

## 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, vulnerable adults and others who study, work at and visit the Institution.

### Scope

2. This policy applies to all University students and staff employed by the Institution, staff employed at the partner colleges in the University of Suffolk Learning Network who teach on University of Suffolk programmes (*although please see \**), and volunteers, who may be working with the following groups whom the Institution encounters through its teaching and research activities as well as through its outreach programmes:

- children and young people aged under 18
- vulnerable adults (as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006) and/or those persons aged over 18 who by reason of mental or other disability, age or illness are or may be unable to take care of themselves or are or may be unable to protect themselves against significant harm or exploitation
- any persons, who may be at risk of being adversely influenced or radicalised by any extremist group or ideology under the terms of the Governments Prevent Strategy as defined in the *Prevent duty guidance*, December 2014

3. The policy has particular relevance to the following areas of activity:

- 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
- Additional requirement and special needs assessment processes
- Selection and recruitment of staff

---

*\* Staff who teach on University of Suffolk programmes at partner colleges in the University of Suffolk Learning Network 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.*

- 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
- Employment of staff who are under the age of 18
- Provision of work experience to people who are under the age of 18
- Research involving people who are under the age of 18 and for vulnerable adults
- Lectures and presentations from guest speakers

### **Principles**

4. This policy applies to all children, young people and vulnerable adults with whom the University of Suffolk has contact, including people who are under 18 years of age at the start of their studentship or at the start of their employment with the Institution; children, young people and vulnerable adults with whom University students come into contact in work placement settings as part of their programme of study; research participants; and visitors to any of the Institution's campuses who are under 18 years of age or who may be deemed to be vulnerable adults. The scope of this policy is extended to include those who may be vulnerable to radicalisation (VTR) as described in Government's Prevent Strategy.

5. The safeguarding and protection of children, young people and vulnerable adults is the shared responsibility of all staff and students of the Institution.

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

7. The Institution will take all reasonable steps to establish that those whose work or study involves contact with children, young people and/or vulnerable adults do not present an unacceptable risk to the wellbeing of the children, young people and vulnerable adults concerned. This commitment is reflected in relevant University of Suffolk Human Resource (HR) policies including recruitment processes.

8. The institution, in working with its partners, ensures that its Safeguarding policies and practices align to the Suffolk Safeguarding Children Board policies, <http://www.suffolkscb.org.uk/procedures/lscb-policies-guidance-and-protocols/>

9. All suspicions and allegations of abuse or inappropriate behaviour will be taken seriously by the Institution and responded to appropriately as set out in this policy.

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

11. 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**

12. All the Institution's staff and those staff employed by members of the wider University of Suffolk Learning Network will be made aware of the Institution's commitment to the safeguarding/protection of children, young people and vulnerable adults and be directed to the Policy and Code of Conduct through induction processes and the corporate development programme, and 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 Officer and/or Local Safeguarding Officers.

13. The Institution 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 vulnerable adults 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.

14. All students whose study involves work placements in settings where there are children, young people or vulnerable adults must satisfy all reasonable requirements including Disclosure and Barring Service checks and, if appropriate, registration with the relevant external agency.

15. All students who are employed to work with children, young people or vulnerable adults on University of Suffolk activities are required to undertake a Disclosure and Barring Service check. It is noted that students employed by the Institution are employees of the University of Suffolk.

16. All students will be made aware of the Institution's commitment to the safeguarding/protection of children, young people and vulnerable adults and 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 Professional programmes are in a position of trust and as such, any breach may be reported to the professional/regulations body.

17. The Admissions Office at the point of admission to a programme of study will ensure that the parents or carers 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 FE College environment.

18. All children and young people enrolling with the Institution will be given guidance and reassurance by their tutor at the point of induction about how to keep safe in all aspects of their studies, including in face-to-face tutorials, work placements, field trips and residential student accommodation.

19. The Institution will work in partnership with the Students' Union to promote the safeguarding and protection of children, young people and vulnerable adults.

20. The Institution will work closely with schools and parents to ensure confidence that the organisation is providing a safe environment for their children and young people.

21. 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.

