the Admissions Panel as soon as possible. The onus is on the student to resolve the situation with DBS.

The Admissions Panel will notify the applicant of the decision in writing, within seven working days of the meeting. If criminal proceedings have not yet been completed, the Admissions Panel can suspend an applicant's entry to the programme pending the outcome of the case.

If an ongoing health issue is under review the Admissions Panel, on advice from the Programme Leader, can suspend an applicant's entry to the programme pending the outcome/management of treatment.

If there is a previous or ongoing issue with regard to whether any child/children in an applicant's care (or household in which they live/lived) have been placed upon a child protection register, been subject to a child protection plan or placed in care and the nature of these circumstances are of a serious nature the Admissions Panel can suspend an applicant's entry to the programme pending further investigation or depending on the circumstances withdraw/cancel an applicant's registration from the University.

The applicant has no right to present their views in person to the Panel (regardless of whether they have already commenced the programme). There is no right of appeal to the Admissions Panel.

3.2.3 Student Fitness to Train

Where required, health clearance must be provided by an Occupational Health Professional, who will decide whether the individual is fit to train. The Occupational Health Unit will notify the Programme leader, who will discuss with the student whether the health issues are sufficient to result in the withdrawal or suspension of an offer, placement/ work experience or cancellation of registration from the programme.

Fitness to train clearance may be withdrawn if a student's health status changes. Examples of this could be:

- Emerging or deteriorating mental health problems
- Serious illness or injury
- Failure to attend follow up appointment's with OH physician or failure to comply with medical advice advised by OH physician (attend NHS specialty appointment)

Students (whose role requires them to have health clearance) are required to complete an annual self-declaration form at the beginning of each academic year, or on return to study after an interruption.

Students experiencing a change to their health during their studies must inform the Programme Leader. If required, the Programme Leader should refer the student to Student Occupational Health.

If the OH Physician withdraws the Fit to Train Certificate the following should happen:

- The OH Physician will explain to the student why fitness to train has been withdrawn.
- The OH Physician will give advice to the student on what action they should take to get treatment for their health.
- Follow up appointment(s) in OH will be arranged for the student to be supported & reviewed during / after treatment.
- The withdrawal of fitness to train may be temporary whilst the student receives treatment.
- The OH staff will inform the program Lead for the affected student of withdrawal of fitness to train or return of fit to train status of a student

On advice from the Student Occupational Health Unit/OH Physician the Programme Leader, if appropriate, can recommend the student take an interruption of study until such time they are well enough to resume their studies or be withdrawn from the programme.

3.2.4 Offences committed during a programme requiring vetting

Students (whose role requires them to be vetted) are also required to complete an annual self-declaration at the beginning of each academic year or on return to study after an interruption.

If Students declare any changes to their criminal history or if a Student is arrested, cautioned or charged with an offence during their studies they must inform their Programme Leader immediately and the case will be referred to the Admissions Panel. A written statement must be submitted by the Student to the Admissions Panel. The Student will also be asked to make an appointment with the programme leader to complete a Declaration of Changes to Good Conduct Reflective Account.

Failure to declare an offence will automatically result in the Admissions Panel referring the case to a Fitness for Professional Practice Panel.

The University has a legal duty to refer individuals (whose role involves regulated activity relating to children and / or adults) to the DBS:

- a. who have been removed from their regulated activity role (or would have been removed if they had not left, resigned, retired or been made redundant);
- b. who have engaged in 'relevant conduct';
- c. whose activity satisfies the 'harm test';
- d. who have received a caution or conviction for a 'relevant offence'.

Students who experience a change of circumstances with regard to having any child/children in their care (or the household in which they live/lived) place upon a child protection register, are subject to a child protection plan or placed in care must declare this to their programme leader / personal tutor.

Dependent upon circumstances the Fitness to Practise Procedure may be invoked and failure to declare a change in circumstances will automatically result in the student having their case referred to a Fitness for Professional Practise Panel.

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.

If staff, in the course of their work at the University, become aware of a safeguarding issue, this **must** be treated as an absolute priority over other work considerations.

3.4.1 Recognising Emergency Situations

Deciding whether a situation is an emergency is a matter of personal judgment, but someone who is expressing a concern about the immediate safety of themselves or others, or a threat to life of any person, would warrant contacting the emergency services.

