



# Safeguarding Policy

<b>Date</b>	<b>Purpose of Issue/Description of Change</b>	<b>Equality Impact Assessment Completed</b>
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<b>Policy Officer</b>	<b>Senior Responsible Officer</b>	<b>Approved By</b>	<b>Date</b>
Head of Governance and Compliance	University Secretary	Compliance Task Group	1 <sup>st</sup> October, 2018

*This Policy will be reviewed in 3 years*

## 1. INTRODUCTION

Universities are not specifically covered by any particular safeguarding legislation, however Bangor University recognises that it has a responsibility and certain legal powers to safeguard those with whom it comes into contact, or who come on to its premises.

The safeguarding requirements of the Counter Terrorism and Security Act 2015 are also covered by the University's *Prevent Policy*.

### [a] Definitions

In this Policy the following words shall mean:

**"Child", "Children"** means anyone who has not yet reached their 18th birthday.

**"Contract workers"** means persons employed by the University on a temporary basis

**"Safeguarding Officer"** means the University's Head of Governance and Compliance

**"Staff"** means all persons employed by the University

**"Students"** means any persons currently registered for the receipt of instruction by the University

**"University premises"** means all buildings and grounds owned or operated by the University

**"Visitors"** means any persons on University grounds for any reason whether invited by staff, student or otherwise

**"Volunteer"** means persons lawfully carrying out unpaid work for the University

**"Vulnerable adult"** means a person who is 18 years of age or over, and who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself, or unable to protect himself against significant harm or serious exploitation.<sup>1</sup> and may be a person who<sup>2</sup>:

- has learning disabilities;
- has mental health problems including dementia;
- is an older person with support/care needs;
- is physically frail or has chronic illness;
- has a physical or sensory disability;
- misuses drugs or alcohol;
- has an autistic spectrum disorder.

**"Young people"** means children aged 16 or 17 years of age

### [b] Statement of Principles

Bangor University is committed to:

- Providing as far as reasonably practicable, a safe environment for all its staff, students and visitors.
- Providing, as far as is reasonably practicable, an environment that is safe from harm for all members of the University community.

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<sup>1</sup> As defined in the Welsh Government guidance, *In Safe Hands 2000*

<sup>2</sup> All Wales Safeguarding Supervision Policy 2017

- Upholding the rights of children, young people and vulnerable adults to protection from harm, freedom from injury and a safe and healthy environment.
- Ensuring that appropriate procedures are in place to safeguard against abuse or harm for children, young people and vulnerable adults.
- Ensuring that appropriate procedures are in place for dealing with allegations of abuse.

The University recognises that the success of the Policy will depend on its effective implementation. The University is committed to ensuring this Policy is disseminated within the University and will provide training for key staff and others as appropriate.

The Policy and its associated procedures are managed by the Head of Governance and Compliance to whom any questions about the Policy or its operations should be referred.

### **[c] Scope of the Safeguarding Policy**

This Policy applies to University activities and facilities involving children, young people and vulnerable adults and covers:

- All staff employed by the University;
- All students registered at the University;
- Volunteers and contract workers engaged on behalf of the University;
- All circumstances where children, young people and vulnerable adults attend University premises and /or participate in University activities.

In discharging its obligations in relation to vulnerable adults (who, it is recognised, are over 18 years old) the University will, in addition, adhere to the following core values:

- **Privacy** – the right of individuals to be left alone or undisturbed and free from intrusion or public attention into their own affairs.
- **Dignity** – recognition of the intrinsic value of people, regardless of circumstances, by respecting their uniqueness and their personal needs; treating people with respect.
- **Independence and self-determination** – the opportunity to act and think without reference to another person, including a willingness to incur a reasonable and informed degree of personal risk.
- **Choice** – the opportunity to select independently from a range of options.
- **Rights** – the maintenance of all entitlements associated with citizenship.
- **Fulfilment** – the realisation of personal aspirations and abilities in all aspects of daily life.

