

Safeguarding Policy and Procedures

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Review date:	TBC
Status:	Non-contractual(Consulted)
Policy owner:	Human Resources

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1. Purpose

- 1.1 Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.
- 1.2 This policy is a statement of the University's commitment to safeguarding and protecting the welfare of children and vulnerable adults (as defined in [section 4](#)), in so far as they are engaged in university-related activities and services with the institution, its staff and students.

2. Scope

- 2.1 This policy applies to any staff member, student, volunteer or visitor within the University community.
- 2.2 This policy provides guidance on responsibilities in relation to the safeguarding of children and vulnerable adults and highlights the procedures that should be followed if it is suspected that a child or vulnerable adult is experiencing or is at risk of harm.
- 2.3 The primary responsibility of staff and other members of the University community is to report concerns to the relevant channels.
- 2.4 The term 'safeguarding' is used to refer to a number of areas of concern relating to children or vulnerable adults including:
 - a) Child protection issues;
 - b) Sexual exploitation/sexual abuse;
 - c) Radicalisation;
 - d) Physical abuse or neglect;
 - e) Psychological or emotional abuse or neglect;
 - f) Financial or material abuse;
 - g) Modern slavery;
 - h) Discriminatory abuse;
 - i) Domestic abuse;
 - j) Organizational abuse;
 - k) Self-neglect or risk to self/others;
 - l) Forced marriage;
 - m) Female genital mutilation

3. General Principles

- 3.1 The University is committed to creating a safe and secure environment for all its staff, students and visitors to its sites and will identify a lead safeguarding officer with responsibility for overseeing the implementation of this policy (as defined in [section 4](#) below).
- 3.2 The University recognises that in the course of fulfilling their duties members of staff and students will come into contact with children and vulnerable adults (as defined in [section 4](#) below).
- 3.3 In order to ensure it fulfils its duties, the University will ensure an appropriate member of Senior Management is designated as Lead Safeguarding Officer (LSO). The Lead Safeguarding Officer's responsibilities will include:
 - a) Implementing and promoting this policy;
 - b) Ensuring the policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and vulnerable adults;
 - c) Appointing Safeguarding Officers (SOs) and ensuring SOs are trained in relevant safeguarding procedures and competent in fulfilling their duties;
 - d) Ensuring appropriate and adequate resources are available in order that the University is able to meet its safeguarding responsibilities;
 - e) Ensuring that appropriate University members and University Committees are provided with appropriate reassurance that the University is meeting its safeguarding obligations;
 - f) Establishing and maintaining contacts with Children's and Adult Social Care Services, Police authorities and NHS Safeguarding Teams.
- 3.4 To support the Lead Safeguarding Officer (LSO), a number of Safeguarding Officers (SOs) will be appointed to ensure that members of the University community can access advice and share concerns with an SO at their location. The role definitions of the Lead Safeguarding Officer and Safeguarding Officers are outlined in [Appendix D](#).
- 3.5 Partner organisations working from University premises are expected to have a Safeguarding Policy in place, and an appointed SO in place to be part of the University SO network and to ensure that concerns can be raised easily across the institution (as defined in [section 4](#) below).

- 3.6 Safeguarding concerns will be taken seriously, will be considered fully and any such concerns will be reported in a timely manner to the relevant person and/or body (e.g. an SO or police.)
- 3.7 Safeguarding referrals to the relevant statutory body will be made on the basis of identified and evaluated risk.
- 3.8 Written records and referrals of safeguarding concerns will be maintained centrally. Such written records will be stored securely and only accessed by authorised staff. All personal data will be processed by the University in accordance with the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and the University's [Data Protection Policy](#) and [Records Retention Schedule](#).
- 3.9 University staff working with students or staff members who are the subject of safeguarding concerns will consider what support may be offered to the individual and will signpost accordingly. This may include referral to internal and/or external services.
- 3.10 Appropriate support will be available to staff who receive and report disclosures of safeguarding issues through the SO Team.
- 3.11 At any time there are a number of students across the University who are undertaking a formal placement or work experience opportunity linked to their course. In a number of course areas (notably within the Schools of Education and Health & Social Care) the University has a professional responsibility to our stakeholders to ensure that students who go on formal placement are 'fit to practise'.
- 3.12 In a work placement or professional work experience setting (including teaching, health and social care placements), a member of staff or student should report any safeguarding concern to the employer's Designated Safeguarding Lead, as per the employer's policy. The staff member of student must ensure that they read and understand the employer's policy.

