



<b>Document Title:</b>	Code of Practice for Safeguarding Children and at-risk adults
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## 1. Introduction

1.1. The University is committed to maintaining the highest standards to protect and safeguard those individuals for whom it has responsibility. This Code of Practice is designed to protect both those in a position of trust, and those for whom they have responsibility. It provides procedures to follow where there is concern for a child or an at-risk adult's welfare, including where an allegation is made about a member of the University. It also provides information to ensure that members of the University do not put children or at-risk adults in a vulnerable position.

### Responding to safeguarding concerns

1.2. The University's Registrar, (see annex 8 for contact details) is the Designated University Safeguarding Coordinator. They are responsible for overseeing all safeguarding issues relating to the University and its members. The Registrar is the lead officer for the implementation of this code of practice. If the University Safeguarding Coordinator is not available to assist with an urgent concern, those named in 9.2 and 9.3 should be contacted.

1.3. **Where there is a potential safeguarding concern it should be brought to the University Safeguarding Coordinator's attention as soon as possible following section 9.2 or 9.3 of this document. Flow charts mapping out actions around safeguarding concerns are provided in Annex 6 and 7 for reference.** Additional procedures are included in this code of practice which provide specific instructions for reporting safeguarding concerns in different scenarios in sections 9-19.

1.4. The University Safeguarding Coordinator's role (or the role of those deputising for them – see 9.2 and 9.3) is to assess the information they have available to them about suspected safeguarding issues, and to make a judgement on whether referral should be made to an external agency. The University will not investigate safeguarding concerns; that is the responsibility of the Local Authority under Section 47 of the Children Act 1989, unless the University is instructed to do so by the Local Authority under the provisions of the Care Act 2014. Contact with such bodies may be undertaken by the University Safeguarding Coordinator, the Governance, Compliance and Operations Manager (see annex 8 for contact details), or other members of staff nominated by the by the University Safeguarding Coordinator, where necessary.

## 2. Definitions

2.1. A member of the University includes any member of the staff of the University or Students' Union, University Council member or University Council Committee Member, and any student of the University.

2.2. A 'child' or 'children' refers to an individual or individuals under the age of 18 years (Children Act 1989).

2.3. As defined within the Care Act 2014, an at-risk adult is a person the Local Authority has reasonable cause to suspect has need for care and support (whether or not the authority is meeting any of those needs), is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect themselves against abuse or neglect, or the risk of it.

2.4. Definitions of types of abuse and signs of abuse are provided in Annex 1. Guidance on

minimising risk around safeguarding is included with Annex 3, all members of the University should familiarise themselves with this guidance.

### **3. Principles**

- 3.1. All members of the University are responsible for helping to prevent abuse by having a clear understanding of their responsibilities under this code of practice, and for reporting any suspicions they may have using the processes defined in this document (see section 9-19 for reporting procedures).
- 3.2. Visiting staff and contractors should be aware of this Code of Practice and must comply with it.
- 3.3. Members of the University must take care to avoid situations where allegations of abuse could be made.
- 3.4. Any allegation or suspicion that a child or at-risk adult has been subjected to abuse will be taken seriously and addressed swiftly and appropriately.
- 3.5. Support is available from the University to any of its members who report safeguarding concerns, through HR, BGSU, Student Advice, or the Chaplaincy.
- 3.6. Any internal disciplinary investigations into the conduct of a member of the University will be conducted following the conclusion of any external investigations conducted by the Police and/or Social Services, or any other relevant body. However, where appropriate, members of the University may be excluded or suspended pending the outcome of an external investigation.
- 3.7. Prior to taking part in any aspect of a BGU activity involving contact with children or at-risk adults, University Members must be aware of their responsibilities in regards to safeguarding.
  - 3.7.1. Where a student is on a relevant placement, they must be provided with a copy of the placement provider's own safeguarding procedures, if they are not they must take steps to ensure they receive it before they have contact with children or at-risk adults in the placement context. Students should make the University aware if a placement provider has not made their Safeguarding Policy available to them.
  - 3.7.2. Research carried out by BGU members under its jurisdiction must be conducted in accordance with this Code of Practice.
- 3.8. The University may take advice from the Local Authority Designated Officer (LADO) or the police regarding the handling of general or specific safeguarding concerns (see Annex 8 for contact details).
- 3.9. The University's practice around safeguarding will be in accordance with all relevant laws and legislation, including those relevant to Data Protection, and the Equality Act 2010.

### **4. Scrutiny and checks**

- 4.1. The University will take appropriate practicable measures to prevent unsuitable people from

working with children or at-risk adults within its jurisdiction. These measures may include, but are not limited to: recruitment and admissions practices (e.g. DBS checks); Occupational Health Assessments; induction procedures; placement procedures; reporting mechanisms and training.

4.2. University members who come into contact with children or at-risk adults must provide evidence of appropriate checks (e.g. DBS) returns to the University on request, where the University decides the nature of the members' contact with children or at-risk adults merits it. This is likely to include a basic disclosure from the DBS, as a minimum. For those with pastoral or tutorial responsibilities an enhanced disclosure will normally be required. See the University's codes of practice for DBS checks for further details. The University will review members' check returns and decide whether to permit them to have contact with children or at-risk adults under its jurisdiction.

4.2.1. Student helpers and mentors will require a DBS disclosure appropriate to the nature of their work. Where appropriate, University members will be required to arrange appropriate DBS disclosures if requested.

4.3. Students and staff must inform the University immediately of any occurrence or activity which is likely to impact upon their DBS status; this will include activity which is a safeguarding concern, such as being investigated by Social Services, or being subject to a Care Order; this also includes where someone living in a staff member or student's household is barred from working with Children under the Childcare Act 2006.

## **5. Training**

5.1. Members of the University who work with children or at-risk adults should be provided with appropriate training by the University on issues to be aware of when working with children and at-risk adults and how they should deal with any disclosure made to them.

5.2. The Designated University Safeguarding Coordinator will undertake appropriate training and will provide guidance to People and Organisational Development on training requirements for University members where required.

## **6. Data Protection**

6.1. Any information regarding safeguarding issues will be held in accordance with relevant data protection law and regulations, and the University's Record Retention Schedule.

6.2. Information relating to safeguarding disclosures will only be distributed outside of the University to Social Services, the Police, or to others where it is required by law, or where it is reasonable to do so to report or prevent harm to a child or at-risk adult.

6.3. Concerns relating to safeguarding which have not been referred to an external body will be retained in a secure location by the University for a period of one year, in accordance with the University's Records Retention Schedule. This code of practice complies with all relevant Data Protection legislation from 2008 revisions onwards, as per current law within the UK and International requirements.

## **7. Whistleblowing**

In accordance with the Public Interest Disclosure Act 1988, the University will support and protect those staff and students who in good faith and without malicious intent report suspicions of abuse or concerns about members of the University and their actions.

## **8. Exclusion**

8.1. It may be that due to the nature of allegations, the University deems it necessary to summarily exclude students under University's procedures (which is a neutral act). Such an act must be proportionate.

8.1.1. Where appropriate the academic implications of such exclusions will be communicated to students who are excluded. If a student is cleared of an allegation reasonable steps will be taken to support the student to continue their studies.

## **9. What to do if abuse is suspected**

### **9.1. Notes on reporting concerns**

#### Confidentiality

9.1.1. When a University member has their own Safeguarding concerns, or are informed of some concerns by a someone else, (e.g. visitor, student), they must not disclose this information to anyone other than the University Safeguarding Coordinator (see annex 8) or anyone deputising for them (see 9.1.2, 9.2. & 9.3).

9.1.2. When concerns are raised with the Director of People and Organisational Development (see annex 8 for contact details), Head of Quality and Regulatory Compliance, or Governance, Compliance and Operations Manager (GCOM), where possible they will refer the case back to the University Safeguarding Coordinator if they become available. However, if urgent action is needed, and should the University Safeguarding Coordinator not be available, they (HoQRC, GCOM, or Director of People and Organisational Development) will in that case seek advice from a member of BGU's Executive before taking any actions on the received information.

#### Responsibility for investigating concerns

9.1.3. **Members of the University must not carry out their own investigation into suspicions or allegations of abuse unless the University has been advised to do so in writing by Social Services**, neither should members question children or at-risk adults closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services. **Do not remove clothing to inspect physical signs of abuse.**

### **9.2. Staff reporting safeguarding concerns within office hours** (see annex 7 flowchart)

9.2.1. Staff with concerns - Concerns should be raised as soon as possible with the University Safeguarding Coordinator (See Annex 8).

9.2.2. If the University Safeguarding Coordinator is unavailable, the concerns should be raised with the Head of Quality and Regulatory Compliance (HoQRC), Governance Compliance and Operations Manager (See Annex 8) if the concern's alleged

perpetrator is a student.

- 9.2.3. If the University Safeguarding Coordinator is unavailable, the concerns should be raised with the Director of People and Organisational Development (See annex 8) if the concerns alleged perpetrator is a staff member, if they are unavailable the Chief Operating Officer should be informed.
- 9.2.4. In the event that none of the above named officers are available, any concerns should be raised with the Head of Student Advice (See Annex 8).
- 9.2.5. When reporting a concern, the annex 2 form should be filled out and passed to the person the concern is reported to.
- 9.2.6. The recipient will confirm receipt of the complaint (see 9.4). It may then be forwarded to the LADO, subject to the recipient's assessment of the case (see 9.5).

### 9.3. **Students raising concerns within office hours** (see annex 6 flowchart)

- 9.3.1. If a student has a potential safeguarding concern they should make a relevant staff member (e.g. Course leader or equivalent, Student Advice staff member) aware of their concern in confidence, as soon as possible. The staff member should then follow the 9.2 procedure.
- 9.3.2. Alternatively, students may choose to report safeguarding concerns directly to the University Safeguarding Coordinator, or in their absence the individuals listed in 9.2, as appropriate. The annex 2 form should be filled out and passed to the person the concern is reported to.
- 9.3.3. The recipient will confirm receipt of the concern (see 9.4). It may then be forwarded to the LADO (see 9.5)

- 9.4. **The Recipient normally confirms receipt of the concern within 24 hours or, should this point in time fall on a non-working/holiday day for the role holder, the receipt will be acknowledged as soon as possible after the role holder has returned to the office.** Anyone raising a concern should provide contact details so they can receive confirmation the concerns they raised have been received. Where possible, the recipient should respond to the concern during the same working day it is received.

- 9.5. **The concern is considered and may be forwarded to the LADO.** The recipient may contact the person raising the concern if further detail is required.

9.5.1. Where the recipient is the University Safeguarding Coordinator they will make a judgement on whether to refer the concerns to the Local Authority designated officer (LADO).

9.5.2. Where the recipient is an individual listed in 9.2, they will pass the concern to the University Safeguarding Coordinator if they become available. If the University Safeguarding Coordinator is unavailable, the recipient will liaise with any of the others listed in 9.2 who are available, and a Senior Leadership team member, to decide whether the LADO should be contacted. In this case, the recipient must not share the identities of those involved in the concern with the other individuals

who are consulted, unless there is a justifiable reason to do so.

**See Annex 8 for LADO contact details.**

#### **9.6. What happens if the Local Authority Designated Officer (LADO) is informed?**

Referral to the LADO may result in one, or a number of outcomes, which may include:

- a social services investigation;
- a police investigation;
- advice for the University to discipline or exclude the student or staff member;
- the concern being dismissed or referred to another organisation.

9.6.1. It is important that the 9.2, 9.3, and 9.7 activities are properly coordinated and that events are managed in the right order. For this reason, the University will take no direct action without the advice and agreement of the Police and/or the Local Authority Designated Officer/LADO, except where such action is necessary to protect a child or at-risk adult.

#### **9.7. Reporting concerns outside of office hours**

If a concern arises outside of normal office hours (evenings and weekends), and it is suspected that abuse has occurred, contact should be made with the Customer Services Centre for Social Care (see annex 8). Advice can also be sought from the NSPCC 24-hour helpline (see annex 8) or from the police. During office hours, there is also the Police Central Referral Unit number (see annex 8). In emergencies please dial 999.

### **10. Procedure for dealing with allegations or suspicion of abuse against a member of University Staff**

- 10.1. Concerns about a member of University staff should be reported using the reporting procedure included in 9.2 and 9.3. If following consideration and any preliminary investigation the concern is found clearly to be about poor practice rather than abuse, the Director of People and Organisational Development and the relevant line management may initiate the disciplinary procedure where appropriate.
- 10.2. Irrespective of the outcome of any Police and Local Authority investigations the University may consider suspension and/or disciplinary action in accordance with the disciplinary procedure.

### **11. Procedure for reporting and handling Safeguarding concerns relating to a student's conduct**

If there is a safeguarding concern about the conduct of a student within the University context (not placement) it must be reported using the procedure outlined in 9.2 or 9.3, as appropriate. The student should not be informed of the concerns until the University Safeguarding Coordinator, or in their absence another Senior Leadership Team member, gives written consent for this to take place; addressing the issue with the student too soon may compromise any necessary investigation. The LADO will advise the University on when the student may be informed. The student may only be informed of concerns whilst an investigation is ongoing where failure to do so could result in additional safeguarding concerns, e.g. if the student needs to be removed from their placement or an area of the University.

## **12. Procedure for dealing with allegations or suspicion of abuse by a student of the University on placement**

12.1. Students who suspect or are made aware of a safeguarding concern about another student whilst at the same placement setting as them must make their placement provider's designated Safeguarding Coordinator aware of the concern as soon as possible. The placement provider's Safeguarding Coordinator will then will report the concerns to the University.

12.1.1. When a placement provider becomes aware of a safeguarding concern about a student they are hosting, they must report the concern to the University using the staff procedure outlined in 9.2. In doing so, they should agree (if applicable) whether they or the University will contact the LADO or any other relevant external agency, should the issue need to be taken further. In an emergency (where a child or at-risk adult is at immediate risk of harm) the placement provider should contact the emergency services. **If a placement provider contacts the placement office to raise a safeguarding concern, they should be referred to the University Safeguarding Coordinator (see annex 8), or if they are unavailable the Head and Quality and Regulatory Compliance, or Governance, Compliance and Operations Manager (GCOM) to report the concern, or in their absence the Head of Student Advice) (see annex 8).**

12.1.2. On receiving information about the concern, the University Safeguarding Coordinator (or GCOM, or Head of Student Support, with an available BGU Executive Team member to authorise any decision) will consider the matter and decide whether an external body should be notified of the concern, and whether any of the University's other procedure (e.g. Student Disciplinary) should be initiated.

12.2. If a Student is concerned about the conduct of their placement provider (including a placement staff member's conduct) in fulfilling its responsibilities under their procedure, or the University's procedure, they should contact the University's Safeguarding Coordinator or their course leader, or equivalent.

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

As a result of their work within BGU, members of the University may become aware or suspect that a child or at-risk is being abused by someone unconnected with the University. In these circumstances the individual should report their concerns to the University Safeguarding Coordinator as outlined above in 9.2 and 9.3, or, if more appropriate to do so, contact the Police or Local Authority directly. If the concerns are about a child's welfare the Child Services Customer Service Centre should be contacted (see annex 8) during office hours. If the concerns are about an at-risk adult's welfare the Customer Service Centre should be called (see annex 8). If the concerns are out of hours for a child or an at-risk adult, the emergency duty team should be called (see annex 8).

## **14. Procedure for dealing with external organisations using University facilities**

All external organisations requesting use of University facilities for activities with children and at-risk adults will be required to sign a declaration (Annex 4) to confirm that the

organisation has obtained the appropriate checks for their staff and volunteers before they permit them to have access to children and at-risk adults. In addition, the external organisation must confirm that they have a safeguarding policy or equivalent in place before they are permitted to use the University's facilities. This includes existing users of University facilities. Existing external organisations using the University's facilities will be asked to provide their current policies and evidence of staff and volunteer checks at appropriate intervals. Where appropriate they should also be asked to include details on how safeguarding concerns may be avoided through their risk assessments. They must also be prepared to comply with University procedures around safeguarding as may be requested by the University department providing the facilities/services.

**15. Procedure for dealing with an allegation of abuse by an individual of an external organisation using University facilities**

- 15.1. A child or at risk person who is on campus in connection with an external organisation may make an allegation of abuse to a member of the University about a member of that external organisation. In this situation the member of the University must notify the University Safeguarding Coordinator following the 9.2 or 9.3 procedures, who will, in turn, report the allegation to the external organisation (unless this may compromise any investigation) and also, the Police / Local Authority where appropriate.
- 15.2. The University expects external organisations to follow their own Safeguarding Policies and following any external investigations will require confirmation that appropriate action has been taken. In addition, the University Safeguarding Coordinator (see annex 8), in consultation with the senior managers and staff of BG (Lincoln) Ltd. will consider whether it is permissible to allow the external organisation continued use of the facilities during the investigation period and beyond.

