

## SAFEGUARDING POLICY

### Statement of commitment

1. The University of Suffolk aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children, young people, adults at risk and others who study at, work at and visit the University.

### Scope

2. This policy applies to all University students (*please see <sup>1</sup>*) and staff employed by the University, staff employed at the Partner Colleges who teach on University of Suffolk programmes (*although please see <sup>2</sup>*), and volunteers, who may be working with the following groups whom the University encounters through its teaching and research activities as well as through its outreach programmes:

- children and young people aged under 18 years
- adults at risk (as defined by section 42 of the Care Act 2014)
- any persons who may be at risk of being radicalised by any extremist group or ideology under the terms of the Counter Terrorism and Security Act 2015 (Section 26(1)) and as defined in the Prevent Duty guidance, 2015

Except where necessary to specify, hereafter these groups will be collectively referred to as 'at risk groups' or 'at risk individuals'.

3. The policy has particular relevance to the following areas of activity where at risk individuals may be engaged:

- Promotional activity, including open and visit days, summer schools and taster sessions
- Provision of advice and guidance
- Suitability of course content
- Application and enrolment processes

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<sup>1</sup> *'University student' refers to all students studying at the University irrespective of the nature of the programme. A university student may be an apprenticeship, undergraduate, postgraduate or continuing professional development student, by way of example.*

<sup>2</sup> *Staff who teach on University of Suffolk programmes at Partner Colleges are employees of their respective Colleges. The Colleges, as providers of further education have their own robust statutory child protection policies and procedures in place. This Policy recognises that it cannot override each College's individual policy as it relates to its own employees. However, this Policy does provide a coherent framework for how safeguarding matters are dealt with in respect of all University of Suffolk students at whichever campus they are studying. This also applies to the accompanying Code of Conduct.*

- Additional requirement and special needs assessment processes
- Selection and recruitment of staff
- Tutor-student interactions including face-to-face tutorials
- Communications, including electronic communications
- Student residential accommodation
- Placements and field trips
- Examination arrangements
- Student-student interactions
- Students' Union activities
- Individuals who are under the age of 18 at the start of their studentship or employment with the institution
- Provision of work experience to people who are under the age of 18
- Research involving sensitive materials or people who are under the age of 18 and for adults at risk
- Lectures and presentations from guest speakers

## **Principles**

4. The safeguarding and protection of children and adults at risk is the shared responsibility of all staff and students of the University.

5. Children and adults at risk should be free to learn, work and develop their potential, without fear of violence, abuse or exploitation. Within the University of Suffolk, children and adults at risk, irrespective of their protected characteristics as defined by the Equality Act 2010, will be valued and their rights to protection and safety fully respected.

6. The University will take all reasonable steps to establish that those whose work or study involves contact with at risk individuals do not present an unacceptable risk. This commitment is reflected in relevant University of Suffolk People and Organisational Development (POD) policies including recruitment processes for staff and, for the students, in the Admissions Policy and General Regulations for Students.

7. The University, in working with its partners, ensures that its safeguarding policies and practices align to the guidance and procedures available from:

- Suffolk Multi-Agency Safeguarding Hub
- Suffolk Safeguarding Partnership
- Suffolk Prevent Delivery Group

8. All suspicions and allegations of abuse or inappropriate behaviour will be taken seriously by the University and responded to appropriately as set out in this policy. (Appendix 1 provides an illustrative list of types of abuse and signs of abuse).

9. The University's duty of care will be reflected in its disciplinary procedures for students and staff.

10. The Policy will be kept up to date and periodically reviewed to ensure that any changes in legislation or guidance are taken into account.

### **Minimising risks of harm**

11. All the University's staff and those staff employed by our Partners will be made aware of the University's commitment to the safeguarding/protection of at risk groups and be directed to the Policy and Code of Conduct through induction processes and the corporate development programme, and will know what to do if a concern arises. Support and advice will be provided to staff if/when such matters arise by the Designated Safeguarding Officers and/or Local Safeguarding Officers.