4. Definitions

- 4.1 For the purposes of this policy, a child is defined as a person who is under the age of 18. In legal terms, the Care Act (2014) defines a vulnerable adult as an individual over the age of 18, who:
- a) has needs for care and support (whether or not the appropriate local authority is

meeting any of those needs) **and**;

b) is experiencing, or at risk of, abuse or neglect; **and**

c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

4.2 The term 'safeguarding' is often misused during situations where individual students are described by colleagues to be 'at risk' due to issues they may be facing with regard to their own health or wellbeing. For clarity unless the student(s) in such circumstances are classified either as a child or a vulnerable adult (as defined above) then this policy document will not be an appropriate guide. Colleagues should instead seek advice and guidance from Student Services colleagues.

4.3 As detailed in [Section 3](#), this policy recognises that the University is looking to create a safe environment for all its students, (including associate students on-site who are linked with partner organisations), staff, associate staff from partner organisations, formal visitors and contractors, and for members of the community who informally visit the University.

4.4 As detailed in [Section 3](#), it is expected that the following partner organisations working from University premises have Safeguarding Policies in place and an appointed Safeguarding Officer:

- University of Gloucestershire Students' Union
- INTO
- Uliving
- Baxter Storey (catering contractor)
- Securitas (security provider).

5. Examples of Safeguarding Concerns

5.1 The following are indicative examples of situations which may present safeguarding concerns and initiate the reporting procedure to the relevant person/body.

- A child or adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour;
- A student, staff member or visitor discloses information involving themselves, family members or any other child or adult which gives rise to concerns that an individual may be harming or abusing a child or a vulnerable adult;
- There are suspicions or indications that a child or a vulnerable adult is being abused or harmed, or is at risk of exploitation (including radicalisation), harm,

neglect or abuse.

- There are observable changes in a child or a vulnerable adult's appearance or behaviour that may be related to exploitation, harm or abuse, including radicalisation.
- A significant/substantiated concern is raised that an individual presents a risk of abuse or harm towards a child or a vulnerable adult.
- Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.
- A historic disclosure of sexual or physical abuse is made.
- Formal advice from police, probation or other government agencies.

5.2 The following incidents MUST always be reported to a relevant person/body:

- If a child or vulnerable adult is hurt or injured (emotionally damaged)
- If you are concerned that a relationship is developing with a child or vulnerable adult which could represent an abuse of trust
- If you are concerned that a child or vulnerable adult is becoming attracted to you
- If you are concerned that a colleague is becoming attracted to a child or vulnerable adult
- If a child or vulnerable adult misunderstands or misinterprets something you have done in a way which could be construed to be abusive or harmful
- If you have to use reasonable physical restraint to prevent a child or vulnerable adult from harming themselves or another, or from causing significant damage to property
- If a child or vulnerable adult reports an allegation of abuse regarding a member of an external organisation using University facilities.

6. Reporting a safeguarding concern

6.1 This section describes the process for reporting a safeguarding concern. A flowchart of this process can also be found in [Appendix A](#).

6.2 The duty to investigate suspected abuse or harm rests with statutory services; primarily the Police and Social Care Services. Staff and other members of the University Community who become aware of a safeguarding matter, whether from a victim or from a third party, should report such incidents by following these steps:

- a) Listen carefully and stay calm.
- b) Reassure the individual that what they have reported will be dealt with, making it clear however that you may have to share the information with other people to get the best help possible.
- c) Keep questions to an absolute minimum, do not interrogate the individual just clarify, record facts and observations. Any questions should be about any immediate health and safety concerns.
- d) Explain that you will need to report the matter to a Safeguarding Officer and explain the internal process.
- e) Make a full record of what was said and what you have done as a result. You should do so on the Safeguarding Concerns Reporting Form at [Appendix A](#).
- f) Report the matter immediately to a Safeguarding Officer. Contact details can be found in [section 12](#).

6.3 If a member of the University community has an **immediate and/or significant concern** for a child or vulnerable adult's immediate safety, they should refer the matter directly to the Police or Social Care Services using the contact details in [Section 12](#). After they have done so they are expected to then report the incident to a Safeguarding Officer using the Safeguarding Concerns Reporting Form at [Appendix B](#).