### **[d] Relevant Legislation, Policies and Procedures**

In relation to working with children, young people and vulnerable adults, staff should adhere to all legal requirements and procedures as well as have regard to any guidelines produced by the appropriate professional bodies.

The University recognises that it has certain legal powers and duties to safeguard the welfare of children, young people and vulnerable adults on its premises or who come into contact with its staff, students, volunteers or contractors under the Children Acts of 1989 and 2004 and the Health and Safety at Work etc. Act 1974.

Where University staff hold a position of trust with a child or young person, an improper relationship in these circumstances is likely to constitute an abuse of trust offence under the Sexual Offences Act 2003.

The University has powers under the Rehabilitation of Offenders Act 1974 to enquire as to the criminal record history of staff, students or volunteers to assess any risk to children and to take steps to safeguard children and young people in accordance with the Protection of Freedoms Act 2012.

A list of relevant legislation, policies and procedures is included as Appendix 1 to the Policy.

## **2. AREAS OF ACTIVITY INVOLVING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS**

The following are identified as areas where the University may have contact with children, young people and vulnerable adults (this is not an exhaustive list):

- Teaching, supervision and support of students;
- Individuals employed by the University;
- Individuals undertaking work experience at the University;
- Students in University residences and individuals who attend residential events;
- Children and young people in University-owned or managed family accommodation
- Children and young people attending the University to carry out a sporting or recreational activity;
- On-site nursery (which has its own safeguarding policies in place);
- Visits to the University's sports facilities;
- Individuals who are research subjects;
- Attendance at private functions run commercially by the University;
- Conferences;
- On placements and in other professional and clinical settings;
- Field trips, excursions & other activities such as volunteering and other social activities;
- The activities of student societies and networks;
- Individuals who are on University premises on non-University organised events, for open days, or other University-organised events;
- Individuals attending University-organised events at venues away from University premises.

### 3. RESPONSIBILITIES

#### [a] Compliance Task Group

The **Compliance Task Group** is responsible for the development, implementation, monitoring and review of the University's Safeguarding Policy.

#### [b] Corporate Services

The **University Secretary** is the Senior Responsible Officer for safeguarding within the University and chairs the Compliance Task Group.

The **Head of Governance and Compliance** is the designated Safeguarding Officer within the University, and is responsible for:

- Implementing and promoting this Policy.
- Ensuring the Policy is monitored and reviewed in accordance with any changes in legislation and / or guidance on the protection of children.
- Acting as the main contact within the University for the protection of children, young people and vulnerable adults.
- Ensuring that appropriate members of staff are provided with information, advice and training on the protection of children.
- Establishing and maintaining contact with local statutory agencies including the police and social services.
- Responding appropriately to disclosures or concerns which relate to the well-being of a child, young person or vulnerable adult.
- Maintaining confidential records of reported child protection cases and action taken.
- Where necessary, and following the University's Safeguarding Referral Procedures, making referrals to the Independent Safeguarding Authority, such as the Police or Local Authority.

#### [c] Deans of College, Heads of School and Directors of Professional Services

**Deans of College, Heads of School and Directors of Professional Services** are the designated Safeguarding Co-ordinators for their respective College, School or Service. In discharging their duties they can assign a member of staff to act on their behalf. The designated Safeguarding Coordinator is responsible for the following:

- i) Ensuring that any programme or activity involving children, young people and / or vulnerable adults is risk assessed (a template for risk assessing activities and programmes is included in Appendix 4), and that it is planned, organised and delivered, (including explicitly noting any child protection issues), in a manner that is consistent with this Policy;
- ii) Ensuring that arrangements are in place to identify children, young people or vulnerable adults who fall within their sphere of responsibility and making sure adequate arrangements are in place to ensure the appropriate members of staff are notified;

