

## SAFEGUARDING POLICY

### Section A: Introduction and overview

A1.1	Safeguarding is about protecting children, young people and vulnerable adults from abuse or neglect. Safeguarding is a consideration for a range of University activities: some Northumbria students and staff may be under 18 (legally classed as a child) or meet the definition of a vulnerable adult. Children and vulnerable adults may come into contact with the University through recruitment and outreach activities, fieldtrips, participation in research, sporting or voluntary activities on and off campus or by being taught or cared for by students training to enter Education or Health services, as part of their academic studies.
A1.2	All individuals acting on behalf of the University are responsible for the safety of under-18s and vulnerable adults, to ensure we protect the most vulnerable members of our society. It is important that all members of the University know how to spot possible signs of abuse and neglect and how to report a concern, to ensure suspicions are investigated.
<b>A2</b>	<b>Key Definitions</b>
A2.1	<u>Safeguarding</u> The process of protecting children and vulnerable adults from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children and vulnerable adults to have optimum life chances and enter adulthood successfully.
A2.2	<u>Child or Children</u> - Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection. <sup>1</sup>
A2.3	<u>Vulnerable Adults and “Adults at Risk”</u> - An adult is any person aged 18 or over. Some adults may be vulnerable and entitled to be safeguarded because they are unable to protect themselves against significant harm or exploitation. <sup>2</sup> It is recognised that any adult can suffer neglect or be subjected to abuse. There are many factors which can increase an individual’s vulnerability: indicators of possible vulnerability include a mental health issue, dementia, a physical disability, a learning disability, a condition within the autistic spectrum, a significant difficulty related to vision (requiring more than correction through spectacles and contact lenses alone), a significant difficulty related to hearing (requiring more than correction through hearing aids alone), complications related to frailty or a serious illness. A vulnerable adult may be receiving support services from the local authority, the NHS or a non-statutory agency, but this will not always be the case. When considering if an adult is vulnerable and requires safeguarding, it is important to consider whether the adult has support needs because of one of the issues listed above, regardless of whether support is currently being provided.
A2.4	<u>Abuse</u> – Maltreatment of a child or vulnerable adult. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Abuse can be perpetrated by adults and/or children. Detailed guidance on the abuse and neglect that can affect children and adults is available for staff.
A2.5	<u>Neglect</u> – The persistent failure to meet a child or vulnerable adult’s basic physical and/or psychological needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of individual’s health or development. Detailed guidance on the abuse and neglect that can affect children and adults is available for staff.
A2.6	<u>Principal Safeguarding Officer (“PSO”)</u> – the University Executive member responsible for the oversight and coordination of the Safeguarding Policy, including: <ul style="list-style-type: none"> <li>i. oversight and co-ordination of the University’s safeguarding arrangements;</li> <li>ii. ensuring the Safeguarding Policy is promoted and disseminated, along with related guidance and training for appropriate individuals;</li> </ul>

<sup>1</sup> Definitions taken from Working Together to Safeguard Children (2015) statutory guidance.

<sup>2</sup> Definition and indicators influenced by the Care Act 2014

	<ul style="list-style-type: none"> <li>iii. working with the pool of Designated Safeguarding Officers within the University and oversight of their training requirements;</li> <li>iv. maintaining a register of University activities where children and vulnerable adults are likely to feature, to assist in targeting procedural controls and training;</li> <li>v. maintenance and oversight of the secure central record of reported concerns and allegations (used by DSOs) and the specific review of all concerns reported internally to check for potential connections between these, which when viewed together, may indicate the need to make an external referral to the relevant local authority;</li> <li>vi. in conjunction with the Director of Human Resources, the management of external reporting related to all allegations or suspicion of abuse by University staff to the Local Authority Designated Officer.</li> </ul>
A2.7	<u>Designated Safeguarding Officers (“DSOs”)</u> – The members of Northumbria University staff who are trained to receive and respond to reported concerns and/or allegations of abuse or neglect, and to make external referrals if required. A concentrated pool of DSOs are identified, drawn from areas responsible for co-ordinating on a regular basis contact with under 18s and vulnerable adults, including Student Support and Wellbeing, Student Recruitment and Sport, with additional DSOs located in Governance Services. The list of DSOs is available on the University intranet.
A2.8	<u>Disclosure and Barring Service (“DBS”) check</u> – A pre-appointment safe recruitment check which is carried out on all staff and students involved in “regulated activity”.
A2.9	<u>“Regulated activity”</u> – This involves close and unsupervised contact with under 18s and vulnerable groups which cannot be undertaken by a person on the DBS’s Barred List.
<b>A3</b>	<b>Legislative context</b>
A3.1	<p>The University has a common law duty of care to ensure, so far as is reasonably practicable, the health, safety and welfare of all vulnerable individuals and groups accessing its services and facilities. This includes its obligations under the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and the Care Act 2014, which included key changes to what was meant by a vulnerable adult and adults at risk. See A.2.3. The University’s duties are satisfied through application of a range of specific statutory and non-statutory guidance:</p> <ul style="list-style-type: none"> <li>i. Working Together to Safeguard Children (2015)</li> <li>ii. What to do if you are worried a child is being abused (2015)</li> <li>iii. Information sharing advice for safeguarding practitioners (2015)</li> <li>iv. Keeping children safe in Education (2015)</li> </ul>

