

**Children and Vulnerable Adults
Safeguarding Policy**

Owner	Head of HR
Date	October 2018
Version	v1.0

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1. Statement of Policy

- 1.1 This document states the Institute's policy on preventing and reducing harm to children and vulnerable adults when they are in contact with Institute staff, visitors, researchers, volunteers or students.
- 1.2 The policy aims to:
 - 1.2.1 Promote and prioritise the safety and wellbeing of children and vulnerable adults
 - 1.2.2 Provide assurance to parents, carers and other parties that the Institute takes reasonable steps to manage risks and keep children and vulnerable adults safe
 - 1.2.3 Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters
 - 1.2.4 Prevent the employment of individuals in work with children and/or vulnerable adults where they have been barred by the DBS or are deemed by the Institute to pose an unacceptable risk to vulnerable groups
 - 1.2.5 Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or vulnerable adults arising from contact with Institute staff, visitors, researchers, volunteers or students, whether the harm has taken place on Institute premises or not.
- 1.3 The Children and Vulnerable Adults Safeguarding Policy also seeks to manage effectively the risks associated with activities and events involving children and vulnerable adults:
 - 1.3.1 Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these
 - 1.3.2 Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis
 - 1.3.3 Ensuring that the appropriate DBS checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children or vulnerable adults
 - 1.3.4 Requiring all new employees and individuals involved in working with children or vulnerable adults to familiarise themselves with the content of this policy.
- 1.4 This policy requires that any suspicions and allegations involving harm to children and vulnerable adults are referred to Human Resources to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.
- 1.5 The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect staff, visitors, researchers, volunteers and students from false or unfounded accusations.
- 1.6 The Children and Vulnerable Adult Safeguarding Policy should be used as the basis of each department's approach to preventing and reducing harm to children and vulnerable adults.

2. Application and definitions

Application

- 2.1 The key parts of the Children and Vulnerable Adults Safeguarding Policy apply as described below. Please note that the policy is intended to work alongside the equivalent policies of the Institute's university partners, where appropriate.

Risk assessment process

- 2.2 Recruitment to a new or existing post which involves working directly with children and/or vulnerable adults
- 2.3 The commencement of new activities or events involving or potentially involving children and or vulnerable adults; and
- 2.4 Changes being made to activities or events involving or potentially involving children and or vulnerable adults.

Screening check processes

- 2.5 These apply to those carrying out work for the Institute which involves direct contact with children and/or vulnerable adults and meets the eligibility criteria for a DBS check

Procedure for dealing with reported suspicions and allegations

- 2.6 This applies to all Institute members of staff, visitors, researchers, volunteers and students made aware of, or involved in, an allegation or suspicion involving harm to children and/or vulnerable adults.

Appendix B Code of Practice

- 2.7 This applies to all Institute members of staff, visitors, researchers, volunteers and students who come into direct contact with children and vulnerable adults.

Definitions

- 2.8 A child or young person is anyone under the age of 18.
- 2.9 Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations.
- 2.10 An adult may be vulnerable if he/she:
- 2.10.1 Has a learning or physical disability; or
 - 2.10.2 Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
 - 2.10.3 Has a reduction in physical or mental capacity; or
 - 2.10.4 Is in the receipt of any form of healthcare; or
 - 2.10.5 Is detained in custody; or
 - 2.10.6 Is receiving community services because of age, health or disability; or
 - 2.10.7 Is living in sheltered or residential care home; or
 - 2.10.8 Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

- 2.11 It is recognised that people who meet one or more of the criteria above may not be vulnerable at all, or all of the time. However, until a department has direct contact with people on an individual basis, it may be impossible to identify whether vulnerability exists in relation to an activity or event involving adults that they are planning.
- 2.12 Therefore, in order to support the Institute in identifying and managing potential risks of harm to people effectively, and for the purposes of this policy only, a vulnerable adult should be identified (for the purposes of this policy only) as a person aged 18 or over who meets one or more of the criteria listed above.

Examples of Institute activities involving children and vulnerable adults

- 2.13 Institute staff, visitors, researchers, volunteers or students may encounter children and vulnerable adults in a wide range of situations.

These include, but are not limited to, the following:

- 2.13.1 Research work, which involves direct physical contact with children and/or vulnerable adults;
- 2.13.2 Work experience students under 18;
- 2.13.3 Widening participation outreach activities with schools and colleges (in the Institute and external);
- 2.13.4 Science Festivals;
- 2.13.5 Open days;
- 2.13.6 Working with disabled students.

