Safeguarding Policy

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1. Purpose

1.1 This policy is intended to ensure that all children, young people, adults at risk and those who work with them are safe and supported in our University. The University is mindful of its duty of care and legal obligations, such as those it owes under the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

2. Definition

2.1 For the purpose of this policy, safeguarding means protecting the health, wellbeing and human rights of children, young people and adults at risk, enabling them to live safely, free from abuse and neglect. This includes:

- an anticipatory element to prevent harm
- an oversight element to protect those in the course of activities
- a quality assurance element to ensure protection standards are met; and
- a reporting element to ensure swift and effective action in the event that concerns are raised.

Further definitions are found in Appendix 1.

3. Scope

3.1 This Policy applies to all members of University staff, University Council members, third party employees, associates, students across all programmes of study including apprenticeships and volunteers. However, it is specifically aimed at staff, students, and volunteers who encounter the following groups through teaching, research, professional services, placements and outreach activities:

1. Children (i.e. those aged under 16),
2. Young people (i.e. those aged 16 to 18)
3. Adults at risk of harm and
4. Adults in a vulnerable situation.

Adults in a vulnerable situation are referred to within this policy, in the understanding that 'safeguarding' in a wider sense involves supporting individuals who may not be identified as a child or adult at risk, but who may still require immediate support to enable them to stay safe.

See page Appendix 1 page 9 for further definitions and examples

The people to whom this Policy applies are described collectively in the rest of this Policy as Members of the University Community.

3.2 This policy should be consulted in conjunction with the University's Policy on the Admission and support of students under the age of 18 Policy

3.3 This policy does not cover:

1. 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
2. A general duty of care for visitors on University premises. This is referenced in the University Health & Safety Policy and subsidiary documents.

4. Policy Statements

4.1 The University wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children, young people and adults at risk when in contact with University students and staff (whether acting in a paid or unpaid capacity). However ultimate responsibility for under 18's will continue to rest with parents and guardians.

4.2 While it is impossible to ensure that a child, young person or adult at risk of harm/in a vulnerable situation would never come to any harm, the adoption of this policy and associated guidance aims to facilitate the management of the risk associated with the duty to protect such individuals.

4.3 This policy does not seek to discourage working with vulnerable groups but rather to support the safe delivery of these activities.

4.4 In order to achieve its aims in this regard the University will focus on six key areas:

a. Risk Assessment

b. Recruitment, selection and employment procedures

c. Dealing with suspicions and allegations of abuse

d. Training and Support

e. Under 18s

f. Sexual Violence and Harassment

5. Prevent: Dealing with concerns about radicalisation and extremism

5.1 The duty to safeguard children, young people and adults at risk of 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.

5.2 The University of Salford fulfils its responsibilities to protect vulnerable people from radicalisation and extremism as part of the wider Safeguarding duty. More information about this is available on our webpages about The Prevent Duty

5.3 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.

5.4 The Department for Education encourages universities to promote fundamental British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The University's commitment to this is contained in our Statement on British Values (see appendix H)

6. The Key Areas of the University's approach: Risk Assessment

6.1 All staff that intend to, or may be put in the position of, working with children, young people or adults in a vulnerable situation should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

6.2 Staff who are contracting external parties to work on the University's behalf or allowing or enabling external parties to use University estate or facilities, should also ensure that where those bookings include children or adults at risk of harm, those external parties are familiar with the University's Safeguarding policy procedure and guidance.

6.3 A designated individual should complete a risk assessment before any new or changed programme, event, visit or any other activity involving children, young people or adults at risk of harm, or before admitting or employing an under-18.

6.4 All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

7. The Key Areas of the University's approach: Recruitment, selection and employment procedures

7.1 The University will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children, young people and adults in at risk from harm.

7.2 Where a risk assessment has identified that students or staff are likely to have regular contact with or encounter children, young people or adults at risk of harm (which might include regular processing of information), appropriate checks into their eligibility will be required.

7.3 Where staff roles are identified as involving regulated activities, HR will coordinate the appropriate level of screening for individuals in those positions.

- For roles evaluated as grade 6 and below, this will include a DBS check where required
- For roles evaluated as grade 7 and above, this will include 2 references and a DBS check where required

Failure to satisfy the necessary screening requirements may result in a withdrawal of offer or

termination of employment.