## **Section B: Scope and application of this Policy**

B1.1	<p>This Policy applies to:</p> <ul style="list-style-type: none"> <li>i. all staff, governors and third parties acting on behalf of the University and</li> <li>ii. all University-controlled activities undertaken in the UK and overseas, involving students and partner organisations.</li> </ul>
B1.2	Northumbria University Nursery maintains its own Safeguarding Policy.
B1.3	The Policy does not apply to Northumbria Students’ Union.
<b>B2</b>	<b>The University’s approach to Safeguarding</b>
B2.1	<p>The University’s safeguarding arrangements are underpinned by key principles:</p> <ul style="list-style-type: none"> <li>i. all individuals, including children, young people and vulnerable adults, have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation;</li> <li>ii. the welfare of the child or vulnerable adult is, and must always be, the paramount consideration;</li> <li>iii. safeguarding is everyone’s responsibility. All individuals acting on behalf of the University are responsible for safeguarding under-18s and vulnerable adults.</li> </ul>
B2.2	<p>The University will seek to ensure the safety and wellbeing of all children and adults, including vulnerable adults, by ensuring:</p> <ul style="list-style-type: none"> <li>a) clear roles and responsibilities for the prevention of abuse and neglect and the reporting</li> </ul>

	<p>and referral of safeguarding related concerns;</p> <p>b) safe recruitment practices are in place to ensure all staff and students involved in regulated activity are subject to the appropriate DBS clearance procedures;</p> <p>c) risk assessments and associated internal controls for activities involving children and/or vulnerable adults;</p> <p>d) appropriate safeguarding training for staff and behaviour protocols when working with children and vulnerable adults;</p> <p>e) robust procedures for reporting and handling allegations or concerns about possible abuse and/or neglect of children or vulnerable adults, including the appointment of suitably trained Designated Safeguarding Officers within the University, and external referral, where required to Local Authorities (including the Local Authority “Designated Officer”, for concerns allegations involving staff members);</p> <p>f) adequate records are maintained and information is shared appropriately on a need to know basis;</p> <p>g) learning from incidents by improving internal controls.</p>
B2.3	The University will encourage its staff, contractors and partners to report concerns and allegations of abuse and neglect. (See <b>Section C</b> ) The University will not tolerate any act of abuse or neglect carried out by its own staff or by third parties acting on behalf of the University and may instigate disciplinary procedures or contract termination clauses, where appropriate.
<b>B3</b>	<b>Implementing the Policy</b>
B3.1	<p><u>Policy responsibilities</u></p> <p>The Head of Governance is the Principal Safeguarding Officer and is responsible for this Policy, with the Risk Manager as the Deputy. See A2.6.</p>
B3.2	<p><u>Safe Recruitment of staff and students</u></p> <p>a) The Director of Human Resources is responsible for managing procedures associated with the safe recruitment of staff, including the identification of posts which involve regulated activity and which require a DBS check.</p> <p>b) The Academic Registrar is responsible for managing procedures associated with the safe recruitment of students whose studies involve regulated activity and who require a DBS check.</p>
B3.3	<p>All University staff and third parties acting on the University’s behalf are expected to:</p> <p>a) follow the University's guidance on safeguarding issues and to undertake all training associated with this Policy;</p> <p>b) bring to their line manager's attention any concerns or queries over whether their work activities would require them to have an appropriate level of DBS clearance;</p> <p>c) co-operate fully with any internal or external investigations carried out into reported concerns;</p> <p>d) maintain confidentiality about any suspected or actual incidents involving the University, through the University’s safeguarding reporting systems and whistleblowing arrangements, as required. Some staff and students may also be required to make use of the safeguarding reporting systems and whistleblowing arrangements in operation in other workplaces, placement providers and so on, where similar expectations of confidentiality would apply.</p> <p>A Safeguarding Behaviour Code for working with children and vulnerable adults and an associated training programme are available.</p>
B3.4	<p><u>Dealing with concerns and allegations</u></p> <p>The Principal Safeguarding Officer is supported by a team of Designated Safeguarding Officers. See A2.7. The PSO, in consultation with the Director of Human Resources, is responsible for ensuring all allegations made against members of University staff are referred externally to the relevant Local Authority Designated Officer, as required by statutory guidance.</p>
B3.5	<p><u>Other key responsibilities</u></p> <p>Other key postholders who will typically be involved in aspects of safeguarding include:</p> <ol style="list-style-type: none"> <li>i. the Head of Student Support and Wellbeing (“SSW”) manages advice and support services relevant to under-18 students or students who may be vulnerable;</li> <li>ii. the Head of Admissions and Director of International who will refer applicants under</li> </ol>