3. Procedure

Raising awareness of the policy

- 3.1 The Institute must ensure that all new members of staff and researchers are made aware of this policy and that they are given time to read it during their induction period. Training is available upon request from HR on conducting risk assessments in relation to working with children and vulnerable adults.

Initiating the Risk Assessment Process

- 3.2 Organisations are required under health and safety legislation to protect people as far as is 'reasonably practicable'. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks
- 3.3 The Children and Vulnerable Adults Risk Assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department/institution):
- 3.3.1 Recruitment to a new or existing post which involves working with children and/or vulnerable adults;
 - 3.3.2 The commencement of new activities or events involving or potentially involving children and or vulnerable adults;
 - 3.3.3 Changes being made to activities or events involving or potentially involving children and or vulnerable adults.
- 3.4 Please note that where there are multiple posts, activities or events of a similar nature, it is unnecessary to complete an individual risk assessment for each of them. Instead, it is

possible to complete an overarching assessment for a particular type of post, activity or event and ensure that it manages the relevant risks appropriately.

- 3.5 Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within his/her planning process and ensures that it is completed.

Completing the Risk Assessment Process

- 3.6 A risk assessment must be completed in advance of the relevant recruitment campaign, activity or event by a competent person (where there are not current, adequate and documented risk management procedures already in place). Risk assessments must be completed by a competent person; that is someone who understands the job, activity or event and is aware of the hazards. It is important to note that the Institute's insurance may be invalid if a claim is made and no risk assessment is in place.
- 3.7 The purpose of the risk assessment is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children or vulnerable adults. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or vulnerable adult and considering whether the activity could be supervised or observed by others.
- 3.8 Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

The risk assessment should:

- 3.8.1 Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised;
 - 3.8.2 Consider if there will be children and adults who are particularly at risk;
 - 3.8.3 Consider whether any children or vulnerable adults have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties;
 - 3.8.4 Identify any potential areas for harm;
 - 3.8.5 Evaluate the risks;
 - 3.8.6 Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented;
 - 3.8.7 Identify those situations that would require a DBS check
- 3.9 Completed risk assessments should be retained by the Institute whilst an activity/event is ongoing and for the period of time specified in the Institute's retention of documents register after it has ceased (or the risk assessment has been superseded). Where an activity is ongoing but unchanged, the Institute should review the risk assessment on a regular basis to ensure that the measures put in place are still relevant and appropriate.
 - 3.10 It is important for the Institute to remember to complete a risk assessment prior to any work experience placement being provided. HR provides advice and support for departments on the arrangement of work experience, including for children, to ensure that appropriate arrangements are in place and that there is compliance with relevant legislation.

Identifying required checks

- 3.11 Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with children and/or vulnerable adults.

- 3.12 In addition, the Institute must consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed).

DBS checks

- 3.13 The Institute obtains DBS checks through a registered third-party Umbrella Organisation
- 3.14 There are three types of checks, Basic checks and Standard and Enhanced checks
- 3.15 Roles in the Institute which involve working directly with children and vulnerable adults fall into the category of 'regulated activity' and so are eligible in law for an enhanced DBS check with appropriate barred list check.

Basic Disclosures

- 3.16 As set out in the Screening Policy, the Institute requests basic disclosures for all roles and standard or enhanced where applicable to the role
- 3.17 At the start of the recruitment process or planning for an activity/event, and as part of the risk assessment process described above the department will need to assess for such roles (with support from HR):
- 3.17.1 The nature of the contact with children/vulnerable adults;
 - 3.17.2 The level of risk arising from the duties/responsibilities of the role;
 - 3.17.3 Whether a basic disclosure would be relevant to managing that risk;
 - 3.17.4 If there are more effective alternative means of managing the risk.
- 3.18 An appropriate individual in the department/institution will need to determine whether the check must be completed before an individual can start work or if there are activities that the individual could reasonably and safely carry out before the check result has been received. Guidance on whether a check can be treated as 'essential before start' or not can be obtained from HR.
- 3.19 Appropriate control measures must be set out in the risk assessment and implemented in order to minimise any risk arising from the checks not having been completed when the individual begins work. Examples of control measures include not allowing the individual to commence any work relating to the checks until it has been completed or ensuring that he/she is supervised at all times.