Action should be taken by contacting the Police on 999. The Security team should be contacted via their 24/7 line 0161 295 3333. A Designated Safeguarding Officer, or the Principal Safeguarding Officer should be notified as soon as possible. A list of Designated Safeguarding Officers can be found via the following link:

<https://salford.ac.uk/safeguarding>

3.4.2 Dealing with Disclosures

A disclosure needs to be handled sensitively. The following suggestions may be helpful:

- Listen to the person making the disclosure. Stay professional and respond sensitively, without expressing an opinion or imposing personal values.
- Do not ask invasive questions. These may make the person feel uncomfortable and prevent them from telling the full story.
- Gently encourage them, giving them time without pressurising.
- Reassure them that they have done the right thing by disclosing.
- Do not promise to keep the disclosure secret.
- Seek the assistance of a Designated Safeguarding Officer as soon as possible.

3.5 Dealing with concerns about radicalisation and extremism

The duty to safeguard children, young people and vulnerable adults from harm extends to protecting them from involvement with groups that set out to radicalise individuals.

Section 26 of the Counter Terrorism and Security Act 2015 places a duty on Higher Education providers to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty.

Factors which are considered when determining whether an individual may be vulnerable to involvement with terrorism are:

- Engagement with an extremist group, cause or ideology;
- Intent to cause harm;
- Capability to cause harm.

Changes in behaviour, regular appearance or dress may indicate a concern. However, there are many reasons for these changes which do not indicate a concern. This is why a **safeguarding** approach should be adopted which enables the University to identify an individual's needs and vulnerabilities.

The University has excellent student and staff support services and counselling provisions. These in-house procedures will always be utilised in the first instance when responding to perceived vulnerabilities.

If you are worried about an individual, you can discuss your concerns with a Designated Safeguarding Officer. Following this conversation, you should contact the Prevent Task Group

(safeguarding@salford.ac.uk) (chaired by the University Counsel) who will refer to Salford Channel if appropriate.

In accordance with our duties as a Higher Education Provider, the University of Salford seeks to embed British Values within our institution. For more information, please see our Statement on British Values (Annex. C).

3.6 Reporting Procedures

Safeguarding is **everyone's** responsibility, and a safeguarding concern must take **absolute priority** above all other workloads.

3.6.1 Procedure

Where a member of staff has a safeguarding concern or has witnessed an incident which gives them a cause for concern, they should immediately contact a Designated Safeguarding Officer. The responsibility for handling remains with the staff member dealing with the disclosure.

a) Managing an immediate risk of harm

If there is an immediate risk of harm to a student or member of staff, the staff concerned must try to mitigate this risk by calling the emergency services (999) and the University Security team (0161 295 3333).

b) Managing disclosures to a member of staff

Where a staff member has received a disclosure or has witnessed an incident that doesn't require emergency de-escalation, they should contact a Designated Safeguarding Officer immediately. The DSO may advise the member of staff to make further contact with the student concerned, to discuss context to incident, any other relevant details and to obtain the consent of the individual concerned. This responsibility lies with the member of staff.

The DSO and staff member should work collaboratively to complete the Safeguarding Proforma (section 6.3. Attention should be paid to the Checklist for making a written statement. The DSO and staff member can then collectively decide whether a referral to Social Services is necessary. Where the safeguarding concerns relate to possible radicalization, the relevant DSO and staff member must discuss this matter further with the Prevent Task group (safeguarding@salford.ac.uk).

Informed consent should be obtained from the individual concerned before making the referral wherever possible. It is therefore expected that staff discuss their intentions to refer a safeguarding concern to an external agency and gain consent to do so.

However, there will be occasions where consent cannot be obtained, or it is not safe to discuss the intention to refer. Scenarios may include:

- Where the person making the referral believes that the individual is suffering, or is likely to suffer, significant harm;
- Where obtaining consent would put the individual at risk of significant harm;
- Where obtaining consent would put the person making the referral at risk of harm;
- Where obtaining consent could lead to a loss of evidence, such as forced marriage/ honour based violence etc.

Where consent has been overridden, the reasons should be clearly documented in the safeguarding proforma.