22. 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 on occurrence or suspicion of abuse**

23. 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.

24. Although the Institution's staff have no powers to investigate abuse, all have responsibility for reporting any suspicions or concerns of abuse and for ensuring that the child, young person or vulnerable adult is being taken seriously.

25. The Institution is committed to cooperating closely with appropriate external agencies.

26. Those reporting suspicions or concerns must follow the protocols set out below, the most significant of which is to seek the advice of the Institution's Designated Safeguarding Officer or local Faculty/Department or University of Suffolk Learning Network Safeguarding Officer as soon as possible.

**Procedure for dealing with allegations or suspicions of abuse against an employee of University of Suffolk at work (Ipswich campus) or against a student of the University of Suffolk**

27. 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) (children) or Adult Safeguarding Manager (ASM) (vulnerable adults). The LADO/ASM will advise whether a strategy meeting of all concerned bodies 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.

28. In the case of a University employee, the relevant line manager and the Director of HR 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 Head of Department or Pro-Vice-Chancellor should be informed.

29. If the LADO or ASM advises that it is appropriate, the line manager (of employee) or Head of Department (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.

30. Possible outcomes may include the following:

- There is immediate referral to child/vulnerable adult protection agencies 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 Children and Young People Services/Adult and Community Services and other relevant agencies)

- There is reason to suppose abuse may have occurred and further investigation by a child/vulnerable adult protection 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

31. Where allegations of abuse call for immediate referral to child/vulnerable adult protection agencies:

- Subsequent action taken will be in accordance with the procedures established by the Local Safeguarding Children's Board (LSCB) – a statutory committee or its equivalent for vulnerable adults or persons vulnerable to radicalisation
- 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 Head of Department/Pro-Vice-Chancellor as appropriate.

32. The Institution will be able to conduct an internal investigation. However, investigation by the Police or child/vulnerable adult protection agencies will take priority. Internal Institutional investigation will commence after the child/vulnerable adult protection agencies or Police have completed their investigations. The Institution will keep the investigation of all complaints and the records relating to the matter confidential.

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

#### **Action on occurrence or suspicion of vulnerability to radicalisation**

34. 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.

35. The Designated Safeguarding Officer or Local Safeguarding Officer who receives a report of an allegation should contact the Multi Agency Safeguarding Hub (MASH).

36. In the case of a University employee, the relevant line manager and the Director of HR 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 Head of Department should be informed.

### **Record keeping**

37. All documents relating to an allegation against an employee will be returned to HR 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**

38. The Designated Safeguarding Officer will coordinate the record of any incidents relating to child and vulnerable adult protection 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.

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

39. 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 an allegation of abuse by an individual of an external organisation using the University of Suffolk facilities**

40. If a child or vulnerable adult alleges abuse by an employee from an external organisation using the University of Suffolk facilities, a referral must be made as above in 26.

41. 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.

## Management framework

42. The Designated Safeguarding Officer will have overall responsibility to safeguard and protect young children and vulnerable adults in accordance with relevant and current legislation.

43. In addition, Local Safeguarding Officers will be responsible for keeping up to date with safeguarding and child and vulnerable adult protection developments, 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.

44. 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 Human Resources

Pro-Vice-Chancellors

Head of Student Services

Heads of Department

Local Safeguarding Officers including representative/s from the University of Suffolk Learning Network

Representative/s Students' Union

Infozone Manager

Schools Recruitment Officer

Representative from Research and Enterprise Services

Representative/s from Local Safeguarding Children Board

Representative/s from Adult Safeguarding Board

Representative/s from Suffolk Constabulary

Representative from Prevent

Representative from Multi Agency Safeguarding Hub (MASH)

45. The remit of the Group will be:

- To have oversight of all safeguarding matters and issues relating to protection within the Institution and to assist the Designated Safeguarding Officer in fulfilling the Institution'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 Institution 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 children, young people and vulnerable adults and persons vulnerable to radicalisation.
- To ensure that clear strategies are developed in respect of safeguarding and protecting, and that they are coordinated and implemented consistently across the Institution, in a way which anticipates and responds to external and internal developments and ensures that the Institution can be accountable for safeguarding and protecting children, young people and vulnerable adults.
- To ensure a clear organisation 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 Institution attaches to the safety and protection of children, young people and vulnerable adults.

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

2. All children, young people and vulnerable adults should be treated with respect.
3. All activities with children, young people and vulnerable adults should have more than one adult present or at least one that is within sight or hearing of others.
4. All activities should respect a young person's or vulnerable adult's right to personal privacy.
5. In all activities, staff are required to be aware that physical contact with a child, young person or vulnerable adult may be misinterpreted.
6. In all activities, staff should recognise that special caution is required when discussing sensitive issues with children, young people or vulnerable adults.
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, young people or vulnerable adults, staff should never:
  - Play rough physical games or sexually provocative games
  - Share a room with a child, young person or a vulnerable adult

- Enter a child's, young person's or vulnerable adult's room 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, young people or vulnerable adults to use inappropriate language without challenging it
- Make sexually suggestive comments even in jest
- Reduce a child or vulnerable adult to tears as a form of control
- Allow allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon
- Do personal things for a child, young person or vulnerable adult which they can do for themselves. If a child, young person or vulnerable adult has a disability any tasks should only be performed 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 a child, young person or vulnerable adult 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, young person or vulnerable adult is accidentally hurt
- There is concern that a relationship is developing which may be an abuse of trust
- You are worried that a child, young person or vulnerable adult is becoming attracted to you
- You are worried that a child, young person or vulnerable adult is becoming attracted to a colleague who cares for them
- You think a child, young person or vulnerable adult has misunderstood or misinterprets something you have done
- You have been required to physically restrain a child, young person or vulnerable adult to prevent them from harming themselves or another or from causing significant damage to property
- You receive a report from a child, young person or vulnerable adult alleging abuse regarding a member of an external organisation using the University of Suffolk facilities
- You see suspicious marks on a child, young person or vulnerable adult
- You hear of any allegations made by a child, young person or vulnerable adult of events outside the University of Suffolk
- You are concerned that a person, child or adult, is being influenced or radicalised by any extremist group or ideology

- You believe that a person, child or adult, 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, young people or vulnerable adults and may not be in a position to recognise abuse. If you are not familiar with working with children, young people or vulnerable adults you can receive some basic knowledge by undertaking training provided by the Institution. This will allow you to be aware of the various types of abuse and also to identify the different cultural contexts of behaviour.

14. It is not the place of staff or students to make a judgement about whether abuse has occurred. This is the remit of Children and Young People Services/Adult & Community Services.

15. Abuse can occur within any setting and abusers may seek to use community and voluntary organisations to gain access to children, young people or vulnerable adults.

16. There may be indicative signs of abuse which include:

- 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 either from an adult, child or young person
- The child, young person or vulnerable adult describes an abusive act or situation
- Unexplained changes in behaviour
- Inappropriate sexually explicit behaviour or sexual awareness
- A distrust of adults
- The child, young person or vulnerable adult is not allowed to be involved in normal social activities

### **Procedure for reporting**

17. If a child, young person or vulnerable adult says something or acts in a way that abuse is suspected the person receiving the information is required to:

- React in a calm and considered way but should show concern
- Tell the child, young person or vulnerable adult that it is right for them to share this information and that they are not responsible for what has happened
- Take what the child, young person or vulnerable adult has said seriously

- Only ask questions to ascertain whether there is a concern but not interrogate the child, young person or vulnerable adult
- Listen to the child, young person or vulnerable adult 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.

18. The comprehensive record should include the following:

- A verbatim record of the child's, young person's or vulnerable adult's 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

19. The incident, allegation or concern should be reported immediately to your Local Safeguarding Officer or the Designated Safeguarding Officer 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 Children and Young Peoples' Services/Adult & Community Services as appropriate.

20. It is the remit of Social Services (and/or the Police) and not anyone connected with the University of Suffolk to investigate allegations or suspicions of abuse as detailed in Section 47 of the Children Act 1989 and the Safeguarding Vulnerable Groups Act 2006.