7.4 The University is registered with the Disclosure and Barring Service ("DBS") and will ensure that any member of staff or any student who will have substantial one-to-one contact with children, young people or adults at risk of harm, and their role falls within the eligibility criteria, will be checked for relevant criminal convictions. This process is managed through academic schools.

8. The Key Areas of the University's approach: Dealing with suspicions or allegations of abuse

8.1 Concerns for the safety and well-being of children, young people and adults at risk could arise in a variety of ways and in a range of different settings. For example:

- a child may report or display signs of abuse;
- someone may hint that a child is at risk or that a colleague is an abuser;
- an individual may witness or hear about abuse of an adult at risk of harm.

It is essential to act quickly and professionally in all cases of suspected abuse.

8.2 Any allegation by a child, young person or adult at risk of harm against a member of staff, another student, someone external to the university or a volunteer should be reported immediately to the relevant designated individual who has responsibility under this policy (See Annex C). Where a member of the university community has a suspicion that a child or adult at risk of harm may be experiencing harm or abuse, these suspicions should be dealt with using the same approach. In dealing with any such allegation or suspicion, the University has a duty of care both to the child, young person or adult at risk of harm concerned and to the member of staff, student or volunteer against whom the allegation is made.

8.3 Staff and students on work-based placement learning in clinical settings, health care and social care may come into regular contact with children and adults at risk. Students on work-based placement learning are encouraged to refer to 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 C).

8.4 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.

8.5 Where activities take place on campus that involve children and young people from other institutions (e.g. summer schools/campus visits) the staff organisation and managing these events are expected to familiarise themselves with the Safeguarding Policy and any other relevant policies and procedures (Summer School Safeguarding Policy).

8.6 Where there is an allegation against a member of university staff that brings into question their conduct, checks will be made by HR to determine whether that individual undertakes regulated activity with under 18-year-olds, as part of the investigation process. In cases where it is established that the staff member does undertake regulated activity with under 18-year-olds, the Designated and Deputy Designated Safeguarding Leads will be

informed about the case and depending on the outcome may be required to inform the Local Authority Designated Officer (LADO) and/or DBS.

8.7 Where a safeguarding allegation is made against a colleague, checks will be made by HR to determine whether that individual undertakes regulated activity with under 18-year-olds or adults at risk of harm, or whether they teach on health/or social care related courses, as part of the investigation process. In cases where it is established that the staff member does satisfy either (or both) criteria, the Designated and Deputy Designated Safeguarding Leads will be informed about the case and will seek advice from the Local Authority Designated Officer (LADO) or the appropriate Adult Safeguarding Team on possible action needed. This process will also take place in instances of sexual misconduct, even if the alleged victim is not a child or adult at risk of harm, as the University recognises the potential of transferable risk in cases of sexual misconduct.

8.8 Where the University becomes aware of a safeguarding concern relating to a student on a programme of study that includes placements with children or adults at risk of harm, the AD(SE), Deputy Designated Safeguarding Lead and Designated Safeguarding Officer linked to the school, will work with the Local Authority Designated Officer (LADO) to ensure appropriate information is shared, risk assessments are completed and the appropriate action is taken to ensure safety of patients/service users.

9. The Key Areas of the University's approach: Training and support

9.1 The University will provide appropriate support information and training on this policy. This will be delivered through the University's Safeguarding structure as well as the staff-facing resources on the Safeguarding Hub.[1]

10. The Key Areas of the University's approach: Under 18s

10.1 Risk assessments will be completed for all students under the age of 18 who are studying with the University.

Please see the Admission and Support of Students under 18 years of age Policy for a full description of how the University manages the admission and support of students under the age of 18.

11. The Key Areas of the University's approach: Sexual violence and harassment

11.1 The University employs a Sexual Violence Liaison Officer/Domestic Abuse Caseworker to support with reports of sexual violence and harassment from students. Such cases are assessed on a case by case basis, a process which includes the completion of a risk assessment for reporting students.

11.2 Where a case involves a student on student allegation, the University may take action through the Student Misconduct Procedure. These cases will be assessed on a case by case basis, through the Student Case Management Group who will appoint an investigator from a pool of colleagues who have received specialist training in this area. (see related

[1] This is a Sharepoint link and is only accessible to internal users at the University.

documentation)

11.3 Where a case involves an allegation by a student against another student, both students will be contacted and offered wellbeing/welfare support.