6.4 Where the situation is not urgent, safeguarding concerns should be reported to a Safeguarding Officer using the Safeguarding Concerns Reporting Form at [Appendix B](#).

6.5 On receipt of a referral the Safeguarding Officer will limit their enquiries to what is necessary in order to:

- a) Address any serious and immediate risk to the child, vulnerable adult or any other party.
- b) Preserve any evidence likely to be lost before external agencies can respond.
- c) Determine the appropriateness of a referral to Social Care Services, the Police or another appropriate agency and provide sufficient information to the relevant external agency to enable an effective response.
- d) Determine any further University procedures which should be invoked.
- e) Identify any internal support required by the child or vulnerable adult.

This may be carried out in conjunction with relevant colleagues and/or the Lead Safeguarding Officer.

- 6.6 The receiving SO will liaise with the LSO to determine the need to refer to Social Care Services, the Police or any other external agency; if a referral to an external agency is deemed appropriate the LSO or SO will make the referral.
- 6.7 If a member of staff wishes to discuss a potential referral before completing the form they may contact a Safeguarding Officer and discuss the referral in principle without providing any names or identifying details. Contact details for Safeguarding Officers are included in detailed in [Section 12](#).
- 6.8 Where the suspected abuse is alleged to have been carried out by a member of the University community, the University will work alongside external agencies during any investigations. If necessary, the appropriate University investigation and disciplinary procedures may be invoked.

7. Record Keeping

- 7.1 Upon receiving a report the Safeguarding Officer will be responsible for ensuring that a full record is kept of the risk assessment process and of any action taken subsequently. This will be done in accordance with the University's [Data Protection Policy](#).
- 7.2 The Safeguarding Officer will report brief details of all referrals, regardless of whether the matter was referred to an external agency, to the Lead Safeguarding Officer.
- 7.3 The Lead Safeguarding Officer will hold on record details of all referrals.

8. Admission of students under 18 years of age

- 8.1 In admitting students under the age of 18 the University acknowledges that it will have an enhanced duty towards these individuals as they are children. The following steps will be taken to ensure that the University meets its obligations to safeguard students under the age of 18:
- a) As per the process set out in our [Admissions Policy](#) the University will require the student's parent/guardian to sign a Consent Form confirming that they have understood that the University is not in *loco parentis*. Where the child is looked after away from home, appropriate contact will be made with their Local Authority, including with their Social Worker.

- b) The University will ensure that it holds a list of the student's emergency contact details, in particular those of parents/ guardians.
- c) The University will ensure that a DBS disclosure has been obtained for any staff members the University considers will have close, unsupervised contact with the student. The University will apply 'safer recruitment' practice for posts requiring a DBS enhanced check.
- d) The University will provide a list of students who are under 18 years of age to:
 - i) The Head of Student Accommodation & Welfare
 - ii) The Head of Student Wellbeing
 - iii) The Student Registrar
 - iv) All Safeguarding Officers
 - v) The appropriate Personal Tutor
 - vi) The appropriate Senior Tutor
 - vii) The Chief Executive of the Students' Union
 - viii) The Designated Premises Supervisor responsible for the operation of campus bars
- e) The University will not normally allow students under the age of 16 to live in University Hall accommodation.

9. Use of University Facilities by External Organisations

- 9.1 A number of the University's facilities, most notably sporting facilities, are hired by external organisations for events, some involving children or vulnerable adults. In such cases the University assumes no liability for the conduct of individuals from these organisations. However, the University wishes to ensure that safeguarding risks are mitigated as far as possible for such external events/bookings.
- 9.2 In organising any event the University and the external organisation will comply with University [Safety Policies](#).
- 9.3 All external organisations requesting the use of University facilities for activities involving children or vulnerable adults will be asked to sign a declaration confirming that they have obtained appropriate checks on their staff and volunteers before they are permitted to use University facilities. A copy of the declaration form can be found

in [Appendix C](#) of this policy. The organisation will also be asked to confirm they have a Safeguarding Policy in place, and share the policy with the University before the booking can be confirmed.

- 9.4 If an organisation that intends to use the University's facilities for an event with children or vulnerable adults present does not have a Safeguarding Policy in place they will not be permitted to use University facilities.