	<p>18 at the time of enrolment to SSW to review additional support requirements;</p> <p>iii. the Assistant Director (Health, Safety and Sustainability) ensures that Health and Safety Risk Assessment training incorporates assessment for activities involving under-18s and vulnerable adults;</p> <p>iv. the Records and Information Compliance Manager, who will provide advice and guidance on Information Sharing protocols in relation to matters involving under 18s and vulnerable adults;</p> <p>v. the Head of Security may be involved in police liaison associated with safeguarding cases.</p>
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### **Section C: Dealing with concerns or allegations of abuse or neglect**

C1.1	Concerns and allegations about abuse or neglect arise in a variety of ways, including internal sources (e.g. staff members) or external sources (e.g. partners, contractors), and require sensitive and careful handling. The University's Safeguarding Behaviour Code provides general guidance on dealing with situations that give rise to safeguarding concerns. A flowchart showing the reporting channels for raising concerns ( <b>Annex A</b> ) is available to all staff and third parties.
C1.2	The person raising the concern should not investigate the alleged or suspected abuse under any circumstances, but should obtain sufficient information in order to refer the matter to one of the University's DSOs who will consider the matter.
C1.3	Where there is no imminent danger or emergency situation involving the child or vulnerable adult, concerns should be communicated to a DSO, using <b>Form SAFE1</b> , but may be made orally in some circumstances. Submission of the completed form may be preceded by informal advice from a DSO. The form requires a brief description of the situation in which the concern emerged, the individual(s) possibly involved and any evidence supporting the concern. In cases where this process is deemed inappropriate by the person raising the concern, the allegation can be raised using the University's <b>Public Interest Disclosure ("Whistleblowing") Policy</b> on the advice of the Head of Governance.
C1.4	The DSO will consider the concern or allegation, notify the PSO and decide whether to refer the matter to either Children or Adult Social Care Services within the relevant Local Authority. Where the concern or allegation relates to a staff member, the DSO will instead notify the Director of Human Resources and PSO who are responsible for reporting the concern to the Local Authority Designated Officer, as required by statutory guidance.
C1.5	All reported concerns and allegations will be notified by the relevant DSO to the PSO, who will oversee all reported concerns and allegations on the secure central record system, including follow-up actions. The PSO will review all concerns reported internally to check for potential connections between these, which when viewed together, may indicate the need to make an external referral to the relevant Local Authority.
C1.6	<u>In cases where other organisations are involved</u> Concerns or allegations may come to light when individuals acting on behalf of the University are involved in activities led by, or held on the premises of, external organisations. The individual with the concern should report the concern through the safeguarding arrangements of the external organisation. If they are unsure of which reporting route to follow or are not satisfied with the host organisation's response, they are encouraged to seek advice from a DSO or the Principal Safeguarding Officer. Raising a concern about the matter via the University's arrangements may also be appropriate, particularly if they are not satisfied with the host organisation's response or are unsure of which reporting route to follow. This is to ensure that the welfare of the child or vulnerable adult is of paramount concern.
C1.7	<u>Confidentiality</u> All concerns and allegations made are treated in confidence, including the identity of the individual raising the concern where this is practicable. Absolute confidentiality cannot be guaranteed if, as a result of an investigation, individuals are requested to participate in statutory safeguarding processes.