Disclosure of a criminal record

- 3.20 Where a criminal conviction is disclosed by an applicant or through a DBS check the Head of HR (or nominated deputy) will work with the department head (where appropriate) to assess the level of risk.
- 3.21 The Head of HR will consider this assessment objectively and, where the assessment indicates that the level of risk is too high to allow the individual to start/continue working in a particular role/activity, the consequences of this for the individual will be dependent upon:
- 3.21.1 The check concerned;
 - 3.21.2 The reason for the check (that is, check for a new employee, a recheck for an existing employee in their current post or a check for an existing employee in a new post);
 - 3.21.3 Relevant legislation;
 - 3.21.4 The post concerned;
 - 3.21.5 Whether the individual is suitable for other employment opportunities available within the Institute.

- 3.22 Where appropriate, the head of the department will be involved in the decision process. Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

Recruitment of ex-offenders

- 3.23 The Institute welcomes applications from a wide range of candidates, including those with criminal records. Having a criminal record will not necessarily bar an individual from working at the Institute. This will depend on the nature of the position and the circumstances and background of the offence.
- 3.24 The Institute complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a disclosure because of a conviction or other information revealed.

Dealing with reported suspicions and allegations

- 3.25 Concerns for the safety and wellbeing of children and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse.
- 3.26 According to the Department for Education and Skills, there are four main types of abuse, which are outlined in Appendix A. It is not always easy to recognise a situation where abuse may occur or has taken place and Institute employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or vulnerable adult. It is important that the recipient of any complaint or accusation that a child or vulnerable adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.
- 3.27 To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.
- 3.28 It is impossible to promise complete confidentiality when a concern is raised or an accusation made. This is because the Institute owes a duty of care to its staff, researcher, students or visitors that cannot be fulfilled unless the Institute takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to the Institute, should be informed.
- 3.29 Where an individual suspects or is informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking part in an Institute activity/event or through contact with Institute staff, visitors, researchers, volunteers or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must contact the Head of HR immediately for guidance and assistance on the action that must be taken. The Head of HR will work with our university partners as appropriate. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111).
- 3.30 Where a complaint of abuse is reported, the Head of HR will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant head of department and take

further action through the relevant internal procedures. This may include invoking the Institute's employee disciplinary procedures, and/or working with our university partners.

- 3.31 In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), Institute staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with HR. Where this is necessary, HR should be informed immediately afterwards. In such cases, a criminal investigation may follow.
- 3.32 The Institute has a legal obligation to refer to the DBS where we remove an individual (including volunteers or other participants) from the workplace or would or might have removed him/her (if the individual has already left prior to the conclusion of the disciplinary procedure), someone who has caused harm or would have or poses a risk of harm to a vulnerable person.
- 3.33 Noncompliance with this duty is regarded as a criminal offence and may be committed by a corporate body as a regulated activity provider, an officer of the body, or a person acting on behalf of a regulated activity provider.
- 3.34 All cases for possible referral must be raised with the Head of HR in the first instance as soon as harm or a risk of harm is identified. The Head of HR and the Head of department should work together to complete the DBS referral form found on the DBS's web pages.

Data protection

- 3.35 The Institute complies with the principles of GDPR in the way it collects, holds and disposes of personal information.

4. Roles and Responsibilities

- 4.1 The Head of HR is the Institute's designated safeguarding person. As such, he/she takes overall ownership of the policy and will promote the importance of safeguarding within the Institute. Due to the size of the Institute, the day-to-day operation of the policy and its procedures will be the responsibility of other individuals, as outlined below.
- 4.2 Each head of department is accountable for the adoption and implementation of this policy. They are required to promote the importance of safeguarding within their department and ensure that appropriate systems in place for:
 - 4.2.1 All their staff to become familiar with the Children and Vulnerable Adult Safeguarding Policy during their induction;
 - 4.2.2 Relevant staff to review the department/institution's activities and follow the Children and Vulnerable Adult Safeguarding risk assessment process.
- 4.3 It is the responsibility of the member of staff leading the recruitment campaign, activity or event which involves working with Children and Vulnerable adults to:
 - 4.3.1 Identify that the Children and Vulnerable Adults Safeguarding procedure is applicable to a particular role, activity or event;
 - 4.3.2 Ensure that staff, workers, volunteers and students working with children and vulnerable adults are familiar with the contents of the policy and its application before any new or changed activity/event;
 - 4.3.3 Complete/update the risk assessment;
 - 4.3.4 Ensure implementation and review of the actions identified by the risk assessment;
 - 4.3.5 Identify whether individuals recruited or involved in an activity or event require a DBS check or basic disclosure and, where applicable, ensure that this is carried out in accordance with HR/Student Registry procedures.