10. Disclosure & Barring Service (DBS) Checks

- 10.1 The University will ensure that any staff or students working with children or vulnerable adults on a substantial basis, or having close, unsupervised contact with children or vulnerable adults, will have an appropriate DBS check carried out; this will always be an 'enhanced check'. Responsibility for ensuring such checks are conducted rests with the line manager.
- 10.2 Students enrolled on a specified course related to initial teacher training, social work or health at the University will be required to have an enhanced DBS check as a matter of course, and before enrolment.
- 10.3 The procedure for carrying out DBS checks for students and staff are detailed in the University's guidance documents on the [Disclosure and Barring Service \(DBS\)](#).

11. Policy Review

- 11.1 This policy will be reviewed by the Director of HR and the Lead Safeguarding officer on a two-yearly basis or more often if there are any changes in legislation or the statutory duties which fall on the University.

12. Key Contacts

Organisation	Role	Name/Job Title	Tel	e-mail
University	Lead Safeguarding Officer (LSO):	Stewart Dove (Student Registrar)	01242 714536	stewartd@glos.ac.uk
University	FCH Safeguarding Officer (SO)	TBC		
University	Oxstalls Safeguarding Officer (SO)	TBC		
University	Park Safeguarding Officer (SO)	TBC		
University	Pittville Safeguarding Officer (SO)	TBC		
Students' Union	Safeguarding Officer	TBC		
INTO	Safeguarding Officer	TBC		
Uliving	Safeguarding Officer	TBC		
Baxter Storey	Safeguarding Officer	TBC		
Securitas	Safeguarding Officer	TBC		

University Security:

- FCH & Hardwick Campus: 01242 71 4836 / 07736 692087
- Oxstalls Campus: 01242 71 5231 / 07793 245017
- Park Campus: 01242 71 4402 / 07801 183630
- Pittville Student Village: 01242 71 4934 / 07854 560861

Gloucestershire Police:

- Emergencies: 999
- Non-emergencies: 101

Gloucestershire County Council:

- Children's Social Services: 01452 426565
- Adult Social Services: 01452 426868

Childline: 0800 1111

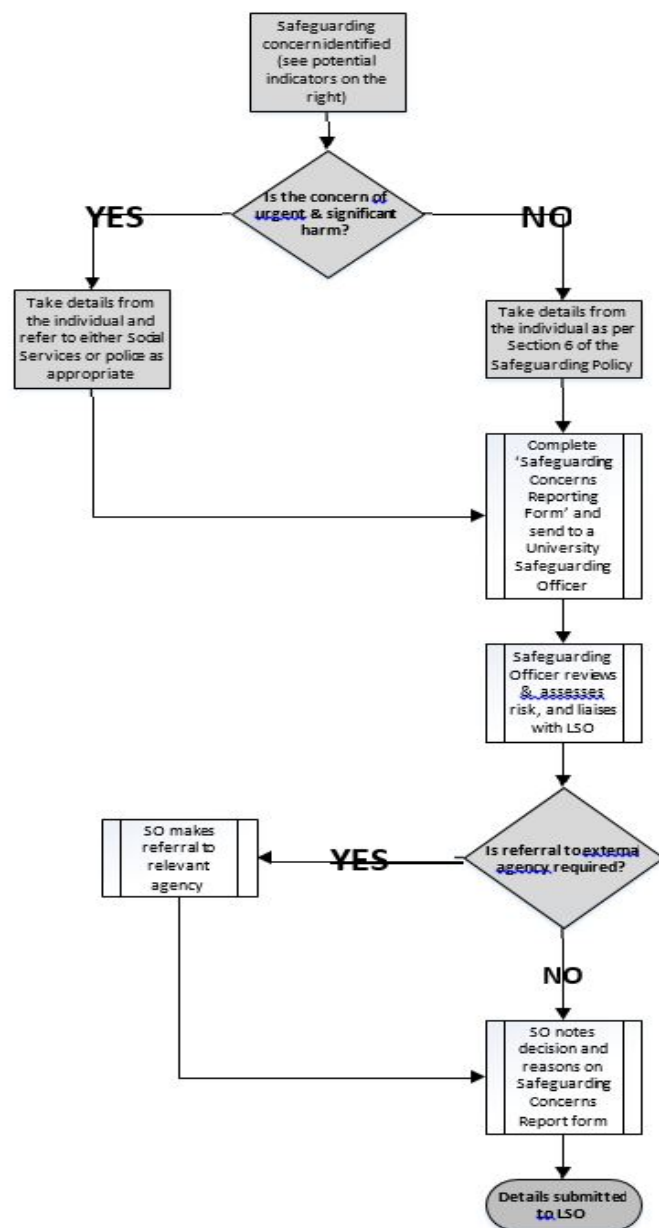
13. Related Policy Documents

- Student Wellbeing Strategy 2018-23
- [Student DBS Procedures](#)
- Staff DBS Procedures (HR - TBC)
- Student Admissions Procedures (CMSR - TBC)
- Students Under 18 Admissions Procedures/Guidance (CMSR - TBC)
- Student Disclosure of Criminal Records Policy (CMSR – TBC)
- [University Policy Related to the UK Prevent Strategy](#)
- [Visitors & Children on University Premises](#)
- [HR Recruitment & Selection Guidance](#)
- [Fitness to Practice Procedures](#)
- University Safety Policies

14. Appendices

- [Appx A: Safeguarding Reporting Process Flowchart](#)
- [Appx B: Safeguarding Concern Reporting Form](#)
- [Appx C: External Organisation Safeguarding Declaration Form](#)
- [Appx D: Definitions of Safeguarding Roles and Responsibilities](#)

Appendix A – Safeguarding Reporting Process Flowchart



Examples of safeguarding concerns

- A child or adult raises an allegation of current abuse, harm, neglect or other inappropriate behavior;
- A student, staff member or visitor discloses information involving themselves, family members of any other children or adult which gives rise to concerns that an individual may be harming or abusing a child or a vulnerable adult;
- There are suspicions or indications that a child or a vulnerable adult is being abused or harmed, or is at risk of exploitation (including radicalization), harm, neglect or abuse;
- There are observable changes in a child or a vulnerable adult's appearance or behavior that may be related to exploitation, harm or abuse, including radicalization;
- A significant/substantiated concern is raised that an individual presents a risk of abuse or harm towards a child or a vulnerable adult;
- Concerns arise that a student or member of staff is vulnerable to radicalization and there is an identifiable risk of the individual being drawn into terrorism;
- A historic disclosure of sexual or physical abuse is made, where the perpetrator still has access to children or adults at risk.

Important Contacts:

Lead Safeguarding Officer: Stewart Dove

01242 714536

stewartd@glos.ac.uk

Safeguarding Officers: TBC

Police: 101 / 999

Gloucestershire Children's Social Services: 01452 426565

Gloucestershire Adult Social Services: 01452 426868

Appendix B - University of Gloucestershire Safeguarding Concerns Reporting Form

If you have immediate and significant concerns about a child or vulnerable adult's safety you should make the referral to the Police or Social Services first, and then submit this form to a Safeguarding Officer.

- For referrals concerning a child:
 - contact Children's Social Care Services on 01452 426565
- For referrals concerning vulnerable adults:
 - contact Adult Social Care on 01452 426868

For all non-urgent referrals please complete this form as fully as possible and send to a University Safeguarding Officer without delay.

UNIVERSITY SAFEGUARDING OFFICERS:

Name & Role	Campus	E-mail	Phone
Stewart Dove	Park	stewartd@glos.ac.uk	01242 714536
	FCH		
	Oxstalls		
	Pittville		

SECTIONS A-F TO BE COMPLETED BY THE REFERRER

REFERRAL TO : Safeguarding Officer	
Date of Referral:	Time of Referral:
A. Details of Child/ Vulnerable Adult	
Child/ Vulnerable adult's name & ID number if a student/staff member	DOB & Age:
Gender:	Disability [if known please specify]
Address	
Postcode	Tel No
Name of child's primary carer/s	Relationship to child

E. Details of any alleged incident (if there are no specific incidents to report then insert N/A below)

Date of alleged incident:	Time:
Name of Witnesses (if appropriate)	Contact Details (if known)

Describe in detail what happened. If the child/vulnerable adult gave an account, please record what they said. Use additional paper if required.

F. Details of any action already taken by the referrer

Note any referrals made to internal or external support/agencies

TO BE COMPLETED BY THE SAFEGUARDING OFFICER

G. Details of action taken following the receipt of this referral

H. Details of External Agencies contacted

Police	Force & Contact, Incident Number	
Social Services	Dept & contact, advice received	
Other (& ID if a student/staff member)	Organisation, contact & advice received	

I. Other Information

Record any other relevant information

Signature of Safeguarding Officer	
Print Name	
Date	

Appendix C – External organization Safeguarding Declaration



External Organisation Safeguarding Declaration

On behalf of (*name of hiring organisation*) I confirm that we have received a copy of the University of Gloucestershire's *Safeguarding Policy and Procedures* document dated ***** 2019 and further that:

- Our organisation has a formal safeguarding policy (*please attach a copy when returning this declaration to the University*)

Appropriate checks (e.g. DBS) are made on our staff and volunteers in accordance with safeguarding legal requirements.

Signed: _____

Print Name: _____

Position with organization: _____

Date: _____

Please note that your booking cannot be confirmed until a completed copy of this form is returned to:

University of Gloucestershire
Estates Department
Dunholme Villa
Park Campus
The Park
Cheltenham
GL50 2RH

Appendix D – Definitions of University Safeguarding Officer Roles and Responsibilities

Lead Safeguarding Officer (LSO) will:

1. Have overall responsibility for the University's safeguarding practice;
2. Create and maintain a network of Safeguarding Officers;
3. Work in partnership with the Director of HR to ensure relevant policies/procedures are in place and reviewed;
4. Refer cases of suspected abuse or allegations to social services, police or appropriate agencies as appropriate;
5. Liaising with external agencies as appropriate.
6. Ensure accurate written records of referrals/concerns are stored securely and shared appropriately (where concerns have not required referral to social services or police a record should still be retained)
7. Work in partnership with the Director of HR to ensure all members of staff and students are aware of their responsibilities under the University's safeguarding policy and procedures.

The Lead Safeguarding Officer for the University is the Student Registrar.

Safeguarding Officers (SOs) will:

1. Have operational responsibility for the University's safeguarding practice;
2. Undergo safeguarding training and undertake refresher training as appropriate;
3. Refer any child protection concerns, where appropriate, to social services, police or appropriate agencies in the absence of the LSO
4. Provide information and advice within the University on safeguarding issues.
5. Positively engage in the University's network of SO's to share good practice and maintain appropriate CPD

Safeguarding Officers will be appropriate managers based on the appropriate campus location

Record of policy/procedure changes/update

Status: Non-Contractual (consulted)

Policy Owner: Human Resources

Effective date	Change/update:	Policy agreed at JNCC:	Policy agreed at RHRC (or equivalent)
* New * Jan 2019	<p>Replacing</p> <ul style="list-style-type: none"> - Child Protection and Vulnerable Adult Procedures - Child Protection and Vulnerable Adult Framework and Policy Statement <p>The following provides a summary of the key changes</p> <ul style="list-style-type: none"> o - Updated terminology to reflect current language used, for example, reference to Adults at Risk instead of Vulnerable Adults o - Inclusion of additional areas of concern that can relate to children or adults at risk, for example domestic abuse, radicalisation, modern slavery o Introduction of local safeguarding officers in addition to the Lead Safeguarding Officer. This is to ensure the University is not “one deep” and there are contacts on each campus o Updated in relation to GDPR requirements o Clarification of the expectation that partner organisations will have safeguarding policies and an appointed safeguarding officer in place before a booking to use our facilities is confirmed o Revision of the steps to ensure the University meets its obligations to safeguard students under 18 years of age – this has been particularly important for nursing programmes o Recognising a commitment to Safer Recruitment processes when there is a need o Inclusion of a safeguarding process flowchart for ease of reference o Inclusion of a Safeguarding Concerns Reporting Form and an External Organisation Safeguarding Declaration to ensure much better documentation of how concerns are dealt with and assuring that other organisations are compliant. 	23 Jan 2019	-
	Child Protection & Vulnerable Adults Procedures		
Nov 2009	-	Oct 2009	-
Aug 2006	-	-	-
	Child Protection & Vulnerable Adults Framework & Policy Statement		
Jun 2009	-	-	-
Apr 2005	-	-	-