- iii) Ensuring that all staff posts involving substantial unsupervised access to children and young people are identified and that the relevant statutory verification procedures (such as Disclosure and Barring Service (DBS) checks) are undertaken;
- iv) Ensuring that degree programmes and modules that they host are assessed to identify any substantial, unsupervised involvement with children and young people and where such involvement is identified that the programme and module specification requirement explicitly state the need for verification procedures (such as DBS checks);
- v) Ensuring that staff, students and volunteers involved in any programme or activity involving children / young people and / or vulnerable adults are adequately trained, and where necessary that DBS checks are undertaken;
- vi) Informing the University Safeguarding Officer of specific child protection measures for the programme or activity, including, where appropriate, the name of any appointed person for those child protection measures.
- vii) Ensuring that in drawing up partnership and franchise agreements the requirements of the Safeguarding Policy are included and reflected in all relevant documentation.
- viii) Ensuring that suitable procedures are in place within their sphere of responsibility which authorises, or otherwise, members of staff and students to bring children or young people onto University property.

**[d] Involvement of parents, carers, guardians and legal representatives**

The University is committed to ensuring that parents, carers, guardians and legal representatives are fully aware of the activities and risks that children, young people and (where possible) vulnerable adults may encounter in University activities.

In circumstances other than where the young person is a student or employee of the University, parent/guardian/carer consent will be obtained (either directly from the parents, guardian or carer of the individual or through a school or other organising body) before the University undertakes an activity involving children or young people, or (where it is appropriate) vulnerable adults, whether on or away from University premises.

Where a student is under 18 at the point of admission to the University the requirements of the *Policy and Procedures for Bangor University Students under 18* will apply.

**4. VERIFICATION PROCEDURES**

The University has a legal requirement to ensure that all appropriate verification procedures are undertaken for staff, students and volunteers who work with children, young people and vulnerable adults on a sustained or regular basis. Verification procedures must be

undertaken by the relevant Dean of College, Head of School or Director of Professional Service, or their designated officer.<sup>3</sup>

Where a post, role or activity involves substantial, unsupervised access to children, young people or vulnerable adults on a sustained or regular basis<sup>4</sup> the University may in its discretion, to the extent the law permits, require staff or students to disclose any criminal records they may have by undertaking a Disclosure and Barring Service (DBS) check at the appropriate level prior to any contact.

Deans of College, Heads of School and Directors of Professional Services should also familiarise themselves with the requirements of the University's *Research Ethics Policy*<sup>5</sup> which may require that appropriate verification procedures be undertaken for certain individuals carrying out research with children, young people and vulnerable adults.

The University, through the Human Resources Department, will undertake appropriate DBS Standard or Enhanced Disclosures in respect of posts or roles, which involve regularly caring for, training, supervising or being in sole charge of children, young people or vulnerable adults.

The University is committed to treating special category<sup>6</sup> personal information carefully and confidentially. DBS Disclosures will be sought on a strictly need to know basis, and be assessed by the relevant senior officer or Officer who will act impartially and fairly.

The Safeguarding Vulnerable Groups Act 2006 and Protection from Freedoms Act 2012 provide for the creation of a referral, vetting and barring scheme through the Disclosure and Barring Service (DBS). The University has a legal duty to refer people to the DBS (upon completion of University internal disciplinary processes) when they have harmed a child or vulnerable adult, or if there was a risk of harm. Anyone barred by the ISA cannot work or volunteer with the vulnerable group or groups from which they are barred

## **5. RESPONSIBILITY RELATING TO ALLEGATIONS OF HARM**

It is the University's policy that:-

- [a] If any member of staff, any student or volunteer has knowledge concerns or suspicions that a child, young person or vulnerable adult is suffering, has suffered or is likely to be at risk of harm, then they must refer the matter to the University's Safeguarding Officer who will liaise with the relevant statutory agencies.
- [b] In addition, if any member of staff, student or volunteer has specific concerns relating to a child, young person or vulnerable adult's safety or welfare on any programme, activity or during their use of University facilities they should raise the matter with their Dean of College, Head of School or Director of Professional Service as the designated

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<sup>3</sup> Further advice on all verification procedures can be obtained from Human Resources.

<sup>4</sup> This would include staff such as counsellors; student wardens; senior wardens; head of residences; security staff; student services; voluntary youth workers and personal tutors of students under 18.

<sup>5</sup> Further guidance can be found on the Governance and Compliance Office web site.

<sup>6</sup> Information about an individual's race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

Safeguarding Representative who will refer the matter to the University's Safeguarding Officer.

- [c] Any referrals made to the Safeguarding Officer will be considered prior to being referred on to the relevant statutory agencies as soon as possible.
- [d] Disclosures within the Counselling Service will be dealt with under the relevant professional Code of Conduct for Counsellors and Psychotherapists. Information will be passed to the Safeguarding Officer when deemed appropriate by the Counselling Service.

Under section 3 of the Sexual Offences (Amendment) Act 2000 it is an offence for any person aged 18 or over to engage in any sexual activity with a person under that age where they are in a position of trust in relation to the younger party. A position of trust includes looking after young people who are in full time education.

## **6. CHILDREN / YOUNG PEOPLE OF STAFF AND STUDENTS**

Students and Staff with children are responsible for ensuring that they comply and follow local rules provided by their College, School or Service, or the College, School or Service that they are visiting.

Staff and students who bring children or young people onto University property are primarily responsible for the supervision and safety of those children or young people.

Students should also consult the University's *Student Pregnancy and Maternity Policy* with regard to bringing children on to campus.

## **7. TRAINING AND GUIDANCE**

It is essential that training be provided for key staff, students and volunteers on relevant issues connected with this policy.

The University will provide training and briefing sessions for relevant staff, students and volunteers from time to time. The training will be overseen and arranged by the Governance and Compliance Office.

Updated guidance and support will be provided by the University from time to time from the Governance and Compliance Office.

## **APPENDIX 1**

Relevant legislation in relation to this Policy includes but is not limited to:

*The Children Act 1989*  
*The Data Protection Act 2018*  
*The Protection of Children Act 1999*  
*The UN Convention on the Rights of the Child*  
*The Sexual Offences (Amendment) Act 2000*  
*The Children Act 2004*  
*The Safeguarding Vulnerable Groups Act 2006*  
*The Protection of Freedoms Act 2012*  
*The Social Services and Well-being (Wales) Act 2014*  
*Children and Social Work Act 2017*  
*Female Genital Mutilation Act 2003*  
*The Wellbeing of Future Generations (Wales) Act 2015*  
*The Public Interest Disclosure Act 1998*

In addition the following legislation and procedures should be taken into account:

*The Care Standards Act 2000*  
*The All Wales Child Protection Procedures*  
*Qualifying to Teach – Professional Standards for Qualified Teacher Status and Requirements for Initial Teacher Training*  
*Independent Safeguarding Authority (ISA) Guidance on Vetting and Barring*  
*ISA Referral Guidance*  
*The Management of Health and Safety at Work Regulations 1999*  
*Provision and Use of Work Equipment Regulations 1998*  
*Rights of Children and Young Persons (Wales) Measures 2011*

Relevant University Policies include but are not limited to:

*Policy and Procedures for Students under 18*  
*Admissions Policy*  
*Halls Allocation Policy*  
*Policy on Personal Relationships for Staff and Students*  
*Health and Safety Policy*  
*Data Protection Policy*  
*Prevent Policy*

## APPENDIX 2

### Procedures and Guidance

Staff are expected to actively contribute to an organisational culture where inappropriate behaviour is not tolerated.

These procedures give University staff advice on action which should be taken relating to the protection of children, young people and vulnerable adults. It is important that staff demonstrate exemplary behaviour, and should bear in mind that someone else might misinterpret their actions, no matter how well intentioned. Due consideration must always be given to what is an appropriate environment and what is appropriate conduct in relation to children, young people and vulnerable adults.

### INDICATIONS OF ABUSE

University staff who are in regular and frequent contact with children, young people and vulnerable adults are well placed to observe outward signs of abuse, however all University staff should be aware of the signs and symptoms and should report any outward signs of abuse and/or unexplained changes in behaviour.

Possible indicators include:-

#### [a] **Neglect**

- Physical neglect: Inadequate clothing, Poor growth, Hunger / deficient nutrition
- Emotional neglect, Excessive dependence, Attention seeking

#### [b] **Sexual Abuse**

- Physical signs, precocity and/or withdrawal.

#### [c] **Financial or Material Abuse**

Resulting from acts of commission and omission on the part of others including theft, fraud, and pressure around wills, property or inheritance, misuse or misappropriation of benefits.

- unexplained or sudden inability to pay bills;
- unexplained or sudden withdrawal of money from accounts;
- disparity between assets and satisfactory living conditions;
- reluctance by vulnerable adult / relatives to accept any necessary assistance requiring expenditure when finances are not a problem (NB some people are naturally thrifty);
- extraordinary interest by family members and other people in the vulnerable adult's assets;
- missing personal belongings such as art or jewellery.

These indicators are not in themselves proof of abuse but merely give rise to suspicion. If members of staff see signs which cause them concern they should seek guidance from their line manager and/or the University Safeguarding Officer.

## **REPORTING SIGNS OF ABUSE**

If any member of staff has knowledge concerns or suspicions that a child, young person or vulnerable adult is suffering, has suffered or is likely to be at risk of harm, then they must ensure that the concerns are referred to the University's Safeguarding Officer as soon as possible.

It is not up to individual members of staff to decide whether or not an allegation is true. A member of staff should never try to deal with a suspicion, allegation or actual incident of abuse by themselves.

Concerns must be reported as soon as possible and where an individual is at immediate risk of harm or abuse, the Safeguarding Officer must be notified verbally straight away. If the concerns relate to the Safeguarding Officer they should be referred to the University Secretary.

## **ADVICE FOR STAFF**

All individuals should be treated equally, with respect and dignity. Staff should ensure that children, young people and vulnerable adults are protected from discrimination on any grounds, including ability, and should challenge discriminating comments and behaviour.

### **If an individual tells you that they or another individual is being abused:-**

- Show that you have heard what they are saying and are taking it seriously
- Encourage them to talk, but don't prompt or ask leading questions. Try not to interrupt when they are talking.
- Explain what actions you must take in a way which is appropriate to the age of the individual.
- Do not promise to keep what you have been told confidential – you have a responsibility to disclose information to those who need to know.
- Write down what you are being told – using exact words if possible
- Make a note of the date, time and place and any other people present at the discussion
- Report your concerns as soon as possible to your line manager or the Safeguarding Officer.
- Do not confront the alleged abuser
- Don't worry about not being believed – it is far better to discuss any concerns

### **If you are concerned about the behaviour of any adult (including a member of University staff) towards children / young people or vulnerable adults**

- Do not ignore your concerns

- Do not confront the individual
- Discuss your concerns with your line manager or the Safeguarding Officer

### **Private meetings with children/young people/vulnerable adults**

- Staff should always work in an open environment and should never be left alone with a child, young person or a vulnerable adult.
- Where a confidential interview or a one-to-one meeting is necessary, it should be conducted in a room with an open door or visual access. Where this is not possible there should always be another adult nearby.

### **Caring for children/young people**

- If staff have to administer first aid to under 18s they should ensure, wherever possible, that other students and/or staff are present if there is any doubt that physical contact could be misconstrued.
- Staff should never make gratuitous physical contact with a child or young person. Where a distressed child or young person needs physical comforting staff should ensure that it is appropriate and not unnecessary.
- If a staff member feels that his/her actions have been, or may be, misconstrued he/she should discuss the matter with their Dean of College, Head of School or Director of Professional Service at the earliest opportunity. A written record of the incident should be kept.

### **General Advice for Staff**

- Staff should always ensure that their relationships and manner, particularly with children, young people or vulnerable adult, are appropriate, taking care that their conduct does not give rise to comment or speculation.
- Staff should always maintain a safe and appropriate distance with children, young people and vulnerable adults.
- If children or young people of mixed genders are to be supervised, they should always be accompanied by a male and female member of staff.
- At residential events, staff should not enter children/young people's rooms unaccompanied, nor invite them to their own rooms. If it is necessary for a member of staff to enter a child/young person's room, then he or she must always be accompanied by another adult.
- Staff should never use physical force against another individual unless it constitutes reasonable restraint to protect him/her or another person or to protect property. Incidents should always be recorded in writing immediately afterwards, along with a witness statement where possible.

Advice adapted from the Department of Education and Science guidelines *“Working Together for the Protection of Children from Abuse: Procedures within the Education Service”*

**APPENDIX 3**

**STRICTLY CONFIDENTIAL**



**Bangor University Safeguarding Referral Form**

*For completion by individual reporting concerns in as much detail as possible  
Return to the Head of Governance and Compliance, Governance and Compliance Office*

**[A] Name and address of the person reporting the information:**

**[B] Relationship of the referrer to the child / young person / vulnerable adult (if any):**

**[C] Information on whether the parent or carer is aware of the referral being made:**

**[D] Name, date of birth and address of any alleged or suspected abuser and whether he/she is aware of the referral**

**Name:**

**Date of Birth:**

**Address:**

**State if he/she is aware of the referral:**

Yes / No

**[E] Nature of referral:**

**[F] Name, date of birth and address of the child (ren) / young person (s) / vulnerable adult(s) involved in the referral:**

**1. Name: Date of Birth:**

**Address:**

**2. Name: Date of Birth:**

**Address:**

**[G] The name, age and address of any other person who has direct knowledge of the referral:**

**Name: Date of Birth:**

**Address:**

**[H] Details of any relevant dates, times and places in relation to the referral:**

**Date: Time:**

**Place:**

**[I] Name, age and address of the child's parent/main carers and/or the names of those with Parental Responsibility:**

**Name: Date of Birth:**

**Address:**

**Name: Date of Birth:**

**Address:**

[J] Name, date of birth and address of any other person known to have information on the referral:

Name: Date of Birth:

Address:

SIGNED: .....

NAME: .....

DATE: .....

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*On behalf of the University:- Safeguarding Officer*

Date Form Received: .....

Action Taken:

Signed: .....

Date: .....

Name of School / Department:

Date of Risk Assessment:

1. What are the hazards?	2. Who might be harmed?	3a) Evaluate the hazard	3b) What are you already doing?	3c) What further action is necessary?	4. How will you put the assessment into action?
<i>List the hazards.</i>	<i>List who might be harmed.</i>	<i>High: could occur quite easily</i>  <i>Medium: could occur sometimes</i>  <i>Low: unlikely, although conceivable</i>	<i>List what is already in place to reduce the likelihood of harm or to make any harm less serious</i>	<i>You need to make sure that you have reduced risks to compare what you are already doing with good practice. If there is a difference, list what needs to be done.</i>	<i>Remember to prioritise. Deal with hazards that are high-risk and have serious consequences first.</i>  <i>Action Done</i> <i>by whom by when</i>
<i>Hazard Example - Failure of staff to follow guidelines on reporting concerns.</i>	<i>Children may be harmed due to mishandling or non-reporting of child protection concerns.</i>	<i>H</i>	<i>Staff asked to read/become aware of child protection policy and procedures.</i>	<i>Education through training on child protection awareness workshop.</i>	<i>Safeguarding Officer</i>
Hazard A					
Hazard B					
<b>Completed by:</b>			<b>Signed:</b>		