Where there is a significant risk of harm, an external referral **must** be made within 7 hours of first receiving the disclosure.

c) Review/ Debrief

Following any safeguarding incidents or disclosures the DSO, in conjunction with the Safeguarding Officer, should review the situation to determine whether any further adjustments to policy or process should be made, and to help mitigate further safeguarding issues. Reviews should ideally take place within two weeks following an incident.

d) Supporting a student

After the incident, ongoing support should be offered to the individual making the disclosure. askUS can provide Counselling and Wellbeing support for a student, alongside support for housing, money and legal issues. They should be reminded of the availability of this support and how to access it.

3.9 Getting support

Dealing with children, young people and vulnerable adult safeguarding can be upsetting and it is perfectly normal to feel angry, sad or overwhelmed.

Staff are encouraged to discuss their needs with their line managers, however you should be mindful of confidentiality.

Staff can access counselling through the Employee Assistance Programme (EAP) by the free, confidential telephone support helpline, accessible 24 hours a day: 0808 168 2143. Via this service you can access face-to-face counselling within 5 days.

For in-house counselling, you can self-refer by emailing staffcounselling@salford.ac.uk.

3.10 Freedom of Speech

The University operates a Freedom of Speech Policy intended to ensure compliance with legal requirements, including Prevent duty guidelines, whilst protecting its duty to ensure freedom of speech for staff, students and visiting speakers on the University's premises.

3.11 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 Practise/ Fitness to Study, 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, Office for Students and any relevant professional body.

3.12 Annual review

The Safeguarding Officer will arrange and chair annual safeguarding review meetings with the DSOs, to ensure this safeguarding policy and supporting procedures remain effective and continue to operate in accordance with any new legislation.

4. 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 concerns around radicalisation) as per the Reporting Process 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. 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 Practice Procedure
- Fitness to Study Procedure
- Summer School Safeguarding Policy

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>
- Safeguarding <http://beta.salford.ac.uk/safeguarding>

D. Salford Social Services Child and Adult Safeguarding Pages

- Salford Adult Social Care: <https://www.salford.gov.uk/health-and-social-care/>
- Salford Safeguarding Children Board: <https://www.partnersinsalford.org/sscb/>
- The Bridge Partnership: <https://www.salford.gov.uk/children-and-families/safeguarding-children/worried-about-a-child/>

6. Reporting a Concern

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 and Young Adults (under 18 years old)

Salford City Council and their partners operate a multi-agency hub called the **Bridge Partnership** that screen all contacts concerning the welfare or safety of a child, young person or vulnerable adult. Please note facts using the safeguarding recording proforma (appendix B) and refer to the safeguarding recording procedures (appendix A).

The Bridge can be contacted via 0161 603 4500 between 8.30am and 4.30pm. If you need to speak to somebody about your referral of concern outside these hours, please call the Emergency Duty Team on 0161 794 8888.

An online referral for The Bridge is available via <https://www.salford.gov.uk/children-and-families/safeguarding-children/worried-about-a-child/>

Safeguarding referrals need to be made to the equivalent service within the local authority for the attendee's home address. If the individual lives outside of the Salford area, please refer to equivalent local service. The Safeguarding Officer within the University can advise further as necessary.

If the individual works with children

If your concern is regarding an adult who works with children in either a paid or a voluntary capacity, please contact the Local Authority Designated Officer for further advice on 0161 603 4350.

Adults (over 18 years old)

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

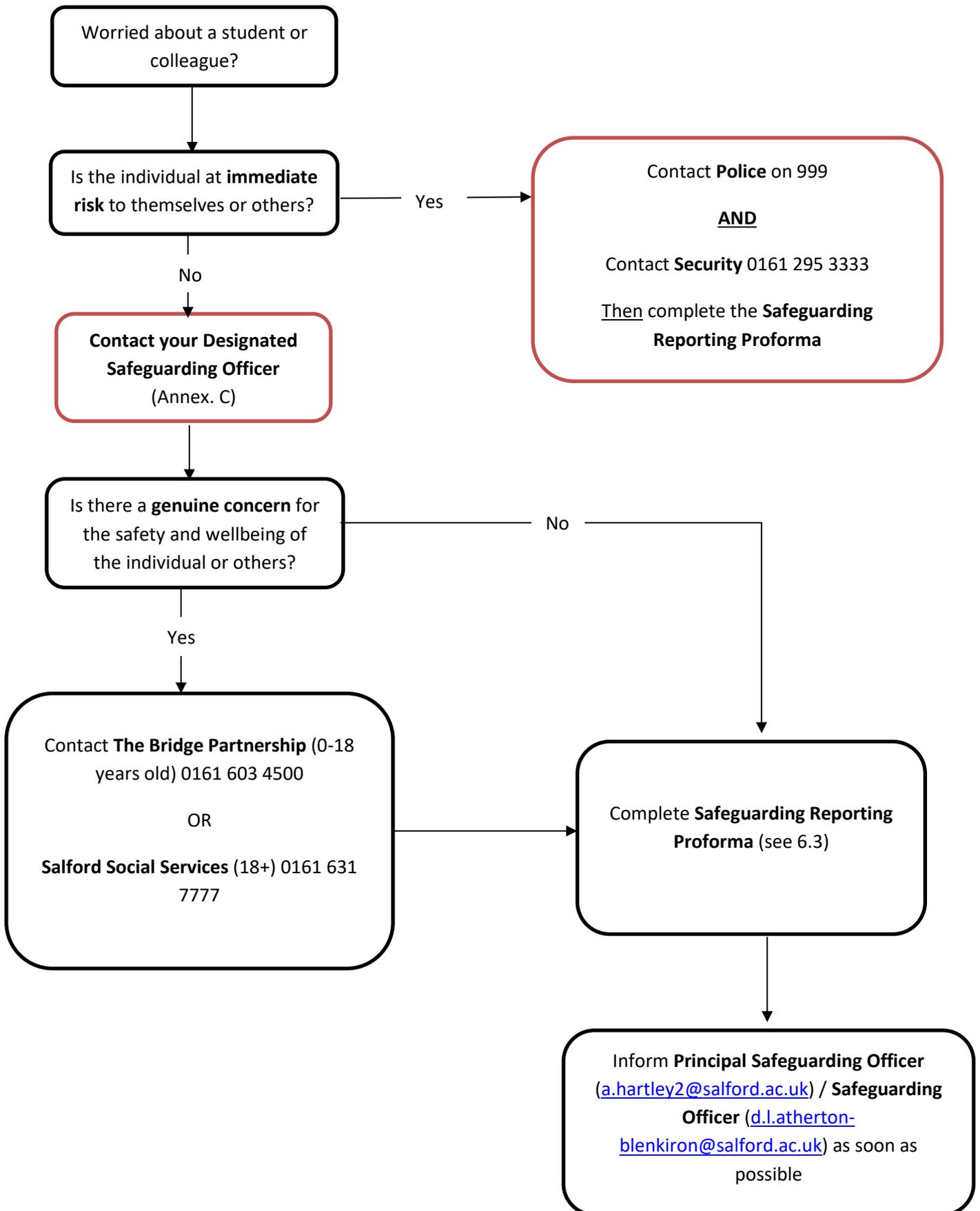
<http://www.salford.gov.uk/health-and-social-care/safeguarding-adults/>

Social Services can be contacted between 8.30am and 4.30pm. If you need to speak to someone outside these hours, please call the Emergency Duty Team on 0161 794 8888.

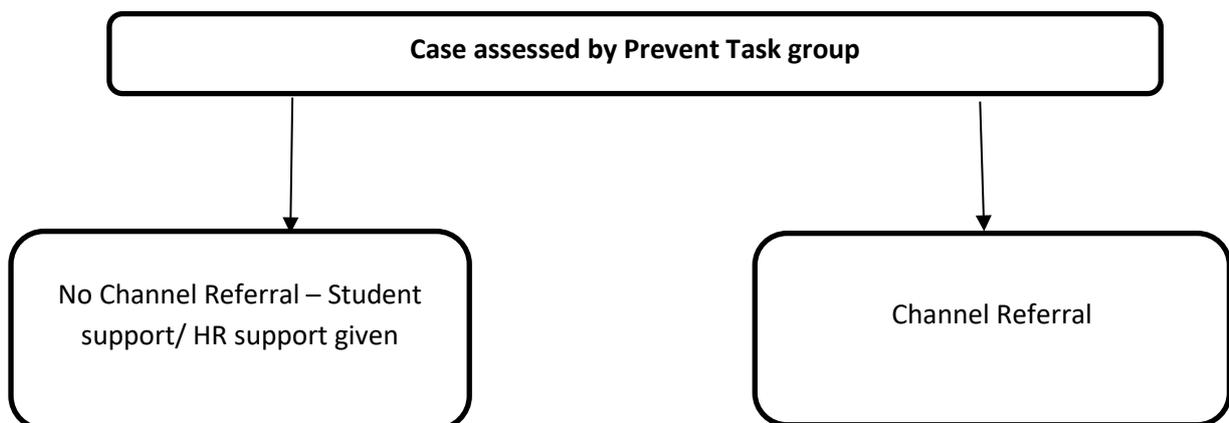
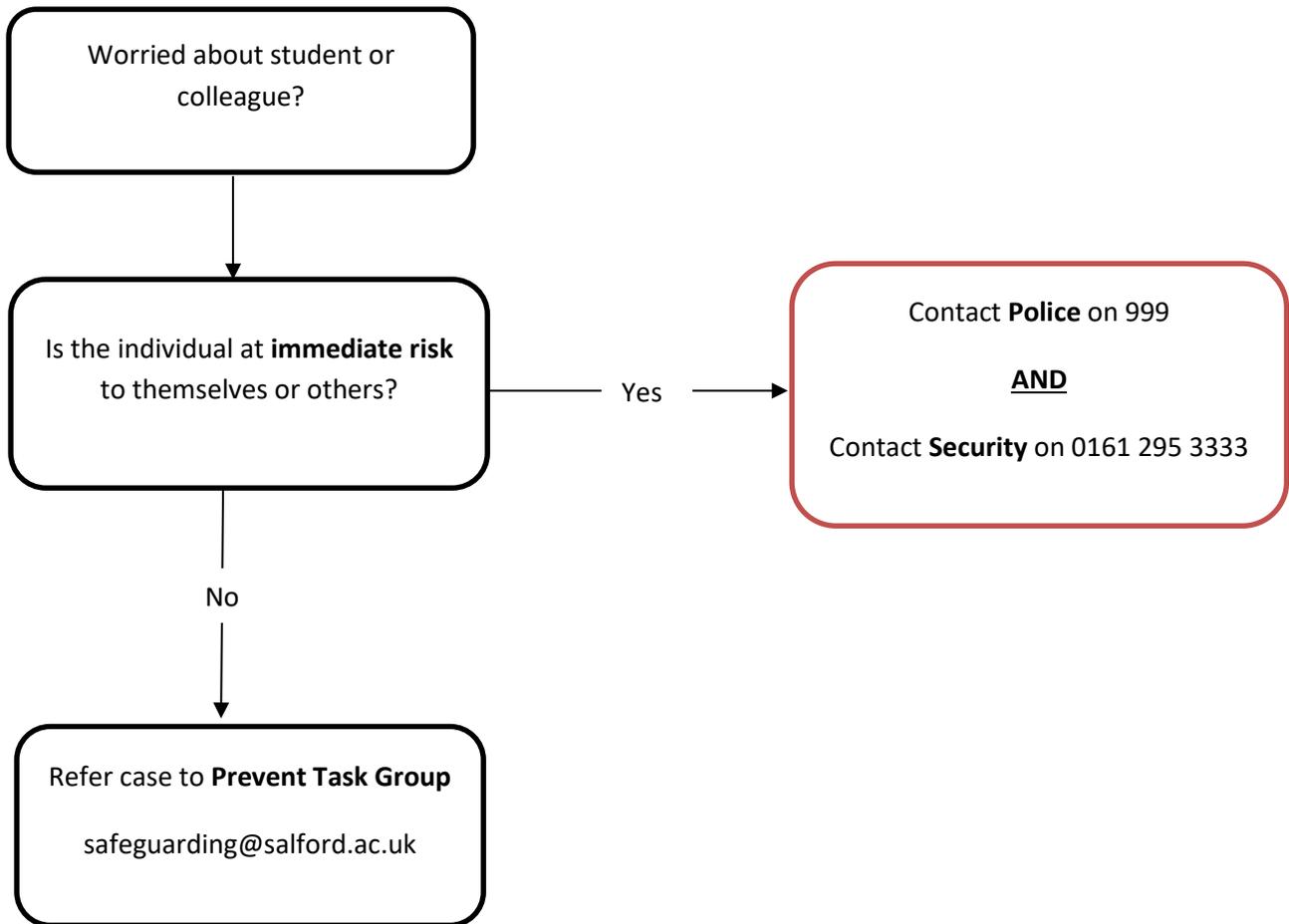
For Prevent Concerns

Contact the Prevent Task Group via safeguarding@salford.ac.uk

6.1 Reporting Safeguarding Concerns



6.2 Reporting Prevent Concerns



6.3 Safeguarding Reporting Proforma

This form is to be completed under the guidance of a Designated Safeguarding Officer

Your Name:

Your Role:

Designated Safeguarding Officer Name and Contact:

Date and Time of Report:

Other Colleagues Involved:

Name and Address of Student:

Student Number:

Course Studied:

Statement of Incident

Please include date, time, location and description of the incident

Is there an immediate risk to the individual or others? Y/N

Action Taken

Please include names and contact of person(s)/ agency/ service(s) the referral has been made. If a referral is not necessary, please state reasons below.

Context to Incident

Please include any other relevant detail

Signature

Please email this form to safeguarding@salford.ac.uk

6.4 Checklist for staff completing proforma / making a written statement

Your Designated Safeguarding Officer will help you complete the Safeguarding Reporting Proforma.

As part of a Safeguarding Referral to Social Services or the Police you may also 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 handwriting where possible and make the statement as soon after the event as possible.
3	Write in the first person 'I saw.....'
4	Number the pages if more than one i.e. 1 of 3; 2 of 3; 3 of 3 etc.
5	A statement should not express opinions, especially about matters outside your expertise. Keep to the facts.
6	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.
7	Clearly state your name, designation, place of work, your duties and responsibilities.
8	Give accurate details of time, date and place of the incident.
9	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.
10	Set out the sequence of events in a time ordered way, saying only what your involvement was.
11	State clearly what you saw happen. If this was reported to you say so and record what was told to you.
12	Where a conversation took place record what was said, by whom, and what questions were asked, as far as you can remember.
13	If you cannot be sure about a certain aspect of the incident then say so.
14	If you acted with someone else state 'and I agreed that I should do this with....' (Give their name, designation etc.)
15	If other documents (e.g. user records, accident report forms, day books etc.) are relevant, refer to them in your statement.
16	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.
17	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.
18	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.
19	Say who you contacted at the time, your line manager, DSO, LADO, Social Worker etc.
20	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. Send any updates to the Safeguarding Officer/ Principal Safeguarding Officer.
21	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).

Appendices

Annex. A: Definitions and Interpretations

Annex B: Code of Practice when dealing with Children or Vulnerable Adults

Annex C: Statement on British Values

Annex A.

Definitions and Interpretations

Abuse – Abuse is a violation of a person’s human and civil rights by another. There is no exhaustive list of what may constitute abuse or exploitation, but includes

- A single or repeated act of any scale which causes harm;
- Neglect or omission on part of someone with caring responsibilities

Types of Abuse

Abuse (Physical) – Includes hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions, or otherwise causing physical harm.

Abuse (Bullying, Harassment or Discrimination) – includes direct or indirect discrimination on the grounds of race, sex, sexual orientation, transgender status, religion or disability.

Abuse (Emotional) – Includes intimidation and threats, continuous criticism, controlling behavior, emotional blackmail

Abuse (Sexual) – Sexual abuse can include both physical and non-physical components. It can involve rape, inappropriate touching, forcing or grooming someone to be

Abuse (Economic or Financial) – Includes controlling money and budgets, preventing someone from getting a job, running up debts in that person’s name.

Abuse (Institutional) – Maltreatment of a person brought about by poor or inadequate care or support.

Abuse (Internet/ Electronic) - 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.

Child Sexual Exploitation – A type of sexual abuse against children. This occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity a) in exchange for something the victim needs or wants, and/or b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. This does not always involve physical contact; it can occur through the use of technology³.