11.4 Allegations of sexual violence/harassment against a university colleague will be managed through Human Resources (see 8.7). In cases where such reports involve a colleague who is identified as having access to students who are under the age of 18 or adults at risk, Human Resources will notify the Designated Safeguarding Lead.

11.5 In cases where a colleague is alleged to have committed sexual violence/harassment and leaves the organisation before an investigation is complete, the investigation will continue in their absence and The Designated Safeguarding Lead will be informed of the outcome.

12. What happens when the policy is not followed

12.1 Where a safeguarding concern has been raised and identified as requiring Social Services support (with the support of a DSO), 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.

12.2 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.

13. Related Documentation

Recruitment Code of Practice
Personal Relationships Policy[2]
Disciplinary Policy – Employees
Health & Safety Policy Health and Safety Policy[3]
Risk Assessment Code of Practice and Form
Limitations on bringing Children onto University premises

Admission and support of students under the age of 18 Policy
Work Based and Placement Learning Policy
Summer School Safeguarding Policy

Policies available via University Student Facing Procedures

Applicant and Student Criminal Convictions
Fitness for Practice Procedure
Fitness to study Policy
Safeguarding Policy
Student Misconduct Procedure
Student Support Policy

[2] This is a Sharepoint link and is only accessible to internal users at the University.
[3] This is a Sharepoint link and is only accessible to internal users at the University.

University advice pages

Student Wellbeing and Counselling
Staff Occupational Health[4]
University approach to Prevent
Safeguarding

The following documents are designed to support colleagues specifically in carrying out their safeguarding duties.

Appendix 1: Definitions and Interpretations

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[4] This is a Sharepoint link and is only accessible to internal users at the University.

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Abuse (Definition and explanation)

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. Abuse can:

- Consist of a single act or repeated acts or multiple 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.

Abuse (Types)

Physical

Includes hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions, or otherwise causing physical harm.

Bullying, Harassment or Discrimination

Includes direct or indirect discrimination on the grounds of race, sex, sexual orientation, transgender status, religion or disability.

Emotional

Includes intimidation and threats, continuous criticism, controlling behaviour, emotional blackmail

Sexual

Sexual abuse can include both physical and non-physical components. It can involve rape, inappropriate touching, forcing or grooming someone to take part in sexual activities or to touch or take part in sexual activities with someone else.

Economic or Financial

Includes controlling money and budgets, preventing someone from getting a job, running up debts in that person's name.

Institutional

Maltreatment of a person brought about by poor or inadequate care or support.

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.

Abuse (Examples)

Child Sexual Exploitation

A form 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 technology[5]

Criminal Exploitation

This occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or adult in a vulnerable situation. The victim may have been criminally exploited even if the activity appears consensual. Age is most often a factor in the imbalance of power, but other factors can also create vulnerability to exploitation including gender, cognitive ability, physical strength, status, and access to economic or other resources. Criminal exploitation can involve force and/ or enticement-based methods of compliance and is often accompanied by violence or threats of violence[6].

Domestic Abuse/ Violence

An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, 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.

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[5] 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 23/07/20)]

[6] Home Office , 2018. Criminal Exploitation of children and adults at risk: County Lines guidance. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLines GuidanceSept2018.pdf [Last accessed 24/07/20)

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.

Abuse (Possible Signs)

- 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

Adults at Risk of Harm

"...a **vulnerable adult**, or an **adult at risk**, is a person over the age of 18 who is unable to take care of themselves. It can also refer to one who is unable to protect themselves against significant harm or exploitation. It is important to note that this does not necessarily mean that the adult lacks competency. **To be classed as vulnerable, the adult's circumstances must be unable to be altered or improved by the adult's own individual actions without direct assistance"**

NHS England Guide to Safeguarding Adults

External Agencies such as Social Services and charities may have their own definitions of an adult at risk.

It is important to remember that adults, including adults at risk of harm and adults in a vulnerable situation, have the right to self-determination. This can include making decisions which others may suspect will be harmful to their interests. It will not usually be legal to override this. The most usual exceptions would be: if they lack capacity; if the risk is immediate and serious; or if a child is being put at risk by the decision.

