

# Safeguarding Vulnerable Individuals; Our Policy, Protocols and Code of Conduct

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## Safeguarding Policy

### 1. Scope of this policy:

The University recognises that it has a duty to safeguard individuals who are on University premises or engaging in University activities. This includes members of staff, students, and volunteers, outside contractors, visitors and members of the public. This list is not exhaustive.

As part of its commitment to equal opportunities, diversity, the Prevent Duty and the provision of a safe working environment, the University has in place the necessary procedures designed to protect individuals. These procedures are contained in the attached Protocols. These procedures apply in relation to all members of the University staff (full time, part time, casual or relief), the student body and visitors.

### 2. General principles – the University:

- Is committed to providing a safe environment for all its employees, students and people who use its facilities and services.
- Recognises that vulnerable individuals may require additional protection in accordance with its statutory duties and common law duty of care.
- Recognises its responsibility to raise awareness of staff and students of this policy and the relevant procedures.
- Will ensure that appropriate procedures are in place to enable it to discharge its duties and to ensure that cases of suspected abuse, neglect of vulnerable individuals or concerns re potential radicalisation are dealt with sensitively and effectively in accordance with the law and relevant guidance.
- Will ensure that investigations into reports of suspected abuse, neglect or potential radicalisation are carried out in a fair and timely manner.
- Will work in conjunction with other agencies (for example, social services, the Police and health services) and any other bodies to safeguard vulnerable individuals in the implementation and monitoring of this Policy.
- Will ensure that all allegations of abuse, neglect of vulnerable individuals or potential radicalisation are reported.
- Undertakes to review this Policy at no less than three yearly intervals.

### 3. Safeguarding responsibilities

The **Lead Signatory** of the Registered Body that is Aberystwyth University (hereafter referred to as 'the Lead Signatory') has overall strategic responsibility for this Policy and for its review. The Lead Signatory is Professor Tim Woods, Pro Vice-Chancellor Learning, Teaching and Student Experience.

There are two **Designated Verification Officers (DVOs)** one each for Staff & Students. They are responsible for the day to day implementation of this policy. The DVOs will be accountable to the Lead Signatory for the effective implementation of this policy and specifically for alerting the Lead Signatory of any significant concerns relating to the policy. The DVO Students is Emma Williams, Academic Registrar and the DVO Staff is Nick Rogers, Director of Human Resources and Organisational Development.

The **Designated Reporting Officer (DRO)** is Caryl Davies, Director of Student Support Services.

A Programme Verification Officer may be appointed for a specific programme, event or activity, or (typically in the case of the Arts Centre, Sports Centre, Residential Services and SELL) an individual may be nominated as PVO for all programmes or activities in that particular sector. The PVO will be

accountable to the appropriate DVO (Students or Staff) for their area of responsibility. The PVO will ensure Disclosure and Barring Services (DBS) checks in their area are carried out as per Protocol 2 for students and liaise with Human Resources for staff DBS checks.

**All members of staff or any student** who suspect a safeguarding issue must report their concerns to the DRO, or if very serious / urgent they should contact the police directly (and subsequently report to the DRO directly).

Upon receiving a report the DRO must report the concerns to the officer in the relevant Authority(s) in England and / or Wales, and where appropriate to the Police. In addition, immediate measures must be put in place by the DRO to ensure that the child or vulnerable individual is safe and that any necessary evidence is protected.

If appropriate, the DRO should immediately inform the Lead Signatory that it may be necessary to suspend a member of staff or a student, or to exclude an individual from University premises under University procedures pending determination of the issue. **Full regard must be had to the rights of any alleged perpetrator.**

#### **4. Staff and student recruitment**

The Lead Signatory has strategic responsibility for ensuring that the vetting and recruitment of staff and student vetting and admissions procedures are implemented, and for monitoring its operation.

The DVO-Staff has operational responsibility for ensuring that all employees of the University (full time, part time, casual and relief) have, when necessary, undergone the appropriate checks under this Policy. The DVO-Staff will ensure that all transitional legal requirements relating to employment are complied with. Employees include students under a contract of employment with the University insofar as the involvement with a child or vulnerable individual arises under that contract and not from their status as a student.

The DVO-Staff will provide advice and assistance to Heads of Department within the University to enable them to identify when a particular post falls within the scope of this policy.