C1.8	<p><u>Treatment of anonymous reports</u> Anonymous allegations or concerns will be accepted and acted on, as there may be genuine reasons why an individual may not feel able to disclose their identity. However, anonymous enquiries may not facilitate any internal or external investigation process and disclosure of the individual raising the concern is encouraged. Anonymous individuals will be encouraged to give contact details and reminded of the University's confidentiality and "whistleblowing" processes.</p>
C1.9	<p><u>Treatment of malicious reports</u> If an allegation is determined to have been made frivolously, in bad faith, maliciously, for personal gain or for revenge, disciplinary action may be taken against the person making such an allegation. No disciplinary action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.</p>
<b>C2</b>	<b>Considerations when concerns/allegations involve staff members</b>
C2.1	<p><u>Staff suspension during investigation</u> The Principal Safeguarding Officer will liaise with the Director of Human Resources where staff suspension may be required during any investigations by external safeguarding authorities and/or under the University's disciplinary procedure. This decision will be influenced by the advice of external safeguarding authorities.</p>
C2.2	<p><u>Disciplinary action</u> The University will follow disciplinary procedures for any staff member who has committed abuse or neglect in the course of their employment which may result in dismissal.</p>
C2.3	<p><u>References for employees disciplined or prosecuted for safeguarding offences</u> Any request for a reference for a member of staff who has been disciplined or prosecuted for abuse or neglect in the course of their work activities shall in all cases be referred to the Director of Human Resources.</p>
<b>C3</b>	<b>Considerations when concerns/allegations involve current NU students</b>
C3.1	<p><u>Student suspension during investigation</u> The Principal Safeguarding Officer will liaise with the Student Appeals &amp; Complaints Ombudsman and Head of Security, where it may be necessary to suspend a student under the University's Student Regulations during an investigation by external safeguarding authorities. This decision will be influenced by the advice of external safeguarding authorities.</p> <p><u>Students on placement at external partners</u> It is possible that concerns or allegations may be made against students in connection with their work experience or work placement, study or at external partners. In such cases, the external partner supervising the student activity (e.g. NHS, Local Authority school or private sector partner) is likely to receive and investigate the concern through their own safeguarding arrangements, to make a referral to safeguarding authorities, if required, and to notify the University of the issue.</p>
C3.2	<p><u>Disciplinary action</u> The University will follow disciplinary procedures for any student who has committed abuse or neglect in the course of their registration with the University which may result in expulsion under the University's Student Regulations.</p>
<b>C4</b>	<b>Concerns and/or allegations about radicalisation</b>
C4.1	<p>Where appropriate, concerns or allegations about possible radicalisation may also be considered from a safeguarding perspective, only if there is likelihood of increased personal vulnerability (e.g. due to the recruitment tactics employed by radicalisers) and the possibility of associated abuse. Other referral options exist for such cases to external safeguarding and statutory agencies as required. Principles of academic freedom would obviously be taken into account in such cases.</p>

#### **Section D: Record Keeping and Information Sharing**

<b>D1</b>	<b>Record Keeping</b>
D1.1	Records associated with safeguarding referrals involving children (i.e. under 18s) and/or vulnerable adults will be retained confidentially, in accordance with data protection and

	other legal requirements, and the University's Record Retention schedule.
D1.2	The internal transfer of information relating to safeguarding referrals will be subject to specific protocols issued to Designated Safeguarding Officers, with key requirements included in safeguarding training for staff.
<b>D2</b>	<b>Information Sharing</b>
D2.1	Information relating to certain safeguarding referrals will be shared with external safeguarding authorities (e.g. Local Authorities, Police), as appropriate and with due regard to statutory and non-statutory guidance.
D2.2	As outlined in Section C2, all allegations made against members of University staff will be referred to the relevant Local Area Designated Officer(s), as required by statutory guidance.

### **Section E: Further help and guidance about the Safeguarding Policy**

For general guidance on the application of this Policy, please contact:

- Dr Adam Dawkins, Principal Safeguarding Officer, Head of Governance, extension 4520 [adam.dawkins@northumbria.ac.uk](mailto:adam.dawkins@northumbria.ac.uk)
- Susan O'Donnell, Risk Manager, extension 4222 [susan.odonnell@northumbria.ac.uk](mailto:susan.odonnell@northumbria.ac.uk)

For guidance on the Policy on Research involving Children or Vulnerable Adults, please contact:

- Dr. Nick Neave, Reader, School of Life Sciences, extension 4476 [nick.neave@northumbria.ac.uk](mailto:nick.neave@northumbria.ac.uk)

For guidance about DBS checks, please contact:

NU Student DBS checks (including Post Graduate students):

- Amy Brooks, Academic Registry Services Manager, extension 4119 [amy.brooks@northumbria.ac.uk](mailto:amy.brooks@northumbria.ac.uk)

NU Staff DBS checks:

- Amanda Weir, HR Manager, extension 7196 [amanda.weir@northumbria.ac.uk](mailto:amanda.weir@northumbria.ac.uk)

The list of current Designated Safeguarding officers can be found [here](#).