12. The University of Suffolk recognises the benefits and opportunities technologies offer to teaching and learning. We provide internet access to all students and staff and encourage the use of technologies. However, the accessibility and global nature of the internet and different technologies available require students and staff to identify and manage risks and challenges associated with such use and know where to refer concerns.

13. The University recognises that online and digital platforms and social media are increasingly being used to perpetrate abuse, coercion and control. The University of Suffolk takes all forms of abuse seriously including technology-facilitated abuse.

14. All students and staff should be aware of the risks when taking, downloading and posting images, video or audio online and making them available to others. There are particular risks where personal images, videos or audio clips of themselves or others are posted onto social networking sites, for example. The University will provide opportunities to students to gain information on the appropriate use of images, video and audio at induction and as part of the curriculum. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

15. No image, photograph, video or audio clip of an individual or group can be copied, downloaded, shared or distributed online without permission from the subject(s) or copyright holder. Photographing, recording or videoing activities on University premises should be considered carefully; staff members are encouraged to notify participants of the likelihood of their photograph being taken or them featuring in videos or audio clips. Photographs, videos or audio clips approved for use should not include names of individuals without additional, appropriate consent.

16. The University will make all reasonable efforts to ensure that all members of its staff whose role involves 'regulated' or 'controlled' activity with students under the age of 18 and/or adults at risk are suitable for the position and have completed the necessary checks including Disclosure and Barring Service checks and, if appropriate, registration with the relevant external agency.

17. All students whose study involves work placements in settings where there are at risk individuals must satisfy all reasonable requirements including Disclosure and Barring Service checks and, if appropriate, registration with the relevant external agency.

18. All students who are employed and undertake regulated activities with at risk individuals on University of Suffolk activities are required to undertake a Disclosure and Barring Service check. It is noted that students employed by the University are employees of the University of Suffolk.

19. All students will be made aware of the University's commitment to the safeguarding and protection of at risk individuals and the Safeguarding Code of Conduct, and understand that any legitimate suspicions or concerns will be reported to appropriate agencies. Breaches of the Code of Conduct may lead to disciplinary action under the Student Disciplinary Policy. Students studying health, social work or other professional programmes are in a position of trust and as such, any breach may be reported to the professional/regulatory body.

20. The Admissions Office at the point of admission to a programme of study will ensure that the parents or guardians of students who are under the age of 18 are aware that their child is studying alongside adults in a higher education environment which is not as regulated and supervised as a school or Further Education (FE) College environment.

21. All students under the age of 18 enrolling with the University will be given guidance and pastoral support by Student Life and their course team. Please see the Under 18 Policy for more

information.

22. The University will work in partnership with the Students' Union to promote the safeguarding and protection of at risk groups.

23. The University will work closely with schools and parents to ensure confidence that the organisation is providing a safe environment for their children under the age of 18.

24. No images in any format will be circulated or stored involving young students, school pupils, visitors under 18, or vulnerable adults without first gaining explicit written informed consent of those involved and their parents/guardians/carers.

25. Detailed and accurate written records of referrals/concerns will be kept securely and confidentially when concerns arise, in line with the relevant statutory requirements and the University's Data Protection Policy.

**Action when work or study involves contact with at risk groups and conditions or circumstances present an unacceptable risk**

26. There are occasions where a circumstance or a condition applied to an individual may prevent them from being a member of an organisation such as the University of Suffolk. Examples may include but are not limited to:

- Information shared through DBS vetting and barring procedures
- Information shared by a Local Authority Designated Officer (LADO), Police or Public Protection Unit
- Conditions applied through a Public Protection Order
- Certain criminal convictions and sentences

27. Circumstances or conditions applied to a person that prevent them from being a member of the University or from having contact with at risk individuals, must be referred to a Designated or Local Safeguarding Officer.

**Action on occurrence or suspicion of abuse**

28. Abuse can take different forms and includes physical abuse, sexual abuse, emotional abuse as well as neglect and bullying. Abuse can have serious and long term effects in terms of development, health and wellbeing including to self-esteem and self-image.