Heads of Department will notify the DVO-Staff if such a post currently exists or is going to exist within their area of responsibility. Protocol 1 outlines the procedure to be applied in the recruitment to such posts and to existing posts falling within this policy.

A post may not normally fall within this Policy, but a specific activity may do so (e.g. a research project, outreach activity or recruitment activity). In such circumstances, the head of department or section must notify the DVO-Staff.

The DVO-Students has operational responsibility for ensuring that all registered students involved with a child or vulnerable individual by virtue of their status as a student have when necessary undergone the appropriate checks under this Policy.

For the purpose of this Policy a Volunteer will also be considered to be an employee or student of the University and if there is appropriate involvement with vulnerable groups will fall under the remit of the respective DVO.

Protocol 1 describes the processes for Staff Recruitment and Protocol 2 describes the processes for Student Recruitment.

## **5. Research involving children and vulnerable individuals or security sensitive materials**

Where a research project involves vulnerable individuals or security-sensitive material, ethical approval must be obtained from the University's Research Ethics Committee.

If such a proposal is given ethical clearance by the Committee then this Policy will apply and the necessary checks under this policy undertaken.

Where the research project involves a current or future employee, it is the responsibility of the relevant Head of Department or section to notify the DVO-Staff that a new post is being created, or an existing post modified.

Where the research project involves an undergraduate or postgraduate student, it is the responsibility of the head of department or section to notify the DVO-Students.

## **6. Externally organised events involving vulnerable individuals taking place on University premises**

It is the responsibility of the organisation running the conference/event to care for individuals attending the conference/event and have the appropriate safeguarding measures in place, e.g. appropriate staff-to-children ratios, and to be DBS checked if required.

The appropriate department of the University will be responsible for asking the external conference/event organiser visiting the University to provide a copy of their Safeguarding Policy and DBS policy prior to the booking being taken. If the organisation is unable to provide such a policy the PVO can provide basic guidance on this matter to the conference organiser, as the conference/event cannot go ahead without a Safeguarding Policy.

## **7. Disclosure and Barring Services (DBS) checks**

The Disclosure and Barring Service carries out criminal record checks for specific positions and professions and a DBS certificate is required for staff working in these specific positions and professions as part of the University's pre-recruitment check following an offer of employment, including volunteering roles. Specific students on specific undergraduate and postgraduate courses may be required to have a DBS check if working with vulnerable individuals is part of the course process as defined by the legal definitions of regulated activity.

**For the purposes of Disclosure and Barring Services (DBS) checks the following definitions apply:**

'Child' is defined as anyone under the age of 18 years. For the purpose of this policy the term 'young individual' has the same meaning. (Please note:-The new definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.). In this policy wherever vulnerable individuals are referred to this includes children.

There are six categories of people who will fall within the new definition of regulated activity (and so will anyone who provides day to day management or supervision of those people). A broad outline of these categories is set out below.

<p><b>1) Providing health care</b></p>
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<p>Any health care professional providing health care to an adult, or anyone who provides health care to an adult under the direction or supervision of a health care professional. (Please see the</p>
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Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, for further details about what is meant by health care and health care professionals).

2) **Providing individual care:**

Anyone who:

- provides physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of an adult's age, illness or disability;
- prompts and then supervises an adult who, because of their age, illness or disability, cannot make the decision to eat or drink, go to the toilet, wash or bathe, get dressed or care for their mouth, skin, hair or nails without that prompting or supervision;
- trains, instructs or offers advice or guidance which relates to eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails to adults who need it because of their age, illness or disability.

3) **Providing social work** --The provision by a social care worker of social work which is required in connection with any health care or social services to an adult who is a client or potential client.

4) **Assistance with cash, bills and/or shopping** --The provision of assistance to an adult because of their age, illness or disability, if that includes managing the individual's cash, paying their bills or shopping on their behalf.

5) **Assistance in the conduct of an individual's own affairs** - Anyone who provides various forms of assistance in the conduct of an adult's own affairs, for example by virtue of an enduring power of attorney. Please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, for the further categories which are covered here.

6) **Conveying**-- An individual who transports an adult because of their age, illness or disability either to or from their place of residence and a place where they have received, or will be receiving, health care, individual care or social care; or between places where they have received or will be receiving health care, individual care or social care. This does not include family and friends or taxi drivers.