Adults in a Vulnerable Situation

When considering whether a person is vulnerable or at risk, it is relevant to consider all their circumstances. Someone who would not otherwise be considered at risk of harm may be considered as vulnerable when all the elements of their situation are taken into consideration. Example of relevant factors may 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.
- Adults experiencing domestic abuse

British Values

The government has specified a set of values, named 'British Values' which universities are expected to promote. These values are: (i) democracy, (ii) the rule of law, (iii) individual liberty, and (iv) mutual respect and tolerance of those with different faiths and beliefs. The University's statement on commitment to British Values and how we embed these can be found on our webpages about The Prevent Duty.

Child/Children

A person or persons under the age of 18 years.

Disclosure and Barring Service (DBS)

A statutory body helping employers make safer recruitment decisions and prevent unsuitable people from working with children and other at risk 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 adults at risk.

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

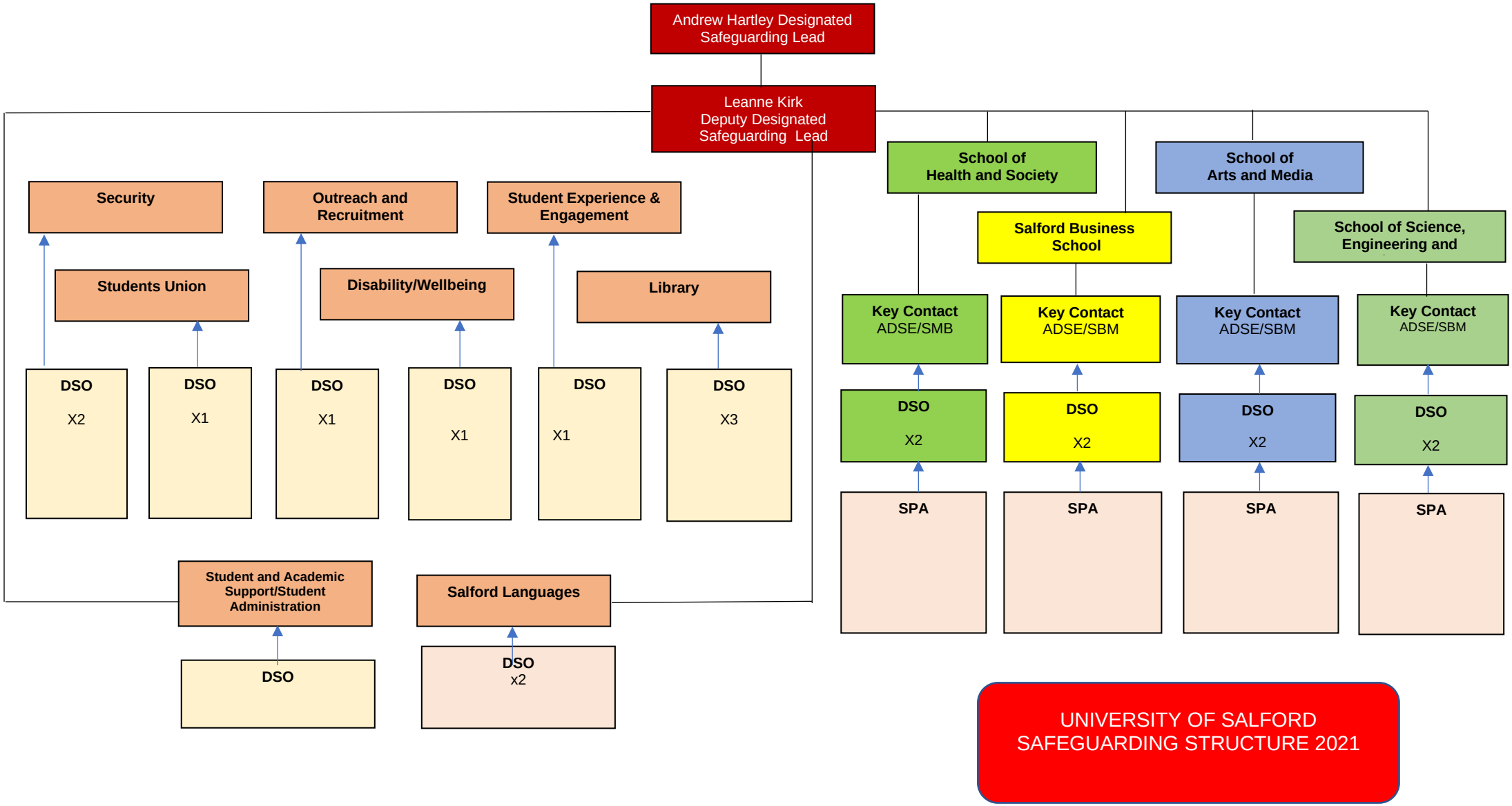
Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Safeguarding
There are different definitions of safeguarding which are used by different agencies in different contexts, for example, Schools, FE Colleges, Universities, Social work settings.

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).

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

Annex A University Safeguarding Structure



Annex B

Safeguarding Governance

Safeguarding Committee: Consists Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and the Head of Student Support. Meetings are held 3 times per year to review processes, procedures and policy, to ensure they remain effective and continue to operate in accordance with any new legislation.

Safeguarding Network: All DSO's are encouraged to attend these events which are once a year. These events allow DSO's to access CPD, share good practice and discuss and concerns they have with their role and the University processes, which can be fed back into the Committee/Working Group.

Prevent Task Group: Consists of DSL, Deputy DSL, Head of Student Support, Head of Security, Deputy Head of Security, Programme Leader for BSC Professional Policing, Equality and Diversity Manager, AD(SE) Arts and Media. Meetings are held every 2-3 months to update on Prevent related developments, discuss cases and review processes, procedures and policy.

Prevent Consultation Group: Informal group drawn from colleagues and students across the university on an occasional basis to discuss wider issues relating to Prevent.

Annex C

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.

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

Designated Safeguarding Lead
Responsibility: Accountable for all Safeguarding concerns at the University, and responsible for overseeing the management of safeguarding issues within the University. Overall responsibility for ensuring Safeguarding Policy and Procedures are updated appropriately.
Named Person: Currently Director of Legal and Compliance

Deputy Designated Safeguarding Lead
Responsibilities: Operational responsibility for statutory (under 18's and adults at risk) Safeguarding and Prevent provision across 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 alongside Designated Safeguarding Lead
- To attend external meetings to represent safeguarding at the University
- To triage safeguarding concerns through the Universities report and support function
- To support DSO's with complex cases

Named Person: Currently Respect, Culture and Behaviours Manager

Designated Safeguarding Officers 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.
- 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
- Liaise with Human Resources to ensure appropriate DBS checks are taking place.
-

Named Persons: Student Experience Manager/Programme Manager (for Salford Languages see Learning and Teaching Manager)

Associate Dean Academic AD (SE) /School Business Manager (SBM)
- To work with Designated Safeguarding Officers to ensure appropriate risk assessments are carried out for relevant activities;
    - Assist in resolving issues which may arise within their schools, in the course of carrying out responsibilities for Safeguarding
-
- Ensure all staff compliance with this safeguarding policy as an **absolute priority**;

Human Resources:
- To manage allegations of misconduct against colleagues
- To inform the DSL and Deputy DSL of safeguarding allegations involving colleagues
- To manage Recruitment, Selection an Employment processes and procedures

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

Annex D

Guidelines on risk assessment in relation to safeguarding vulnerable groups

1) Admission and Support of Students under the age of 18

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. Staff who have contact with these students should ensure they are familiar with the University Safeguarding Policy and the Admission of Students under 18 years of age Policy

2) Academic research

As part of the governance of research and to ensure all research activities are conducted ethically, the University has developed Safeguarding guidance for researchers, research students and participants which can be found on the Academic Ethics pages on the Staff Hub.[7]

3) Other activities

Before organising or undertaking any activity which may involve staff or students (whether acting in a paid or unpaid capacity) working with members of a vulnerable group, a risk assessment should be conducted, part of which should cover safeguarding issues.

The type of activity where a risk assessment would be required would include (but is 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 projects
- Excursions, volunteering and other social activities or student societies.

The risk assessment should be conducted by the 'owning' School or Professional Service, together with any other University teams or external providers who may need time to contribute to the assessment.

[7] This is a Sharepoint link and is only accessible to internal users at the University.

There are no fixed rules on how a risk assessment should be carried out, although the following general principles should apply:

i. Incorporate the standard health and safety risk assessment

The Health and Safety Office has developed a Risk Assessment Code of Practice on risk assessment which is available from the at the Health & Safety document library on the staff Hub.[8] This is accompanied by a Risk Assessment form, which you may find useful and can adapt to your needs.

ii. Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups

This will enable you to identify potential risk situations such as occasions where a single adult is in the company of a lone child, or adult in a vulnerable situation and where there is little or no possibility of the activity being supervised or observed by others.

Think about the realities of the situation and reasonably foreseeable circumstances. For example even where two staff are present they will need comfort breaks and would have to seek help if an accident occurred which could leave one alone.

When carrying out the risk assessment, the terms 'frequently' and 'intensively' relate to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.

iii. Identify any potential risk areas and detail action to prevent the risk occurring

Once you have identified the risks you should work to mitigate or prevent them. You can minimise the risk either by preventing the situation from occurring at all (re-design the activity) or by taking steps to mitigate the risk (e.g. add extra safeguards).

You may impose multiple safeguards on an activity. For example if a member of staff is 1-1 with a student under 16 consider:

- Is there a way to prevent this?
- If it is unavoidable, another staff member should be informed the meeting is taking place
- And/or another staff member should attend
- And/or the meeting should take place in a public space or with the door of the room open (assuming the interior could then be observed by passers by)

iv. Identify any situations where a Disclosure and Barring Scheme (DBS) check might be required.

There may be situations where the risk cannot be fully mitigated with precautionary measures and in this case, it may be necessary for the person who will spend time with the child or vulnerable adult to be subject to a disclosure from the Disclosure and Barring Service (DBS).

You can use this questionnaire to find out whether a DBS check is needed.

As a reminder when completing the questionnaire, the term 'frequently' relates to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.

[8] This is a Sharepoint link and is only accessible to internal users at the University.

This would apply to staff or students where their normal duties fall within the definition of Regulated Activity or are listed in the Rehabilitation of Offenders Act (Exceptions) Order 1975 or the Police Act Regulations. The definition of "normal" in this instance is in accordance with the standard dictionary definition (or variations thereof), which is "usual, regular or typical". Therefore positions that have incidental/irregular contact with children or scenarios where an individual has incidental or indirect contact not related to a position of employment do not give rise to eligibility for DBS checks.

v. Record your findings

You should keep a copy of the risk assessment form on file for future reference or use and provide a copy to your Head of School or line manager. It is good practice to review your assessment from time to time at least annually but also if any circumstances are likely to have changed. You should initial and date the assessment when you review it.

Annex E

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.

Annex F

Code of Practice when dealing with Children or Adults at Risk

This advice relates to University work with **children**: anyone under 18 years of age **and** may be a student at the University; or **adult at risk**: 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. Must 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 adult at risk. 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 adults at risk.
- × 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

- × Sharing personal contact information with a student/s (phone number/social media/email)

Annex G

Safeguarding Guidance for providing Remote Learning

This staff guidance has been written in response to the increase in remote and blended learning that is taking place since the covid-19 pandemic. It is recognised that remote working, if not carried out appropriately can place staff and students at greater risk. Please ensure you follow the guidance below if you are planning any form of remote contact with students.

NB: All guidance is additional to any requirements identified through the risk assessment undertaken for all teaching of under-18 year olds. In the event of any conflict the requirements of the risk assessment for your programme take priority.

Before you start

1) Read the University Safeguarding Policy
2) If you have not already done so, complete the 'Inclusive, Cohesive and Safe HE Campuses' e-learning module within your compliance eLearning dashboard (if you cannot access this please speak to Human Resources.[9]

When planning teaching

3) Only use online platforms that have been approved by the University**. At present these are Blackboard, Collaborate and Microsoft Teams.**
4) If your syllabus contains content which is likely to be upsetting or disturbing, especially to students under the age of 18 who may not yet be equipped to handle it, this should be the subject of a risk assessment with appropriate mitigations in place to manage any risk.

General advice for teaching and communication with students

5) Ensure your privacy settings are set so that your personal information cannot be viewed by students
6) Ensure the time of any communication is appropriate. Contact of this nature should not take place out of 'normal hours' (these may differ across programmes)
7) Keep clear boundaries:
    a. Only use your university email to communicate with students.
    b. Do not communicate with or organise teaching sessions or one to ones with students using your personal social media accounts.
    c. Do not follow students or request them as friends on social media.
    d. Carefully consider any personal information you share with students; for your benefit and theirs
    e. As far as possible minimise appearances from members of your household

[9] This is a Sharepoint link and is only accessible to internal users at the University.

f. If working from home, blur your background or limit visibility of personal space
g. Ensure you follow University guidance around use of personal social media accounts

Specific guidance for managing one to ones:

8) Only use University approved platforms for these interventions. At present, the advice is to use Microsoft Teams for one to ones.
9) If you wish to record a one to one for any reason, then you must agree this with the student. You should seek advice from Staff Digital Skills before recording any one to one session with students. They can advise you on the safest and most efficient way to do this.
10) Agree what the contact will cover at the start. Give the student space and time to add anything additional that may be causing them concern.
11) Set time parameters for the contact and do not go over these unless you have concerns about the student, or they disclose a safeguarding issue.
12) If you feel a conversation is moving into a direction that is too personal, end the contact (unless there are concerns about the student's safety or welfare)
13) If the student discloses a safeguarding issue, keep a clear written record of what has been said and any action you take (with the direction of a Designated Safeguarding Officer) as per the Safeguarding Policy (see page 26).

Annex H

Statement on British Values

The Department for Education has 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'.

The University of Salford 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

Annex I

Guidelines on recruitment, selection and employment procedures in relation to safeguarding vulnerable groups

The most likely circumstances in which the University will employ a young person under the age of 18 are through one of its various trainee and modern apprenticeship schemes. However, potentially a young person of under-18 may be employed in any of the University's more junior roles.

a. Legal duties

There are a number of restrictions affecting the employment of children and young people (i.e. those under 18 years of age), mostly relating to health and safety, working hours and training.

Under the **Employment Rights Act**, an employee aged 16 or 17 has a right to take time off work for study or training which leads to a relevant qualification. The amount of time that may be taken is that which is reasonable, taking into account the nature of the training or study and the needs of the employer.

Under the **Working Time Regulations 1998** young people employed as young workers are entitled to:

 A health and capacities assessment before being required to perform night work, and periodically thereafter

 A minimum daily continuous rest period of 12 hours

 Two days in every seven off per week (these will usually fall on the weekend)

 A minimum 30-minute rest break after 4½ hours of continuous work

The **Working Time (Amendment) Regulations 2002** give further protection to those aged 16 and 17:

- Working time is limited to 40 hours per week
- The maximum working day is eight hours
- Night working is prohibited under normal circumstances, but exceptions are allowed for certain sectors and circumstances

Under the **Management of Health and Safety at Work Regulations 1999**, employers must ensure that young persons are protected at work from any risks to their health or safety because of their age and inexperience, and must not be given work, which is beyond their physical or psychological capacity. Before young persons start work the employer must carry out a risk assessment to include:

- Their inexperience, their absence of awareness of existing or potential risks, and their immaturity
- The fitting out and layout of the workplace and the workstation
- The nature, degree and duration of exposure to physical, biological and chemical agents

Document Control Information			
Revision History incl. Authorisation: (most recent first)			
Author	**Summary of changes**	**Version**	**Authorised & Date**
Leanne Kirk/Andrew Hartley/Anji Gardiner	Approved at ULTC. Continuation of V4 work. Inclusion of U18s	V5	09/11/2022
Leanne Kirk/Andrew Hartley/Polly Smith	General review, separate definitions of safeguarding relating to adults and risk and children, changed wording of 'vulnerable adults' to 'adults at risk', updating reporting mechanisms (Report and Support) and added role of Lead DSO. Some information moved from policy into appendices section.	V4	01/09/2021
Leanne Kirk	Amended Deputy Designated Safeguarding Lead email address pg22	V3.4	18/03/2020
Leanne Kirk	Amended safeguarding proforma	V3.3	16/03/2020
Leanne Kirk	Amended named contact for Deputy Designated Safeguarding Lead and added safeguarding email contact	V3.2	09/03/2020
Craig Best	Amended name contact for Deputy Designated Safeguarding Lead	V3.1	
Dianne Atherton-B	General review, inclusion of former student vetting policy, updated reporting mechanisms	V3	Approved by VCET 17/09/2019
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	
M. Rollinson, J. Clements, K. Ramsden & J. Hinsley	Document approved by SLT for consultation	V1.0	SLT
Policy Management and Responsibilities:			
Owner:	The General Council is the Policy owner and is Designated Safeguarding Lead on behalf of the University. Major Policy changes will be submitted to VCET for authorisation.		
Others with responsibilities:	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. *This is mandatory. October 2019*
Legal implications (LPG)	*2. N/A*
Information Governance (LPG)	3. *Throughout review*
Student facing procedures (QEO)	4. *N/A*
UKVI Compliance (Student Admin)	5. *N/A*
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