29. Although the University's staff have no powers to investigate abuse, all have responsibility

for reporting any suspicions or concerns of abuse and for ensuring that concerns are taken seriously.

30. The University is committed to cooperating closely with appropriate external agencies.

31. Those reporting suspicions or concerns must follow the protocols set out below, the most significant of which is to seek the advice of the University's Designated Safeguarding Officers or local School/Department/Partner College Safeguarding Officer as soon as possible.

**Procedure for dealing with allegations of abuse against people who work with children or those who are in a position of trust or suspicions of abuse against an employee of the University of Suffolk at work (Ipswich campus) or against a student of the University of Suffolk**

32. The Designated Safeguarding Officer or local Safeguarding Officer who receives a report of an allegation should immediately seek the advice of the relevant Local Authority Designated Officer (LADO) and/or Position of Trust (POT) team. The LADO or POT team will advise whether a strategy meeting is required before the member of staff or student can be informed of the allegation. This is a precaution in case a Police or social work investigation is prejudiced.

33. In the case of a University employee, the relevant line manager and the Director of People and Organisational Development should also be informed of the position. (In the absence of the relevant line manager, a member of the Executive Team should be notified). In the case of a student, the relevant Dean of School or Deputy Vice-Chancellor should be informed.

34. If the LADO or Position of Trust team advises that it is appropriate, the line manager (of employee) or Dean of School (of student) should meet with the employee/student concerned to inform him/her that an allegation has been made and also explain the course of action that needs to be taken. It should be clear to the employee that this meeting is not an investigatory meeting or disciplinary hearing.

35. Possible outcomes may include the following:

- There is immediate referral to agencies responsible for safeguarding/protection to deal with the matter. This will take priority over any internal process. (The Designated Safeguarding Officer or local Safeguarding Officer will be responsible for liaising with relevant safeguarding agencies)
- There is reason to suppose abuse may have occurred and further investigation by a safeguarding agency or under the University of Suffolk Staff/Student Disciplinary

Procedures may be necessary

- The allegation is prompted by inappropriate behaviour by an employee/student which needs to be considered under the University Staff/Student Disciplinary Procedures
- That the allegation is without foundation and does not warrant further investigation

36. Where safeguarding concerns and allegations of abuse call for immediate referral to safeguarding agencies:

- A risk assessment and need for interim action (e.g. suspension) will be conducted (see paragraph 45 to 50)
- Subsequent action taken will be in accordance with the procedures and actions identified by the respective Safeguarding Board or Channel Panel.
- The Designated Safeguarding Officer or local Safeguarding Officer will not be part of the investigating team but s/he will be expected to contribute to discussions on how the investigation will be conducted
- The Designated Safeguarding Officer or local Safeguarding Officer will liaise closely with the agencies to obtain information on the progress of the investigation and update the Director of HR or Dean of School /Deputy Vice-Chancellor as appropriate.

37. The University will be able to conduct an internal investigation, however, investigation by the Police or safeguarding agencies will take priority. The internal investigation will commence after the safeguarding agencies or Police have completed their investigations. The University will keep the investigation of all complaints and the records relating to the matter confidential.

38. When it is appropriate to do so, the allegation will be investigated in accordance with the pertinent University disciplinary procedure. As a precautionary measure, and without prejudice to the outcome, the Director of POD (for staff) and the Vice-Chancellor (for students) may decide to suspend the employee/student pending the outcome of any investigation (see also paragraph 48).

### **Action on occurrence or suspicion/concern regarding radicalisation**

39. Those who have concerns or have had concerns expressed to them in relation to any person who may be at risk of being drawn into or vulnerable to radicalisation should raise this at the earliest opportunity with the Designated Safeguarding Officer or Local Safeguarding Officer.

40. The Designated Safeguarding Officer or Local Safeguarding Officer who receives a report of an allegation should follow the relevant Prevent Channel Referral process.

41. In the case of a University employee, the relevant line manager and the Director of POD

should be informed of the position. (In the absence of the relevant line manager, a member of the Executive Team should be notified.) In the case of a student the relevant Dean of School should be informed.

#### **Procedure for dealing with concerns of possible abuse outside the University of Suffolk**

42. If someone is concerned about an incident which has occurred outside the University s/he is required to raise the matter with the Designated Safeguarding Officer or relevant local Safeguarding Officer who will inform the appropriate service and ensure that appropriate procedures are followed.

#### **Procedure for dealing with a safeguarding concern or allegation of abuse by an individual of an external organisation using the University of Suffolk facilities**

43. If an allegation of abuse is made against an employee from an external organisation using the University of Suffolk facilities, a referral must be made as above in 28. Additionally, if a safeguarding concern is raised under the remit of the CTSA 2015 and Prevent Duty guidance, a referral must be made as above in 28.

44. The Designated Safeguarding Officer or local Safeguarding Officer will consider in consultation with the Vice-Chancellor or relevant Principal whether the external organisation will be permitted to continue to use the University of Suffolk premises or facilities.

#### **Procedure for interim risk assessment and identifying action to minimise risk**

45. Where an allegation or concern has been raised against an employee or student of the University, following the immediate steps outlined in paragraphs 28 to 38, the Designated Safeguarding Officer will convene a Safeguarding Panel to carry out a risk assessment. The Panel will be comprised of the Designated Safeguarding Officer, the Dean of School/line manager or representative, and a representative from the Department of People and Organisational Development (POD) (for employees) or a member of the Office for Student Appeals, Complaints and Conduct (for students).

46. The role of the Panel is to take a reasonable view of the risk the employee or student poses to the University and those with whom they will come into contact as part of their University activities, including external stakeholders (such as placement providers) and service users, and assess whether they pose an unacceptable risk.

47. The Panel will consider all the evidence available to assess the risk, taking into account:

- the employee's field of work/student's programme of study



- the nature of the allegation/concern
- the seriousness of the allegation/concern
- the circumstances surrounding the allegation/concern.

48. The Panel may decide:

- a) that the employee or student be allowed to continue with their University activities;
- b) that the employee or student be allowed to continue with their University activities with certain conditions and/or restrictions pending the outcome of any investigations;
- c) that a recommendation is made to the Director of People and Organisational Development (for staff) or Vice- Chancellor (for students) to suspend the employee or student pending the outcome of any investigations.

49. The Panel will make a record of the reasons for their decision to be retained in accordance with paragraph 51 below.

50. This procedure will also apply where the University is notified that an enrolled student has a previously undeclared criminal conviction, restriction and/or probation order.

### **Record keeping**

51. All documents relating to an allegation against an employee will be returned to the Department of People and Organisational Development to be kept in the employee's personal file when the case has been concluded. If the allegation was found to be false or without foundation, no record will be kept in the employee's file except when the employee requests this. All records relating to an allegation against a student will be returned to the Academic Registrar when the case has been concluded. If the allegation was found to be false or without foundation, no record will be kept in the student's file except when the student requests this. It will be for the relevant agency to keep records of referrals made to it in accordance with statutory requirements.

### **Monitoring and evaluation**

52. The Designated Safeguarding Officer will coordinate the recording of any incidents relating to the protection of at risk groups at the University of Suffolk (Ipswich) and report them to the Executive Team on an annual basis. This will be confidential and if any concerns or patterns emerge these will be dealt with appropriately.

### **Management framework**

53. The Designated Safeguarding Officer will have overall responsibility to safeguard and protect at risk individuals, as set out in paragraph 2.

54. In addition, Local Safeguarding Officers will be responsible for keeping up to date with safeguarding matters, particularly as they relate to any specialised areas of provision. These local officers will be the people to whom reports or suspicions of abuse are referred in the first instance.

55. A Safeguarding Group will meet not less than once a year, chaired by the Designated Safeguarding Officer. The Group will report annually to the University of Suffolk Executive. The Group will include the following membership:

- Academic Registrar (Designated Safeguarding Officer), Chair
- Director of People and Organisational Development
- Deputy Vice-Chancellor
- Assistant Director of Student Life
- Deans of School Local Safeguarding Officers including representative/s from the University of Suffolk's Partner Colleges
- Representative/s from the Students' Union Student Centre Manager
- Schools Recruitment Officer
- Representative from Business Engagement and
- Entrepreneurship Representative/s from Suffolk
- Safeguarding Partnership Safeguarding Board
- Representative/s from Suffolk Constabulary
- Representative from Prevent
- Representative from Multi Agency Safeguarding Hub (MASH)

56. The remit of the Group will be:

- To have oversight of all safeguarding matters and issues relating to protection within the University and to assist the Designated Safeguarding Officer in fulfilling the University's responsibilities as outlined in this policy.
- To ensure and quality assure the implementation of this policy.
- To keep the policy and code of conduct up to date, taking account of changes in legislation, and reviewing and auditing practice as agreed appropriate.
- To review best practice in the higher education sector as a whole and guidance issued by Government or other agencies.
- To ensure accessibility to and ownership of the policy and code of conduct by all staff and students of the Institution.
- To give advice to staff as requested in order to ensure consistency of approach.
- To create a safe culture within the University by sharing learning about best practice and

promoting awareness about safeguarding and protection issues.

- To monitor and oversee matters relating to the safeguarding and protection of at risk groups.
- To ensure that clear strategies are developed in respect of safeguarding and protecting, and that they are coordinated and implemented consistently across the University, in a way which anticipates and responds to external and internal developments and ensures that the University can be accountable for safeguarding individuals at risk. To ensure a clear organisational focus on risk management.
- To ensure appropriate and proportionate action is taken in respect of identified risks or concerns and to ensure any learning is shared from matters arising.
- To receive and review the annual report on activity and training undertaken.

## **APPENDIX 1**

### **SAFEGUARDING: CODE OF CONDUCT**

#### **Introduction**

1. This Code of Conduct should be considered in conjunction with the University of Suffolk's Safeguarding Policy and reflects the importance the University attaches to the safety and protection of children, young people and vulnerable adults.

#### **Code of behaviour and good practice**

2. All children and adults at risk should be treated with respect.

3. All activities with children and adults at risk should have more than one adult present or at least one that is within sight or hearing of others.

4. All activities should respect the right to personal privacy.

5. In all activities, staff are required to be aware that physical contact with a child or adult at risk may be misinterpreted.

6. In all activities, staff should recognise that special caution is required when discussing sensitive issues with children or adults at risk.

7. Any physical or manual touching required should be provided openly and if this is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body.

8. In activities, feedback should be constructive rather than negative.

9. In all activities, staff are required to challenge unacceptable behaviour.

10. Any allegations or suspicions of abuse should be reported immediately to the relevant Local Safeguarding Officer or the Designated Safeguarding Officer.

11. In all dealings with children or adults at risk, staff should never:

- Play rough physical games or sexually provocative games
- Share a room with a child or adult at risk
- Enter a private room (e.g. bedroom) unless it is absolutely necessary, and if entering a

room must do so accompanied

- Allow or engage in any form of inappropriate touching
- Allow children or adults at risk to use inappropriate language without challenging it
- Make sexually suggestive comments even in jest
- Reduce a child or adult at risk to tears as a form of control
- Allow safeguarding concerns or allegations of abuse to go unchallenged, unrecorded or not acted upon
- Do personal things for a child or adult at risk which they can do for themselves. If a child or adult at risk has a disability any tasks should only be performed by a dedicated support worker, in accordance with recommendations made in a relevant care plan and with the full understanding and consent of the parents/guardians/carers.

### **Examples of what should be reported/recorded**

12. Any incidents which cause concern in respect of at risk individuals are required to be reported immediately to the Local Safeguarding Officer or Designated Safeguarding Officer. Below are examples of incidents which should be reported:

- A child or adult at risk is accidentally hurt
- There is concern that a relationship is developing which may be an abuse of trust
- You are worried that a child or adult at risk is becoming attracted to you
- You are worried that a child or adult at risk is becoming attracted to a colleague who cares for them
- You think a child or adult at risk has misunderstood or misinterpreted something you have done
- You have been required to physically restrain a child or adult at risk to prevent them from harming themselves or another or from causing significant damage to property
- You receive a report or disclosure alleging abuse regarding a member of an external organisation using the University of Suffolk facilities
- You see suspicious marks on a child or adult at risk
- You hear of any allegations made by a child or adult at risk of events outside the University of Suffolk
- You are concerned that an individual is being influenced or radicalised by any extremist group or ideology
- You find material (via either online or physical environments) whereby the content constitutes a safeguarding concern
- You are concerned that an individual or organisation is inciting hatred or violence
- You believe that an individual, although not implicated, should be removed from the risk

## **Recognition of abuse**

13. The University of Suffolk recognises that its staff may not be familiar with working with children, adults at risk or individuals who may be vulnerable to radicalisation and may not be in a position to recognise abuse. If you are not familiar with working with individuals who may be at risk of abuse, you can receive some basic knowledge by undertaking training provided by the University. This will allow you to be aware of the various types of abuse and also to identify the different cultural contexts of behaviour.

14. The list below offers examples of types of abuse; abuse can intersect or include more than one form. We also recognise that online and digital platforms and social media are increasingly being used to perpetrate abuse. The list is illustrative and is not limited exclusively to the following:

- Physical abuse
- Sexual abuse
- Sexual exploitation and trafficking
- Psychological / emotional abuse
- Neglect
- Financial abuse
- Coercion / control / grooming
- Abuse that may be specific to a local area or population, for example gang activity and youth violence, criminal exploitation, including county lines
- Radicalisation and/or extremist behaviour
- Domestic Abuse
- Modern slavery
- Female Genital Mutilation (FGM)
- So called honour-based abuse
- Forced marriage
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence
- Fabricated or induced illness
- Other abuse not listed here but that pose a risk to students and at risk groups.

15. It is not the place of staff or students to make a judgement about whether abuse has occurred. This is the remit of the relevant safeguarding agencies.

16. Abuse can occur within any setting and abusers may seek to use community and voluntary

organisations to gain access to at risk individuals.

17. There may be indicative signs of abuse which may include, but are not limited to the following:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally
- An injury for which there may be an inconsistent explanation
- Descriptions of an abusive act or situation
- Unexplained changes in behaviour
- Inappropriate sexually explicit behaviour or sexual awareness
- Unexplained changes in mood or emotional state
- A distrust of others
- The child or adult at risk is not allowed to be involved in normal social activities
- Showing support for violence or terrorism
- Unkempt in appearance, showing signs of neglect or self-neglect
- Use of technology or social media, for example use of forums / platforms and risk of being groomed online for exploitation or radicalisation

### **Procedure for reporting**

18. If a disclosure of abuse is made or an at risk individual acts in a way where abuse is suspected the person receiving the information is required to:

- React in a calm and considered way but should show concern
- Tell the person making the disclosure that it is right for them to share this information and that they are not responsible for what has happened
- Take what has been said seriously
- Only ask questions to ascertain whether there is a concern but not interrogate
- Listen and not interrupt them if they are recounting significant events
- Not give assurances of confidentiality but explain you will need to pass on this information to those that need to know
- Make a comprehensive record of what is said and done as soon as possible and before leaving work. Keep all original notes as they may be needed as evidence.

19. The comprehensive record should include the following:

- A verbatim record of the account of what occurred in their own words. You should note this record may be used later in a criminal trial and therefore needs to be as accurate as possible

- Details of the nature of the allegation or concern
- A description of any injury; please note that you must not remove clothing to inspect any injuries

20. The incident, allegation or concern should be reported immediately to your Local Safeguarding Officer or the Designated Safeguarding Officer (email: [safeguarding@uos.ac.uk](mailto:safeguarding@uos.ac.uk) or telephone: 01473 338400) for appropriate action to be taken. If the concerns relate to the Safeguarding Officers themselves then a concern must be referred directly to the Police or Local Authority Designated Safeguarding Officer (LADO), as appropriate.

21. It is the remit of the Local Authorities and/or the Police and not anyone connected with the University of Suffolk to investigate allegations or suspicions of abuse.