It is recognised best practice to update every two years the DBS status of individuals in post in Aberystwyth University who have already been DBS checked, and every three years for students. Heads of Department are responsible for ensuring staff members have their DBS status updated, and PVOs within Academic Faculties/Departments are responsible for ensuring student DBS statuses are updated.

## 8. **Storage and Handling of Documents (Students and Staff)**

Disclosure information will not be kept on an employee's file or student record and will always be kept separately and securely, in lockable, non-portable storage container with access strictly controlled and limited to those who are entitled to see the information as part of their duties.

### Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those entitled to see it in the course of their duties. This includes the Lead Signatory and the Human Resources Department or Admissions Team as appropriate.

### Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### Retention

Once a recruitment decision had been made, disclosure information is not kept for longer than is absolutely necessary. This is generally for a period up to six months to allow for the consideration and resolution of any disputes or complaints. If, in exceptional circumstances it is considered necessary to keep the disclosure information for longer than six months the University will consult the DBS and give full consideration to the Data Protection legislation and the individual's human rights before so doing. Throughout this time the above conditions regarding safe storage and controlled access will prevail.

### Disposal

Once the retention period has elapsed, the University will ensure that any disclosure information is destroyed by secure means. Whilst awaiting destruction disclosure information will not be kept in any insecure receptacle. The disclosure information will not be photocopied nor will any other image of the documentation be retained. Notwithstanding the above, we may keep a record of the contents of the disclosure, the name of the subject, the unique reference number and the details of the recruitment decision taken.

## **9. Acronyms**

AQRO - Academic Quality and Records Office

COO – Chief Operating Officer

DBS – Disclosure and Barring Services

DRO – Designated Reporting Officer

DVO – Designated Verification Officer

HoD – Head of Department

HR – Human Resources

PVC – Pro Vice-Chancellor

PVO – Programme Verification Officer

### **A list of relevant contact details:**

Lead Signatory

Professor Tim Woods - Pro Vice-Chancellor – Learning, Teaching and Student Experience

E-mail: [tww@aber.ac.uk](mailto:tww@aber.ac.uk)

Phone: 01970 622009

Designated Reporting Officer

Caryl Davies – Director of Student Support Services

E-mail: [ccd@aber.ac.uk](mailto:ccd@aber.ac.uk)

Phone: 01970 621853

Designated Safeguarding Officer

Students: Emma Williams –Academic Registrar

E-mail: [elw40@aber.ac.uk](mailto:elw40@aber.ac.uk)

Phone: 01970 622013

Staff: Nick Rogers – Director of Human Resources and Organisational Development

E-mail: [nir24@aber.ac.uk](mailto:nir24@aber.ac.uk)

Phone: 01970 622053

## Procedure and Protocols for Disclosure and Barring Services (DBS) checks

The designated Lead Signatory for the University as a registered body is the Pro Vice- Chancellor – Learning Teaching and Student Experience

The counter signatories (DVOs) are the Director of Human Resources and Organisational Development and the Academic Registrar. These post-holders are registered with the DBS to countersign applications and receive the Disclosures.

It is the responsibility of each Head of Department in the University to identify all new and any existing posts or student activities that will have a DBS check as a requirement.

Heads of Department will have guidance provided by HR colleagues to help in the identification of all staff posts, including Postgraduates who undertake regulated and controlled activity as part of their role or in a voluntary capacity through Aberystwyth University. This designation should be included as part of the staffing request process. Written guidance is available at <http://www.aber.ac.uk/en/media/departmental/humanresources/employmentinformation/criminalrecordsbureau/disclosure-and-barring-service-check.pdf>

It is the responsibility of Heads of Department to identify all courses involving compulsory elements which involve contact with children and/or vulnerable individuals, which meet the requirements for a DBS check. This should be carried out as a part of the normal admissions process. The relevant Schools and other outside agencies should then be provided with confirmation of appropriate DBS checks.

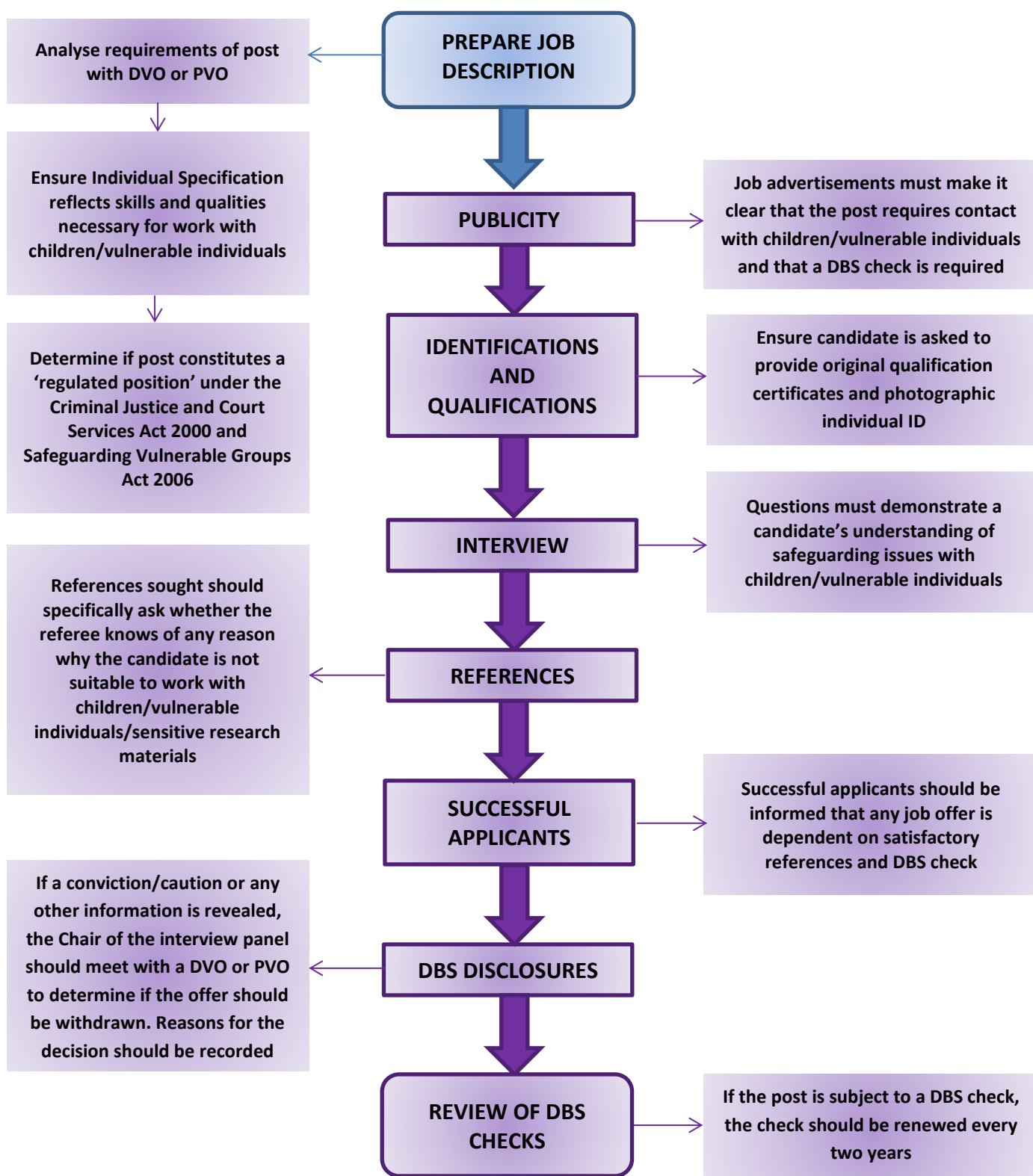
Payment for such checks and registrations in the case of staff will be made by the respective department. Students will be required to fund DBS checks themselves. Where roles involve contact with vulnerable individuals, references sought should specifically ask whether the referee knows of any reason why the individual is not appropriate to work with vulnerable individuals.

The DVO Staff is responsible for undertaking the DBS check process on staff and the DVO Students in Admissions, or the PVO in an Academic Department/Faculty is responsible for undertaking the DBS checks on students. This is done by ensuring that applicants are aware that it is a requirement for the post/role/place (this post having already been identified and designated as requiring a DBS check). It will be necessary for the candidate to complete a DBS form. DBS forms for staff will be supplied via Human Resources and for students by the PVO in an Academic Department/Faculty.



## Protocol 1- Safeguarding in staff recruitment

For roles involving contact with children or vulnerable individuals or researching sensitive and secure materials, the following steps must be taken when recruiting staff:-



## **Processing Applicants' Documentation**

1. The Human Resources Department will issue a DBS form to the successful candidate for a post which requires the post-holder to have a DBS check. An authorised individual in the HR Team will ensure that the form has been completed and relevant documentation checked in accordance with the Completion of DBS Forms, Guidance and the DBS guidance notes which accompany applications to assist in accurate completion.
2. The appropriate department for paid student ambassadors, students, mentors etc. will issue a DBS form to the successful candidate if they are not already registered for a post which requires the post-holder to have a DBS check. The PVO in the departmental team / Institute will ensure that the form has been completed and relevant documentation checked.
3. If an individual is appointed to a post for which a DBS is required but clearance has not been received, the Head of Department will be informed so that a risk assessment can be undertaken and appropriate supervision put in place, if necessary.
4. The appropriate DVO will discuss with the Lead Signatory information provided on a Disclosure that may mean that the offer of employment has to be withdrawn. In this situation the Disclosure information will be fully discussed with the applicant before withdrawing the offer of employment.

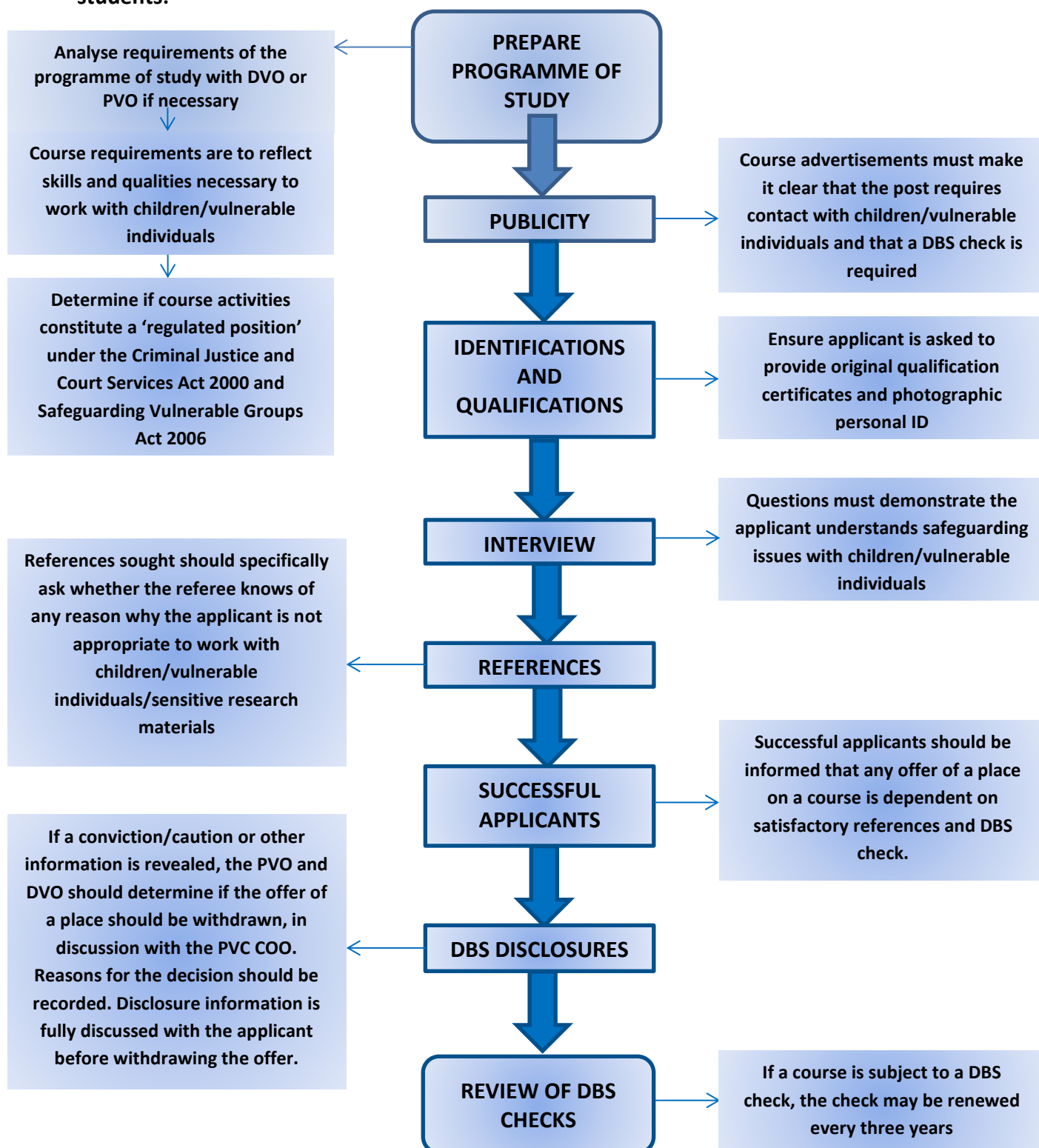
## Protocol 2- Safeguarding in student recruitment / activities

It is the responsibility of Heads of Departments to identify all courses involving compulsory elements which involve contact with children and/or vulnerable individuals, which meet the requirements for a DBS check. This should be carried out as a part of the normal admissions process, and usually by the PVO for that Department/Institute.

The relevant Schools and other outside agencies should then be provided with confirmation of appropriate DBS checks.

The checklist below outlines steps which should be taken at different stages of the student recruitment process.

**For courses/roles involving contact with children or vulnerable individuals or researching sensitive and secure materials, the following steps must be taken when recruiting students:-**



## **Processing Applicants' Documentation**

The Academic Department/Institute will issue a DBS form to the successful applicant for a course which requires the applicant to have a DBS check. The PVO will ensure that the form has been completed and relevant documentation checked.

# Safeguarding Code of Conduct

## 1. Values and Principles

Aberystwyth University has a responsibility to provide a safe environment for vulnerable individuals and will take seriously any suspicions or allegations of abuse, inappropriate behaviour or concerns regarding potential radicalisation and respond appropriately.

## 2. Aims of the code of conduct

The Code of Conduct aims to help Aberystwyth University provide a positive and supportive environment for vulnerable individuals. It is intended to:-

- provide guidance for staff on good practice in working with vulnerable individuals or those at risk of radicalisation;
- reduce the risk of harm to vulnerable individuals or those at risk of radicalisation;
- reduce the risk of complaints or allegations being made against staff;
- ensure compliance with the Prevent Duty.

## 3. Who does the Code of Conduct apply to?

The Code of Conduct relates to all vulnerable individuals/those at risk of radicalisation who participate in or are affected by University activities, whether or not they are accompanied by their parents, including:-

- students;
- staff or volunteers;
- vulnerable individuals attending public events on University premises;
- vulnerable individuals in the care of staff or students;
- vulnerable individuals in contact with staff through placements or research activities.

## 4. Guidance on behaviour towards vulnerable individuals

The University expects all members of staff to treat vulnerable individuals with the same professional standards of respect and care given to other students or members of the public. However, in your contact with vulnerable individuals, you should also take into account:-

- the developmental needs of the vulnerable individual when planning activities;
- additional legal requirements or responsibilities due to the vulnerable individual's age. This might include considerations such as the age of consent; drinking alcohol; gaining the consent of a parent or guardian to activities;
- The University's responsibility under the Prevent Duty.

Use positive and appropriate language:-

- avoid swearing
- never shout or use derogatory language
- challenge inappropriate language by vulnerable individuals
- never address sexually suggestive jokes or comments to any individual

Use physical contact carefully:

- be aware that any kind of touching or physical contact can be misinterpreted
- where physical contact is justified, use it openly
- if a vulnerable individual is in distress, use a touch on the hand or shoulder rather than a hug
- do not play rough physical games with vulnerable individuals.

Avoid being alone with a vulnerable individual:

- in tutoring or mentoring situations, meet in open places or leave the office door open if possible
- do not arrange to meet a vulnerable individual alone unless as part of a specific role such as an individual tutor
- on residential premises, never enter a vulnerable individual's room unless it is absolutely necessary. If you do enter a vulnerable individual's room you should be accompanied by another adult
- do not give lifts to a vulnerable individual

## **5. Guidance on sexual relationships**

5.1 Members of staff should be aware that sexual intercourse and other sexual activity with a child under the age of 16 years and certain categories of vulnerable individuals are criminal offences. Any incidents will be reported to the Police.

5.2 Members of staff should be aware that individual relationships with a participant in Aberystwyth University activities who is capable of giving legal consent may nevertheless give rise to professional conduct issues; the provisions of the University's policy on Family Relationships should be followed as appropriate (see para 1.15 Family Relationships, Quality Handbook).

5.3 If you feel that a vulnerable individual is behaving in a manner which is inappropriate you should report this to the Designated Reporting Officer.

## **6. Guidance on alcohol**

Children under 18 should not be encouraged to drink alcohol. You should not buy a drink in a pub for a child under 18.

## **7. Guidance on photography**

As with all students, written consent must be gained for photographs or video. In the case of children under 16, the written consent of parents or guardians must be gained.

## **8. Guidance on the Prevent Duty**

Universities must demonstrate an awareness and understanding of the risk of radicalisation in their institution and do their utmost to prevent individuals from being drawn into terrorism. Potential concerns regarding the radicalisation of an individual should be reported under this policy.

## **9. What to do if you are worried about a safeguarding issue?**

- 9.1 Any member of staff may report a safeguarding concern. You should not assume that someone else has raised a concern simply because other members of staff may have more direct contact than you with the individual. You might raise an issue of concern if:-
- you have witnessed an incident in which an individual is harmed or abused;
  - an individual has disclosed or hinted at abuse or harm to self or others (including potential risk of radicalisation);
  - you have concerns about an individual because of their behaviour or appearance. This might include seeing injuries, or signs of distress such as uncharacteristic lack of self care, showing fear, anxiety, withdrawal or depression, making threats/statements inciting hatred at others;
  - you have concerns about an individual because of their behaviour or because of something they have said or alleged to have said or done.
- 9.2 You may raise concerns about any individual for whom you are concerned. The vulnerable individual does not have to be a student or participant in Aberystwyth University's programmes or activities. For example, an adult student might disclose information in relation to a child; or the behaviour of an adult student who has the care of a child might give rise to concern.
- 9.3 You should report your concern, even if it seems trivial, to the Designated Reporting Officer (DRO).
- 9.4 If you think that the individual is in immediate danger of serious harm, you should phone the police (999).

## **10. Guidelines for what to do if an individual discloses abuse to you**

If an individual tells you about abuse they have experienced, this can be a difficult and distressing experience. The guidelines below can help both you and the individual concerned.

Listen and show concern

Assure the individual that it is right for them to be telling you. Don't interrupt.

Don't ask too many questions – especially not leading questions. Your role is not to establish exactly what happened. Do not in any way formally interview the individual nor hold any enquiry into the allegations. Simply make a record of what has been said to you keeping strictly to the facts. Remember not to make any judgement or give an opinion regarding the allegations disclosed to you. Do not agree or disagree, accept or reject.

Do not express strong emotions, e.g. of shock or anger. If you show strong emotions it can add to the vulnerable individual's anxiety or feeling that they are 'causing trouble'.

Don't make promises which cannot be kept

Let the individual know that you take what they have said seriously but don't make promises you can't keep such as 'it will all be ok now'.

Don't promise to keep it confidential. Let the individual know that you will pass the information on to those who need to know.

#### Make a record

Write down as soon as possible all you can remember of your conversation. Use the individual's own words as much as you can remember. Note down what you said and did. Keep the original notes.