**16. Principles to follow when individuals work with children or at-risk adults in research**

- 16.1. Research supervisors must ensure that anyone (whether staff or students) working with children or at-risk adults as part of a research project they are responsible for has an appropriate DBS check where appropriate - see section 4 for guidance. People and Organisational Development and the University Safeguarding Coordinator will be able to advise on what checks may be appropriate.
- 16.2. Anyone conducting research must ensure the relevant ethics approvals have been obtained before commencing the research. Normally, informed consent should be obtained from parents/carers of children and at-risk adults where appropriate. Children and at-risk adults should normally be given the opportunity also to consent to participation.
- 16.3. Anyone conducting research should take reasonable steps to monitor the effect of their research on any child or at risk person involved to ensure that they feel comfortable with continuing with the research.
- 16.4. Children and at-risk adults should have a same sex chaperone for one-to-one research where appropriate.

Members of the University who work with children or at-risk adults should be provided

with appropriate training by the University on issues to be aware of when working with children and at-risk adults and how they should deal with any disclosure made to them.

**17. Procedure to be followed where staff or students have concerns about their own actions or conduct**

17.1. If any of the following occur, you should report this immediately to the Safeguarding Officer for a specific activity, or the University Safeguarding Coordinator.

Academic Coordinators, Course Leaders, or their equivalents, can assist students in reporting concerns to the University Safeguarding Coordinator:

- if you accidentally hurt a child or at-risk adult;
- if they seem distressed in any manner;
- if an at risk person appears to be sexually aroused by your actions;
- if you are concerned that a relationship is developing that could represent an abuse of trust;
- if you are concerned that an at risk person is becoming attracted to you;
- if you are concerned that a colleague is becoming attracted to someone in their care;
- if someone in your care misunderstands or misinterprets something you have done in a manner that might give rise to safeguarding concerns;
- if you have had to use reasonable physical restraint to prevent a child/at-risk adult harming themselves, or another, or from causing significant damage to property;

**18. Procedure to follow if abuse is disclosed by a member of the University who is over the age of 18**

If current or historical abuse by someone un-associated with the University is disclosed by a current or previous member of the University who is over the age of 18, they should be referred to the University Safeguarding Coordinator. Alternatively, support is available from confidential helplines and organisations outlined within this document or via the University's Counselling Service for current members of the University (available through Student Advice).

**19. Safeguarding guidance for running events or activities**

19.1. All University activities involving children or at-risk adults must include in their management plans the names of at least one person who is the designated Safeguarding Officer for the activity. For short non-residential visits to the campus, relevant staff will be notified of the Safeguarding Officer for the activity. Residential activities will normally have two designated Safeguarding Officers

- 19.2. Where appropriate, the name and contact details of Activity Safeguarding Officer must be communicated to the children and at-risk adults involved in the activity, their parents or carers, students and staff members.
- 19.3. The organisers of an activity that involves children or at-risk adults will be expected to arrange appropriate training for all staff. The following must be covered:
- risk assessment;
  - handling a potential safeguarding disclosure;
  - reporting a safeguarding allegation;
  - confidentiality;
  - Code of Conduct.
- 19.4. Maintaining unmonitored contact with children or at-risk adults after the authorised University related contact is not permitted.

## **20. Prevent Duty**

- 20.1. The University is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015.
- 20.2. The University acknowledges that anyone could be vulnerable to being drawn into terrorism, not only children or those defined as at risk under the Care Act 2014. The University's procedures in relation to prevent are outlined in its Prevent Statutory Duty Policy.

### Reporting a Concern related to the Prevent Duty

- 20.3. If a Member of the University is concerned that another member of the University may be at risk of being drawn into terrorism, or they believe an incident took place at the University where terrorism may have been promoted, they must report this to the Head of Student Support (see annex 8) using the Annex 5 form, which should be delivered to Student Advice in a sealed envelope marked Urgent and Highly Confidential. The Head of Student Advice will confirm receipt of this. In the absence of the Head of Student Advice, the notification form should be given to the University Safeguarding Coordinator, in their absence the deputies listed in 9.2 should be contacted.
- 20.4. The Head of Student Advice will consider the submitted form and where necessary share it with the Prevent FE/HE Regional Coordinator, or external agencies, as required.

## **21. Monitoring and review**

- 21.1. The Head of People and Organisational Development, Registrar / and any nominated staff member(s) will record any incidents related to safeguarding and report them in an anonymised form to the VCEG on an annual basis. Confidentiality will be maintained at all times. Any concerns or patterns that emerge will be dealt with appropriately.
- 21.2. This Code of Practice will be reviewed in accordance with the University's guidance on

document administration (considered on an annual basis, with a full review every three years) to ensure that the policy still fits within the organisation of the institution. The University Safeguarding Coordinator will also monitor the Code of Practice in response to any legal or other developments in this area as and when they arise.

## **ANNEX 1 – Types of abuse**

1. The main forms of abuse are described below.

### Physical Abuse

This involves deliberate physical harm. It includes hitting, shaking, throwing, squeezing, burning and biting, as well as giving children and at-risk adults inappropriate drugs or poisonous substances. It also includes attempted suffocation or drowning and fabricating the symptoms of an illness. Reasonable physical restraint to prevent a child or at-risk adult from harming themselves, another person, or from causing serious damage to property is not deemed to be abuse.

### Sexual Abuse

This involves forcing or enticing a child or at-risk adult to take part in sexual activities, whether or not they are aware of what is happening. It involves the use of children or at-risk adults by adults – both male and female – to meet their own sexual needs. This could include direct sexual activity, penetrative or non-penetrative acts, masturbation, taking indecent photographs or videos, voyeurism, or showing children and at-risk adults pornographic material or encouraging them to behave in sexually inappropriate ways.

### Neglect and Acts of Omission

This involves the failure to meet the child or at-risk adult's physical and/or psychological needs and is likely to result in the serious impairment of their health or development. It may involve a failure to provide food, warmth, clothing, appropriate affection, attention and recognition, or a failure to protect a child or at-risk adult from physical harm or danger, or a failure to ensure access to appropriate medical care or treatment.

### Self-Neglect

Self-neglect has been recognised in the Care Act 2014 as a category of abuse and neglect and should be supported through safeguarding. The term 'self-neglect' refers to an inability/unwillingness to care for an individual's own self or environment. Examples of self-neglect include poor hygiene and unacceptable living conditions. Although self-neglect may be raised as a safeguarding concern, it is usually dealt with as an intervention via other procedures.

### Discriminatory Abuse

This involves abuse motivated by discriminatory attitudes towards a child or at-risk adult on the basis of their race, culture, religion or belief, language, sex, age, disability or sexual orientation and any other protected characteristics as defined by the Equality Act 2010.

### Emotional/Psychological Abuse

This involves the emotional ill treatment of a child or at-risk adult such as to cause a severe and adverse effect on their emotional development. As well as persistent lack of love and attention, this includes constant criticism, threats, taunting and words and action that demean the child or at-risk adult. Within the context of an educational organisation, it may include persistent denigration of their work or ability. It may involve conveying to the individual that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve causing them to feel frightened or in danger, or the exploitation or corruption of children and at-risk adults. There is usually some level of emotional abuse in all types of abuse, but it can also occur alone.

#### Financial or Material Abuse

Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an individual’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial ‘transactions, or the misuse or misappropriation of property, possessions or benefits.

#### Modern Slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

#### Organisational or institutional abuse

Includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

## **2. Recognition of abuse**

Abuse can, and does occur, both within a children or at-risk adults’ families and in institutional or community settings. The University acknowledges that some individuals seek to use voluntary and community organisations to gain access to children and at-risk adults, and that it is necessary to have an open mind when the possibility arises that a member of the University is suspected of abuse or inappropriate activity.

2.1. The following may indicate that a child or at-risk adult is being or has been abused:

- unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- an injury for which the explanation appears inconsistent;
- the child or at-risk adult describes an abusive act or situation;

- unexplained changes in behaviour;
- inappropriate sexual awareness or sexually explicit behaviour;
- the child/at-risk adult appears distrustful of others;
- the child/at-risk adult is not allowed to be involved in normal social activities;
- the child/at-risk adult becomes increasingly unkempt.

2.2. The recognition of abuse is not always easy and the University acknowledges that many of its members are not experienced in this area and will not easily know whether or not abuse is taking place. However, it is their responsibility to act on concerns in order to safeguard the welfare of children/at-risk adults.

## ANNEX 2

### Safeguarding of Children and at-risk adults - Incident Reporting Form

**1. Please indicate what you are reporting:**

- I have concerns that abuse may be occurring (complete sections 2 and 3).
- I was involved with an incident with a child/at-risk adult (complete sections 2 and 4).
- I was a witness to an incident with a child/at-risk adult (complete sections 2 and 4).
- I have received an allegation of abuse (complete sections 2 and 5).
- A child/at-risk adult has told me that they are/were being abused (complete sections 2 and 5).

**2. Important information:**

Your name:

Your contact details:

Name of child/at-risk adult concerned:

Capacity in which young person is known to you:

Description of any signs of abuse:

**Do not remove clothing to inspect physical signs of abuse.**

**3. Concerns abuse may be occurring:**

Please use the space below to record the concerns that you have that an individual may be subjecting children or at-risk adults to abuse; this may include a child/at-risk adult being unusually distressed, a child being sexually aroused or appearing to be attracted to an adult, an adult appearing to be inappropriately attracted to an at risk person, a relationship that an adult is having with someone in their care, a change in a child/at-risk adult's attitude or behaviour. Continue on a separate sheet if necessary.

**4. Incident with a child or at-risk adult**

Please tick which of the following has occurred:

- I accidentally hurt a child/at-risk adult.
- A child/at-risk adult misinterpreted or misunderstood something I have done.
- I have had to use reasonable physical restraint.
- I was a witness to one of the above (please indicate which one).

Please provide further information, including any action you may have taken so far and the reasons for doing so. Continue on a separate sheet if necessary.

**5. Allegation/Disclosure of abuse:**

Allegation received from

Allegation received on:

Name of person about whom allegation has been made:

Please use the space below to record the details of the allegation or disclosure you received. This should be a factual account of the information you have received only. Do not include assumptions or opinions of others. Make sure you record details of dates and times and any other potentially useful information. If the disclosure has come from the child/at-risk adult who is claiming they are being abused, the conversation should be recorded in their words. Continue on a separate sheet if necessary.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete this form, sign it and submit it to the University Safeguarding Coordinator immediately.**

## **ANNEX 3 – Practice Guidance on Safeguarding for Members of the University**

### **How to minimise risk**

All members of the University should be encouraged to demonstrate exemplary behaviour when working with children and at-risk adults in order to protect them from abuse and themselves from false allegations. The following are common sense examples of how to create a positive culture and climate.

#### **1. Good practice**

- 1.1. Maintain a register of children /at-risk adults working with you at any given time.
- 1.2. Work in an open environment avoiding private or unobserved situations and encouraging open communication. Avoid spending excessive amounts of time alone with children and at-risk adults away from others.
- 1.3. Treat all children and at-risk adults equally, with respect and dignity.
- 1.4. Always put the welfare of the child/at-risk adult first.
- 1.5. Maintain a safe and appropriate distance with children and at-risk adults. It is not appropriate for staff, students or volunteers to have an intimate relationship with children or at-risk adults.
- 1.6. Ensure that if any form of manual/physical touching is required, it should be provided openly. (In sporting situations, this should be according to guidelines provided by the appropriate National Governing Body.)
- 1.7. Involve parents/carers/teachers wherever possible, e.g. by encouraging them to take responsibility for the people in their care in areas where there is an increased risk safeguarding allegations arising (e.g. changing rooms).
- 1.8. Avoid taking photographs of children without appropriate consent.
- 1.9. Be an excellent role model – this includes not smoking or drinking alcohol in the company of children.
- 1.10. Where required, give enthusiastic and constructive feedback rather than negative criticism.
- 1.11. Follow the University's incident reporting procedures where injuries or near-misses occur.
- 1.12. Attend relevant training courses that the University provides.
- 1.13. Always consider safeguarding specifically in any risk assessment for activities involving children or at-risk adults.

#### **2. The following should never be sanctioned. You should never:**

- 2.1. engage in rough physical or sexually provocative games;
- 2.2. share a room overnight with a child;

- 2.3. go into a child's room unless absolutely necessary. (If it is necessary, two members of staff should enter);
  - 2.4. allow or engage in any form of inappropriate touching;
  - 2.5. allow children to use inappropriate language unchallenged;
  - 2.6. make sexually suggestive comments to a child or at-risk adult;
  - 2.7. deliberately reduce a child/at-risk adult to tears as a form of control;
  - 2.8. allow allegations made by a child/at-risk adult to go unchallenged, unrecorded or not acted upon;
  - 2.9. invite or allow children/at-risk adults to stay with you at your home unsupervised;
  - 2.10. do things of a personal nature for children/at-risk adults that they can do for themselves. (It may sometimes be necessary for staff or volunteers to do things of a personal nature for children and at-risk adults, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents/carer or teacher. There is a need to be responsive to the individual's reactions, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting them to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained);
  - 2.11. sports and some research activities involving children/at-risk adults may necessitate physical contact. It is important for you to understand what is appropriate within such activities, to avoid anything that could be misunderstood, and for such activities to be supervised. (Appropriate training will be provided.)
3. Guidance on your response if a child or at-risk adult discloses a potential safeguarding concern.
- 3.1. If a child or at-risk adult says something or acts in such a way that abuse is suspected the person receiving the information should:
    - 3.1.1. react in a calm but concerned way;
    - 3.1.2. tell the child/at-risk adult that he/she is right to share what has happened; and that he/she is not responsible for what has happened;
    - 3.1.3. take what the child/at-risk adult says seriously;
    - 3.1.4. keep questions to a minimum only to clarify what the child/at-risk adult is saying;
    - 3.1.5. not ask leading questions, especially those that would only allow a 'yes/no' answer;
    - 3.1.6. not interrupt the child/at-risk adult when they are recalling significant events;
    - 3.1.7. not give assurances of confidentiality which cannot be kept but should reassure the child/at-risk adult that the information will only be passed on to those people who need to know;

- 3.1.8. make a record of what is said and done, though this should not result in a delay in reporting the problem. The form in Annex 2 be used to record this information.

It is recognised that staff may need support after receiving a disclosure from an at risk person and will be offered appropriate counselling. This can be accessed by contacting HR.

#### 4. Further information

For more information on safeguarding matters, please see

- Working Together to Safeguard Children <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Keeping Children Safe in Education <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Lincolnshire Safeguarding Children Board/LSCB website ( [www.lincolnshire.gov.uk/lscb](http://www.lincolnshire.gov.uk/lscb))

## ANNEX 4

### Agreement for External Organisations using Bishop Grosseteste University's facilities

#### 1. Explanation

It is University's policy that any external organisation using Bishop Grosseteste University's facilities for activities with children and at-risk adults must confirm that they have a Child Protection or Safeguarding Policy and that they have conducted the appropriate checks on their staff. Below is a form of wording to be used when entering into an agreement with such an organisation. It is imperative that this document is signed by the external organisation in order to make it clear that they are responsible for any safeguarding issues that occur while they are on campus.

This document must be signed prior to using any University facility.

#### 2. Agreement

2.1. It is the responsibility of all groups and voluntary organisations accompanying children and at-risk adults using the University's facilities to comply with legislation governing the protection of such persons. It is the policy of Bishop Grosseteste University to seek assurances of such compliance and accordingly it requires confirmation of the following:

2.1.1. that the organisation has a Child Protection or Safeguarding Policy;

2.1.2. that appropriate DBS checks have been conducted in relation to all staff and/or volunteers accompanying children and at-risk adults while on University premises; and no person whose checks indicate that he/she is unsuitable to work with children or at-risk adults will be included in any activities taking place on the University's premises.

2.1.3. The University cannot be held responsible for the death or personal injury of anyone attending events, unless such death or personal injury occurs as a result of the University's negligence or breach of statutory duty. The University is not responsible for any other loss or damage that may occur while attending the University's premises unless it occurs as a result of the University's negligence or its wilful damage. Groups/voluntary organisations are responsible for the security of all property/valuable possessions brought onto the University premises and are advised to arrange separate insurance for such property/valuable possessions.

I/we confirm that I/we have complied with (a) and (b) and agree to (c) above and have given a copy of the University's exclusion of liability clause to all persons attending the University for whom I/we have responsibility (or to their parent/carer, where appropriate).

I confirm that I have authority to sign on behalf of that group/organisation (where this form is signed by an individual on behalf of a group/organisation).

Are you registered with a regulatory body (esp. involving safeguarding matters)? YES / NO  
If so, which?

Signed: \_\_\_\_\_

On behalf of: \_\_\_\_\_

Dated: \_\_\_\_\_

Please attach a copy of your Child Protection Policy or Safeguarding Policy. RECEIVED?  
YES / NO

Please confirm that you have read Bishop Grosseteste University's Code of Practice for  
Safeguarding

Children and At-risk adults, available from the University or from  
<http://www.bishopg.ac.uk/about/Governance/Pages/policies-procedures.aspx>.

CONFIRMED? YES / NO

## ANNEX 5 Report of Concern – Prevent agenda

### 1. Please indicate what you are reporting:

- I have concerns that a child, at-risk adult, or other member of the University has been, or is at risk of being 'drawn into terrorism'. (Fill out section 3 and 4)
- I am concerned that an event or incident took place at the University where an individual, or individuals may have acted with the intention to promote terrorism. (Fill out section 5)

### 2. Important information:

- a. Your name:
- b. Your contact details:

### 3. Concern that concerns that a child, at-risk adult, or other member of the University has been, or is at risk of being 'drawn into terrorism'.

- a. Name of person(s) that you are concerned about:
- b. Capacity in which this/these person(s) is/are known to you:
- c. **Please give a description of the things which have given you concern that the person(s) named in 3c. have been or is/are at risk of being drawn into terrorism.**

Continue on a separate sheet where necessary

**4. Details of an incident which may have had the intention of promoting terrorism**

- a. Date and time of the event or incident:
  
- b. Location of the event or incident:
  
- c. Name(s) of the event organiser(s) (if applicable)
  
- d. Name(s) of the person(s), and their organisation (if applicable) of who may have acted with the intention of promoting terrorism.
  
- e. What happened that gave you reason to believe that the person(s) named in 5d. may have intended to promote terrorism?

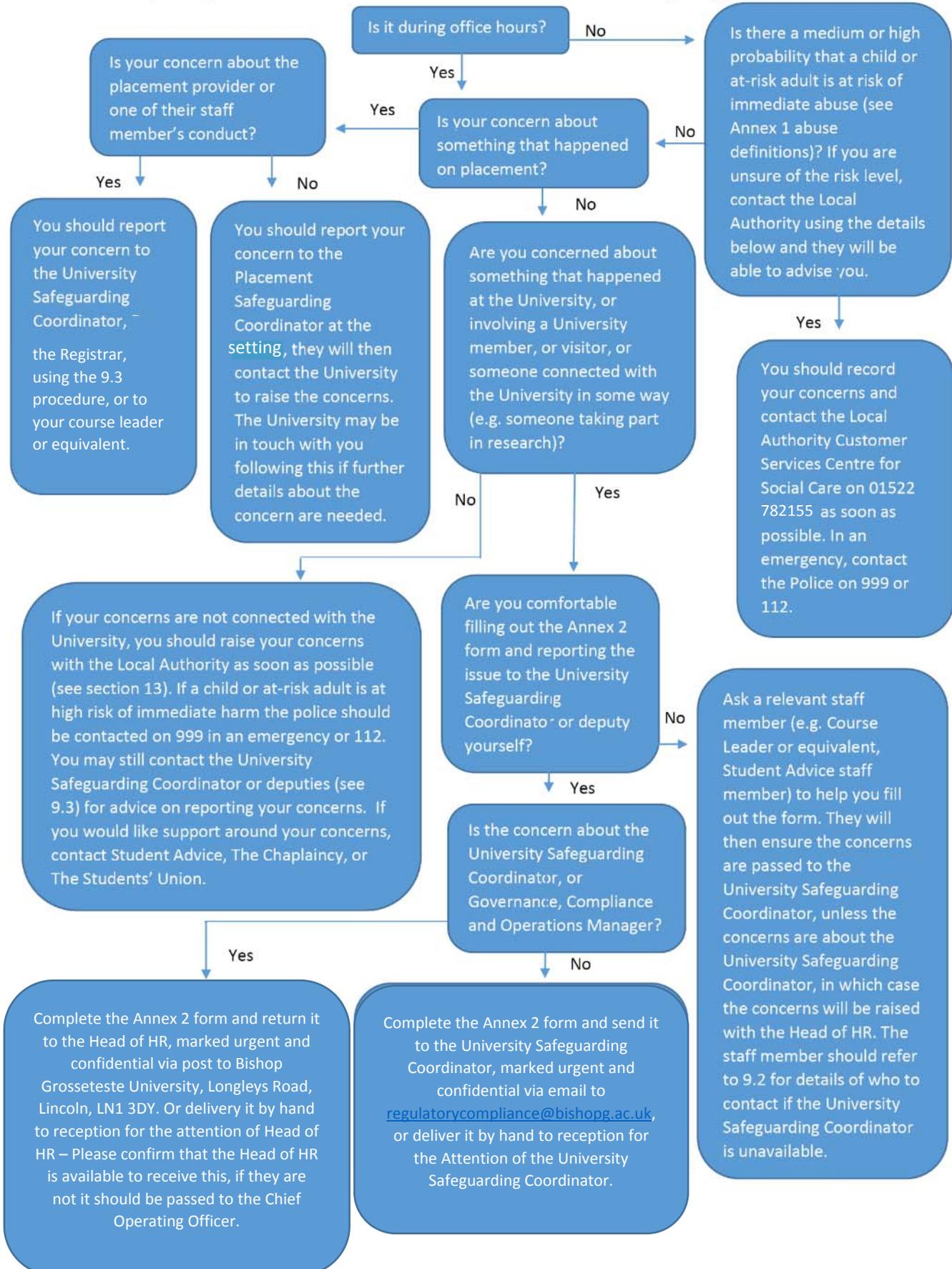
Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please complete this form, sign it and submit it to the Head of Student Advice immediately, marked Urgent and Confidential.**

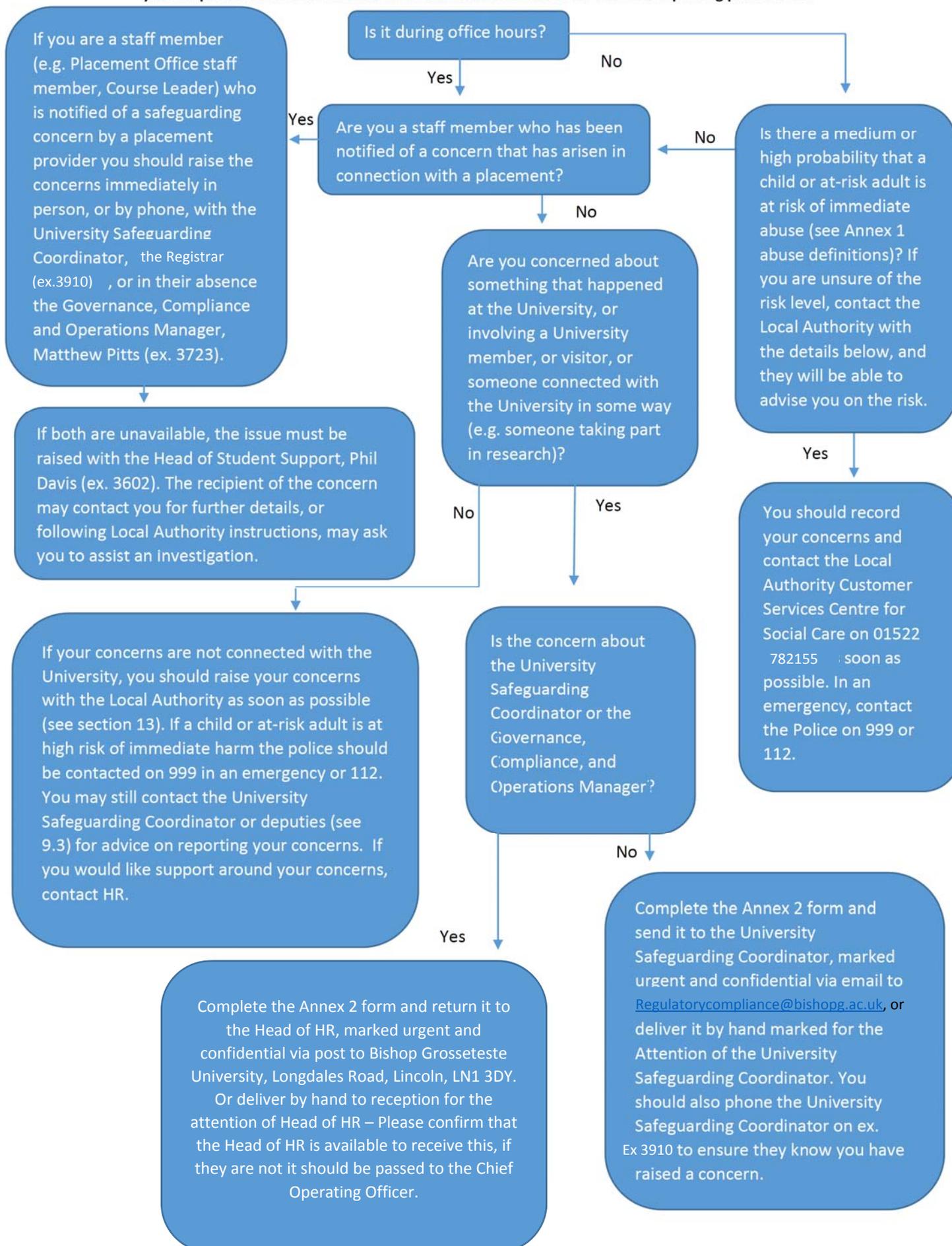
**Annex 6 – Student Concern about a potential Safeguarding issue.**

**UNDER NO CIRCUMSTANCES SHOULD UNIVERSITY MEMBERS RAISE CONCERNS WITH A POTENTIAL PERPETRATOR OF ABUSE, AS THIS MAY COMPROMISE ANY STATUTORY INVESTIGATION, UNLESS EXPLICIT CONSENT TO DO SO IF GIVEN BY THE LOCAL AUTHORITY. If an alleged victim informs you of potential abuse, where practicable, refer to Annex 3, Section 3 for guidance on your response. Refer to Sections 9-19 of this Code of Practice for detailed reporting procedures.**



## Annex 7 – Staff/Contractor Concern about a potential Safeguarding issue.

**UNDER NO CIRCUMSTANCES SHOULD UNIVERSITY MEMBERS RAISE CONCERNS WITH A POTENTIAL PERPETRATOR OF ABUSE, AS THIS MAY COMPROMISE ANY STATUTORY INVESTIGATION, UNLESS EXPLICIT CONSENT TO DO SO IF GIVEN BY THE LOCAL AUTHORITY. If an alleged victim informs you of potential abuse, where practicable, refer to Annex 3, Section 3 for guidance on your response. Refer to Sections 9-19 of this Code of Practice for detailed reporting procedures.**



## Annex 8 - Contact details

### Designated University Safeguarding Coordinator (Registrar and Secretary)

Role	Position	Name	Contact
<b>Internal Contacts</b>			
Designated University Safeguarding Coordinator (Lead Officer)	Registrar	Ms Stephanie Gilluly	External - 01522 583910 Internal - 3910 stephanie.gilluly@bishopg.ac.uk
Deputy to Lead Officer (see section 9)	Head of Quality and Regulatory Compliance	Ms Kelly Fisher	External – 01522 563660 Internal – 3660 kelly.fisher@bishopg.ac.uk
Deputy to Lead Officer (see section 9)	Governance, Compliance and Operations Manager	Mr Matthew Pitts	External – 01522 583723 Internal – 3723 matthew.pitts@bishopg.ac.uk
Deputy to Lead Officer (see section 9)	Director of People and Organisational Development	Mr Umar Zamman	External – 01522 583690 Internal - 3690 Umar.zamman@bishopg.ac.uk
Deputy to Lead Officer (see section 9)	Head of Student Advice	Mr Phil Davis	External – 01522 583602 Internal – 3602 phil.davis@bishopg.ac.uk
<b>External Contacts</b>			
Local Authority Designated Officer (LADO) (normal working hours)	LADO	NA	01522 554674
Customer Services Centre for Social Care ( <b>to report urgent issues outside of working hours</b> )	Local Authority	NA	01522 782155
Child Services Customer Service Centre (normal office hours)	Local Authority	NA	01522 782111
Customer Service Centre (at risk adults) (normal office hours)	Local Authority	NA	01522 782155
NSPCC 24-hour helpline on	NSPCC – Children’s Charity	NA	0808 800 5000
Police Advice	Police	NA	101

Police Central Referral Unit (daytime)	Police	NA	01522 947590
Police (emergencies)	Police	NA	999 or 112