Criminal Exploitation – This occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a person. The victim may have been criminally exploited

³ Department for Education, 2017. Child sexual exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf [Last accessed 7/5/19]

even if the activity appears consensual. It can involve force and/ or enticement-based methods of compliance and is often accompanied by violence or threats of violence⁴.

Domestic Abuse/ Violence – An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behavior, including sexual violence by a partner or ex-partner.

Female Genital Mutilation (FGM) – A procedure where a female’s genitals are deliberately cut, injured or changed without medical reason. This can include partial or total removal of external female genitalia. It is also known as ‘female circumcision’, ‘cutting’ or by local terms such as *sunna*, *guniin*, *halalays*, *tahur*, *megrez*, *khitan* and others.

Forced Marriage – A marriage where one or both parties do not consent to the marriage, with pressure or abuse being used.

Honour Based Violence – A form of domestic abuse where women are often punished for bringing ‘shame’ on a family. Honour based violence can exist in any culture or community, and males can also be victims.

Human Trafficking - Involves the recruitment, harbouring or transporting individuals into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. This can include forced prostitution, forced labour, forced begging, forced criminality and forced marriage.

Modern/ Domestic Slavery – The illegal exploitation of people for private or commercial gain. Individuals are trapped in servitude, which they were deceived or coerced into, and are unable to leave.

Other Definitions

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

Disclosure and Barring Service (DBS) – A statutory body helping employers make safer recruitment decisions and prevent unsuitable people from working with children and other vulnerable groups. The DBS does this through criminal record checking and maintaining two barred lists where information shows individuals pose a risk of harm to children or vulnerable adults.

Extremism – the UK government defines extremism as the vocal or active opposition to fundamental British values, democracy, the rule of law, individual liberty and mutual tolerance of different religions and beliefs. The Counter Terrorism and Security Act 2015 also includes calls for the death of members of the armed forces, domestically or overseas, in the definition of extremism.

Prevent – Prevent is the duty in the Counter Terrorism and Security Act 2015 on specified authorities, including Higher and Further Education institutions to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation – Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism – Defined as an action which endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing political, religious or ideological cause (S.1 Terrorism Act 2000).

⁴ Home Office , 2018. Criminal Exploitation of children and vulnerable adults: County Lines guidance. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCCountyLinesGuidanceSept2018.pdf [Last accessed 7/5/19]

Young Person/ Young People – a person or persons who are aged 16-17, but for the purpose of this policy, will come under the definition of a child

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.

Identifying warning signs

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.
- Constantly being in receipt of new possessions which is out of character.

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 (Counselling & Wellbeing team, askUS) and staff (HR Advice and Occupational Health) within the University

Annex. B.

Code of Practice 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 you follow the Salford Behaviours
- ✓ 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.

Annex. C.

Statement on British Values

The Department for Education have reinforced the need 'to create and enforce a clear and rigorous expectation on all schools to promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs'.

Salford University is committed to upholding and actively promoting these values

RESPECT AND TOLERANCE

- Our learners will develop an understanding of respect and tolerance through:
- Our chaplaincy, offering multi-faith events throughout the calendar year, and a purpose built multi-faith centre where students of all faiths and or no faith can equally find space to socialise, pray and reflect.
- Salford Pride, developing understanding and respect for our LGBTQ+ community
- Volunteering, work experience and mentoring programmes
- University Bullying and Harassment Policies
- We have a dedicated Student Inclusion and Diversity Manager, and broader student advice team in askUs. All staff are also required to complete training on diversity and inclusion
- USSU and askUs are third party hate crime reporting centres
- Our diverse curriculum

INDIVIDUAL LIBERTY

- We seek to protect our learner's individual liberty through: -
- University and USSU Safeguarding Policies and Procedures
- Our curriculum
- Access to University support, information and guidance through askUs and USSU
- Counselling and Welfare team and access to a comprehensive suite of mental health services

DEMOCRACY

- Our learners will develop an understanding of democracy through: -
- Our Students' Union, with the opportunity to stand and vote in Sabbatical elections
- Students' Union General Meetings (UGMs)
- A broad range of optional events and seminars, where students are encouraged to voice and reflect on their own ideas
- Being invited to participate in student surveys

RULE OF LAW

- Our learners will develop a respect for the rule of law through:
- Student Code of Conduct
- Disciplinary procedures and IT protocols
- Lecture and seminar rules