#### Self care

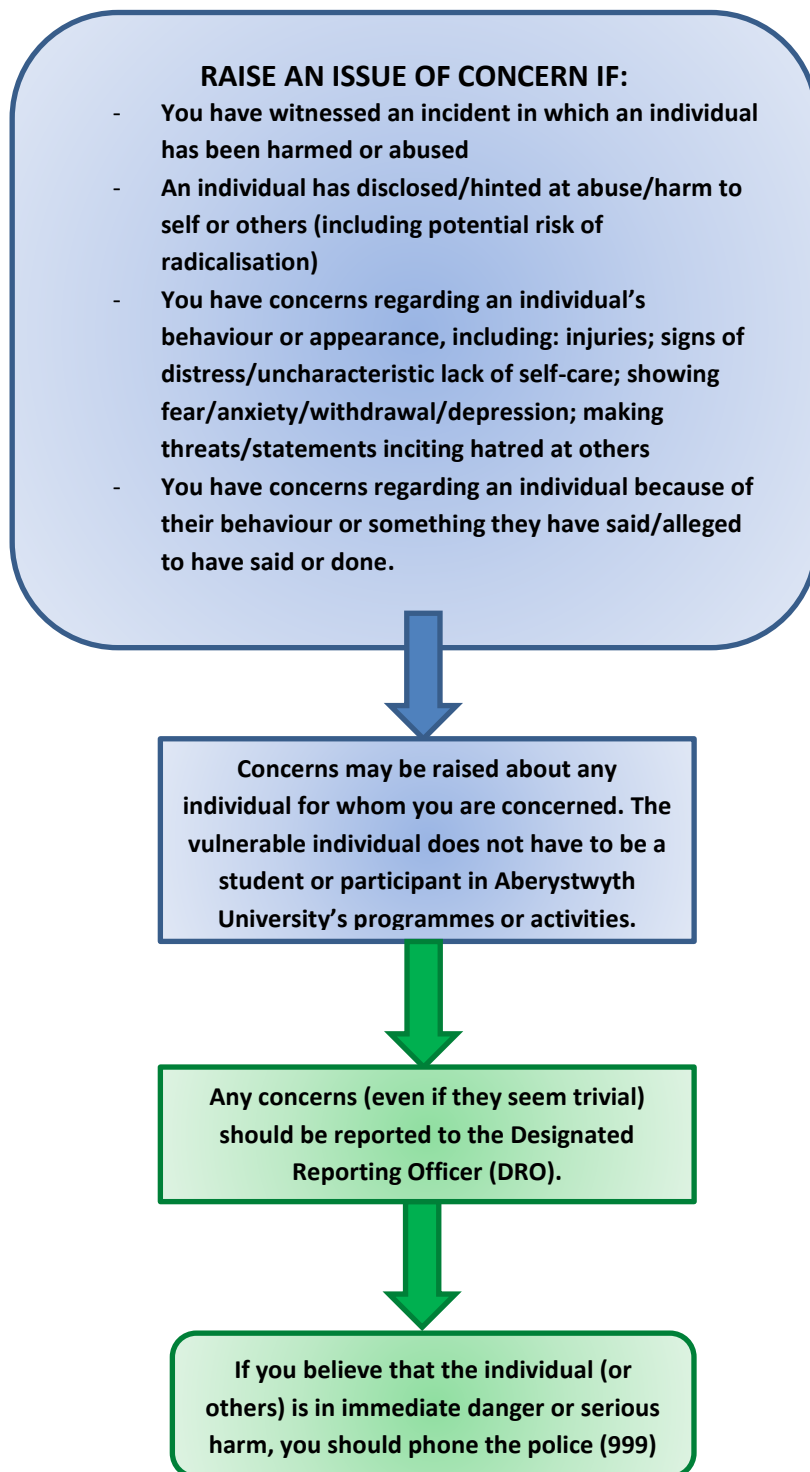
Receiving information about abuse can be upsetting. Seek advice and support for yourself. The DRO can advise on next steps and the University provides support for staff through its Employee Assistance Programme <https://www.aber.ac.uk/en/hr/employment-information/eap-carefirst/>

## **11. Confidentiality**

- 11.1 Vulnerable individuals have the same right to confidentiality as adults. Concerns about individuals will be treated as sensitive information which will be carefully stored; shared with the minimum number of people necessary; and anonymised in reporting whenever possible.
- 11.2 It is important to note that the need to protect individuals overrides the right to confidentiality – please see University Confidentiality Guidelines for more details.



## Reporting a safeguarding concern flowchart:



## ACTION TAKEN FORM

<b>Name of Designated Reporting Officer:</b>	
<b>Name of individual concern has been expressed about:</b>	<b>Date of incident:</b>
<b>Nature of allegation/concern</b>	
<b>Action taken:</b>	
<b>Name and contact details of the duty officer at Social Services/Police that the allegation or concern has been reported to:</b>	

<b>Signed (Designated Reporting Officer):</b>
<b>Position:</b>
<b>Date:</b>

**PLEASE CONTINUE ON TO ANOTHER PAGE IF NECESSARY, ENSURING IT IS SECURELY ATTACHED TO THE ACTION TAKEN FORM.**