### **Related Policies**

Other relevant policies linked with this Policy include:

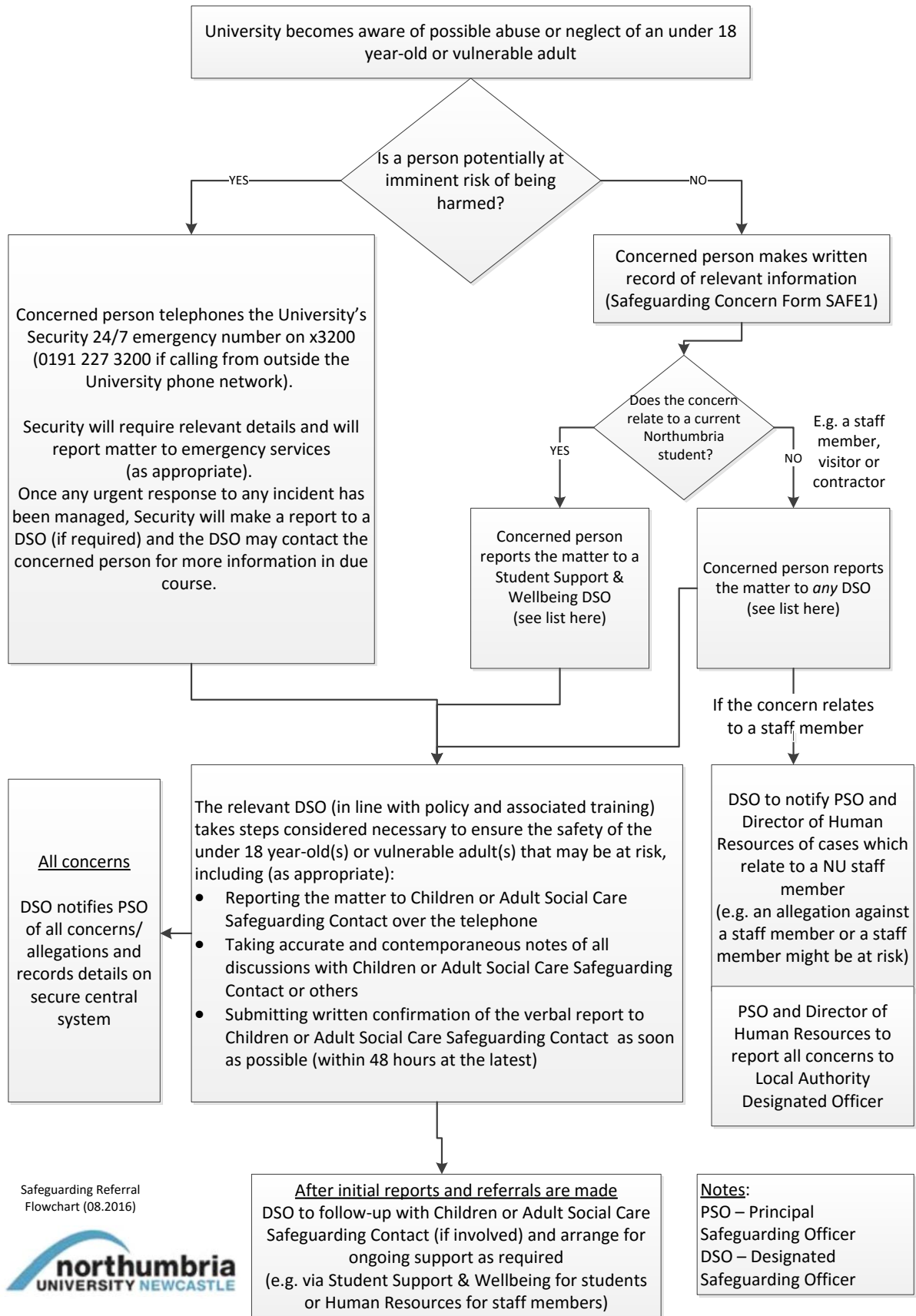
- Policy on Research involving Children or Vulnerable Adults
- Recruitment of Ex-Offenders Policy (Staff)
- Recruitment of Ex-Offenders Policy (Students)
- Public Interest Disclosure ("Whistleblowing") Policy
- Staff Code of Conduct
- Handbook of Student Regulations
  - a. Equality & Diversity Policy
  - b. Health and Safety Policy
  - c. Disciplinary Procedure

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### **Associated Procedure & Guidance Notes**

- Definitions of abuse and neglect (April 2015)
- Signs and symptoms of abuse and neglect (April 2015)
- Safeguarding Behaviour Code (July 2016)
- Safeguarding Referral Procedure Note for DSOs
- DBS Procedures for Staff and Students

## Raising concerns – flowchart



Safeguarding Referral Flowchart (08.2016)