- 4.4 Staff, visitors, researchers, volunteers and students working with children and vulnerable adults within the Institute should be familiar with this policy. In addition, they should conduct themselves in accordance with the Code of Practice set out in Appendix B. This provides guidance on acceptable and desirable conduct to protect both children and vulnerable adults who come onto Institute premises to study and to visit, and those working with them.
- 4.5 Every individual who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the Head of HR.
- 4.6 The Head of HR will be the initial point of contact where any allegations of abuse against children and vulnerable adults are raised. In determining whether a referral needs to be made to the DBS, they will hold responsibility for:
 - 4.6.1 Promoting the Children and Vulnerable Adult Safeguarding Policy in the Institute
 - 4.6.2 Dealing with any reported suspicions and allegations of abuse of children or vulnerable adults within the Institute.
 - 4.6.3 Providing appropriate information when making referrals to external agencies (such as Social Services or the Police) in all cases of suspected abuse of children or vulnerable adults.
 - 4.6.4 Ensuring that appropriate records are kept in relation to the reporting of suspected abuse.

5. Context

- 5.1 The Institute has a duty, both in law and as a responsible organisation, to take reasonable care of children and vulnerable adults coming onto its premises. The Institute aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and vulnerable adults. The Institute encounters children and vulnerable adults in a variety of settings, including through its teaching and research activities, as well as through its outreach programmes.
- 5.2 Safeguarding in relation to children is defined by the Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as requiring:

“Agencies [and organisations] working with children and young people to take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and Where there are concerns about children and young people’s welfare, all agencies [and organisations] take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies’.
- 5.3 The Institute is fully committed to meeting the requirements of safeguarding, as defined above, both in relation to children and vulnerable adults, in order to ensure that they are safeguarded whilst enjoying opportunities to develop their full potential.

6. Policy Ownership and Status

- 6.1 The Children and Vulnerable Adults Safeguarding Policy is owned by the HR. It will be periodically reviewed and updated by HR, in consultation with the Academic team, to ensure compliance with relevant legislation and internal change.
- 6.2 HR will ensure that each published version of this policy is archived, along with details of when it was in operation.

Appendix A – Types of Abuse

The categories of abuse below are produced from external guidelines. A person may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm. There are four main forms of abuse, although there are variations within these:

1. Physical Abuse

Deliberate physical harm to children and vulnerable adults or any other form of harm which causes illness in a child or vulnerable person.

2. Sexual Abuse

Forcing or manipulating a child or vulnerable adult to take part in sexual activities.

3. Neglect

This involves the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological need, likely to result in the serious impairment of the child or vulnerable adult's health or development.

4. Emotional Abuse

This involves the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's emotional wellbeing and/or development. 2 The Department for Education and Skills guidance: "What to do if you're worried a child is being abused" (2006)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/190604/DFES04320-2006-ChildAbuse.pdf 20

Appendix B – Code of Practice

When working with children and/or vulnerable adults, Institute staff, students, researchers and volunteers are expected to take account of the guidance below in the way that they conduct themselves.

1. Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
2. Wherever possible, work in an open environment with children where they can be seen by others.
3. Avoid unnecessary physical contact.
4. Avoid taking a child or vulnerable adult alone in a car on journeys, however short.
5. Avoid taking a child or vulnerable adult to the toilet, unless another adult is present, or another adult is aware (this may include a parent, group leader or other responsible person).
6. In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you.
7. Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
8. Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
9. Avoid showing favouritism towards particular participants.
10. Report incidents of alleged abuse to the relevant HR Business Manager/Adviser and ensure that any allegations are recorded.
11. Report any concerns about poor practice to senior management or HR.
12. Report any accidents to the designated person in the department/institution for recording and investigation where required.
13. Avoid personal relationships with a child or vulnerable adult.
14. It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”.
15. Staff, students and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
16. Only official Institute social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with children or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).
17. Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted.
18. Participate in training available to you to support you in your work with children and vulnerable adults.
19. First aid treatment should be given with more than one adult present unless a delay would be life-threatening.

20. Do not take children or vulnerable adults to your home.
21. Maintain confidentiality about sensitive information.
22. Where it is necessary for staff, students or volunteers to take photographs or video images of children or vulnerable adults, written consent must be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the Data Protection Act. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs.