

Safeguarding Policy

1. POLICY AIMS

The University recognises that it has a duty to safeguard individuals as part of its commitment to equal opportunities, diversity, the Prevent Duty and the provision of a safe working and learning environment. The definition of Safeguarding can be found at [Appendix 1](#) (pg. 19).

The aims of this policy are to:-

- 1.1. Reflect the legislative context and take account of relevant guidance and good practice relating to safeguarding and safeguarding in the education sector (See [Appendix 3](#) for details);
- 1.2. Ensure that appropriate measures are in place to safeguard against abuse, neglect or harm involving children, young people and adults at risk ([See Appendix 19](#)) for definitions including child, young person and 'vulnerable' adult in the context of safeguarding) who may be encountered through teaching, research, outreach, or other activities;
- 1.3. Ensure that staff obtain research ethics approval prior to undertaking any research which may have safeguarding considerations. For further details please refer to [Appendix 4.2](#), [Appendix 5.9](#) and [10](#).
- 1.4. Assist staff to recognise their responsibilities and ensure they are aware of the procedure they should follow if they suspect a vulnerable individual is experiencing or is at risk of experiencing harm;
- 1.5. Set out how the University will deal with concerns that are raised and the type of action that the University may take to manage such matters;
- 1.6. Provide an assurance to all students, staff, volunteers, contractors and visitors that safeguarding is treated seriously by the University and the requirements of this policy will be undertaken / discharged in an effective and timely manner, and in keeping with the requirements of the Welsh Language Standards ([see point 18](#)).

2. SCOPE

This Policy applies to all University activities and facilities and covers:-

- All staff employed by the University;
- All students registered and studying (including distance learners) at the University;
- Volunteers and contract workers engaged on behalf of the University;
- All circumstances where visitors including children, young people under the age of 18 and adults at risk attend University premises and /or participate in University activities;
- Both on and off campus settings e.g. placements, work-based practice and learning exchanges and field trips.
- N.B. This list is not exhaustive. Further examples can be found in [Appendix 2](#).

3. RELEVANT LEGISLATION, POLICIES AND PROCEDURES

3.1. Vulnerable individuals:

In relation to working with children, young people and adults at risk, staff should adhere to all legal requirements and procedures as well as have regard to any guidelines produced by the appropriate professional bodies. Details of the relevant legislation and guidance can be found in [Appendix 3](#).

3.2. The Prevent Duty

Aberystwyth University has a statutory duty to play its part in the Government's strategy to prevent terrorism by reducing the possibility of radicalisation by having 'due regard to the need to prevent people from being drawn into terrorism' (taken from the [Counter-Terrorism and Security Act 2015](#)).

However, the University's approach to Prevent is not simply about identifying those at risk of being drawn into terrorism, but to ensure that individuals facing challenges and difficulties receive proper support. This is framed by our commitment to the wellbeing of our students and staff and the safeguarding of all potentially vulnerable individuals.

Therefore, the University's response to the Prevent duty is guided by our institutional values of inclusiveness and collaboration and our commitment to

ensure that everyone on campus is treated fairly, with dignity and respect, and in a supportive and welcoming environment. Further details about our [Prevent Duty](#)

3.3. Domestic Abuse

The University takes seriously the need to create and maintain a safe and secure environment in which employees can reach their full potential. In this context, there are a number of underlying and supportive initiatives regarding the safeguarding of employees potentially at risk of harm from social and domestic abuse. Further details, including guidance for managers, support for employees including signposting to external professional agencies can be found in the University's [Domestic Abuse Policy Statement](#)

Any employee who is experiencing, or has experienced, domestic abuse, sexual violence and/or stalking is strongly encouraged to disclose such behaviour(s) under the Domestic Abuse Policy Statement. The University is committed to dealing with any such disclosure in a supportive and, where possible, confidential manner.

4. 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 with staff and students of this policy and the relevant local procedures;
- Is committed to ensuring that appropriate procedures are in place to enable it to discharge its duties and to ensure that cases of suspected abuse or neglect of vulnerable individuals or concerns re potential radicalisation are dealt with sensitively and effectively in accordance with the law and relevant guidance;
- Is committed to ensuring that investigations into reports of suspected abuse, neglect or potential radicalisation are carried out in a fair and timely manner;
- Is working 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;

- Is committed to ensuring that all allegations of abuse or neglect of vulnerable individuals or potential radicalisation are reported and responded to.
- Further details by activity and responsibility can be found at [Appendix 4](#).

5. DEVELOPING LOCAL PROCEDURES

Any local procedures and codes of practice developed by a specific research group, faculty or department will be subject to approval by the Safeguarding Group and will be available on the Safeguarding page of the University's website unless restricted due to their sensitivity. Further copies will be available locally within departments. All such procedures will operate within the principles set out in [Section 4](#) of this policy.

SAFEGUARDING ROLES AND RESPONSIBILITIES

The University has the following designated roles with safeguarding responsibilities:

- Lead Safeguarding Officer (LSO)
- Designated Reporting Officer (DRO)
- Principle Safeguarding Officer (PSO) – Students
- Principle Safeguarding Officer (PSO) – Staff
- Departmental Safeguarding Officers (DSO)
- Departmental Research Safeguarding Officers (DRSO) (where appropriate)

Details of the safeguarding roles and responsibilities can be found at [Appendix 5](#).

In addition, the University has a [Safeguarding Group](#).

The Safeguarding Group is responsible for the development, implementation, monitoring and review of the University's Safeguarding Policy and its application and for approving departmental procedures in line with changes in legislation and best practice guidance. When changes are made to the policy, it will be dated and the approved version signed by the Chair of the Safeguarding Group.

The Lead Safeguarding Officer will chair the Safeguarding Group. Full membership of the group and its terms of reference can be found at [Appendix 6](#).

6. VERIFICATION PROCEDURES

The University has a legal requirement to ensure that appropriate verification procedures are undertaken for staff, students and volunteers who work with children, young people and adults at risk.

Where a role or activity involves substantial, unsupervised access to children, young people or adults at risk on a sustained or regular basis the University will require staff, volunteers and students to disclose any criminal records they may have by undertaking a Disclosure and Barring Service (DBS) check at the appropriate level.

It is recognised best practice to update the DBS status of individuals in Aberystwyth University every three years. Heads of Department are responsible for ensuring staff members have their DBS status updated, and DSOs within Faculties/Departments are responsible for ensuring student DBS statuses are updated every three years.

Further details about the DBS service, checks available and the Lead Signatory for the University can be found [at Appendix 5](#) and [12](#).

STAFF AND STUDENT RECRUITMENT

The University will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children, young people and adults in a vulnerable situation.

- [Protocol 1a](#)
- [Protocol 1b](#)

7. VOLUNTEERS

For the purpose of this policy, a volunteer will be treated in the context of being an employee or student and if there is appropriate involvement with vulnerable groups will fall under the remit of the respective PSO.

8. WORK EXPERIENCE

When work or work experience is offered to young people, the University owes that person the same or a higher level of duty of care for their health, safety and welfare as for all other employees or volunteers. There may be risks that may be specific to the

work activity or an increased risk for young people and all potential risks must be documented in the risk assessment. Where there is significant risk, these must be discussed with the young person (and in many cases also with the school or college) prior to them commencing their work experience. There may be certain work activities, work environments or specific types of equipment with which the young person will not be able to engage due to tighter regulatory restrictions laid down in specific pieces of legislation and/or stated within certain University policies. For further details about work experience for young persons, see [Appendix 14](#) and [15](#).

9. RISK ASSESSMENT

All staff that intend to, or may be put in the position of working with children, young people or adults in a vulnerable situation should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

A designated individual should complete a risk assessment before any new or changed programme, event, visit or any other activity involving vulnerable individuals or before admitting or employing under-18s.

All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

Further information about [Risk Assessments](#)

10. DUTY TO REPORT SAFEGUARDING CONCERNS

The recognition of abuse or harm is not always easy and the University acknowledges that its employees may not be experienced in this area and will not easily know whether it is taking place. For example, it may be that the behaviour that causes concern is bad practice rather than abuse. Indeed, it is not the place of staff or students in general to make such a judgement. However, the University recognises that it has a responsibility to act on any concerns in order to safeguard the welfare of 'at risk' groups.

It is the University's policy that:

[a] If any member of staff, any student or volunteer has knowledge of concerns or suspicions that a child, young person or at risk adult is suffering, has suffered or is

likely to be at risk of harm, then they must refer the matter to the DRO who will liaise with the relevant statutory agencies and inform the LSO and PSOs. If the matter is very serious or urgent and the DRO cannot be contacted, the individual raising the concern should contact the police directly (and subsequently report the matter to the DRO).

[b] Alternatively, if any member of staff, student or volunteer has specific concerns relating to a child, young person or at risk adult's safety or welfare on any programme or, activity during their use of University facilities they can raise the matter, in the first instance, with their Faculty PVC, Head of Department or Head of Professional Service who must then report the concerns to the DRO (in accordance with 12a above) on their behalf.

c) Where an allegation of abuse or inappropriate behaviour is made, by a student, staff member, contractor, visitor, etc., against a member of staff and relates to their actions as an employee of the University, the matter must also be reported to the Director of HR & Organisational Development (HR&OD) or depute who will provide advice and guidance in respect of the contractual position and relevant procedures that may apply. In the case of allegations against students these must also be reported to the relevant Faculty Registrar.

d) Upon receiving a report, the DRO must assess whether they should report the concerns to the officer in the relevant Authority(s) e.g. Social Services and where appropriate to the Police. In addition, immediate measures may be put in place by the DRO to ensure that the child or vulnerable individual is safe and that any necessary evidence is protected.

11. SUSPENSION

If appropriate, the DRO should immediately inform the Lead Safeguarding Officer that it may be necessary to suspend the person. This must be done in accordance with the relevant staff or student policy. Where exclusion of any other individual from University premises is proposed, this must be done under the appropriate University procedures pending determination of the issue.

The Lead Safeguarding Officer must raise the proposed suspension of a member of staff with the Director of HR&OD who will follow the appropriate policy and procedure for consideration of suspension of the member of staff.

The Lead Safeguarding Officer must raise the proposed suspension of a student with the PSO for students/Academic Registrar who will follow the appropriate policy and procedure for consideration of suspension of the student.

It is important that any response is properly co-ordinated and that events are managed in the right order. For this reason, the University will consider taking no direct action without the advice and agreement of the investigating agencies (e.g. the Police, NSPCC or Social Services), except where such action is necessary to protect an individual and as a precautionary measure.

If, following consideration and any consultation, the concern is clearly about bad practice rather than abuse, the University will take the necessary action to advise, manage or instigate disciplinary action against the person about whom the allegation has been made.

Irrespective of the outcome of any Police or Social Services investigations, the University may consider disciplinary action in accordance with its Disciplinary Procedures:

- [Staff](#) Disciplinary Procedure
- [Students](#) Disciplinary Procedure

Every effort should be made to maintain confidentiality. Suspicions must not be discussed with anyone else on campus other than those essential to the investigation or process.

STORAGE, HANDLING AND RETENTION OF DOCUMENTS (Students and Staff)

The [General Data Protection Regulation \(GDPR\) 2018](#), or more specifically the [Data Protection Act \(DPA\) 2018](#), allows for the processing of data for PREVENT purposes.

This policy and its application conforms with the requirements of the DPA 2018 and all data in relation to safeguarding issues concerning students, staff, contractors and visitors will be gathered, stored, handled, disclosed and destroyed in accordance with that Regulation.

Detailed information concerning disclosure and allegations 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 containers with access strictly controlled and limited to those who are entitled to see the information as part of their duties. Further information concerning data protection can be found at [Appendix 17](#).

12. TRAINING AND GUIDANCE

It is essential that training is provided for key staff, students and volunteers on relevant issues connected with this policy. Training for all categories of Safeguarding Officer is required on a regular basis (normally every two years) and when policies and procedures substantially change.

Any member of staff planning activities with/for children or adults at risk is required to undertake appropriate training. For staff with identified safeguarding roles, such training will be mandatory.

The University will provide training and briefing sessions for relevant staff, students and volunteers from time to time. Information on training can be found in the Staff Development Programme on the HR website and on its Safeguarding pages.

The training will be overseen and arranged by the Safeguarding Group which will collaborate with relevant partnerships and agencies in order to raise awareness and understanding of safeguarding matters.

13. PREVENT TRAINING

All staff must undertake the mandatory PREVENT training which is available via Blackboard <https://blackboard.aber.ac.uk/>.

14. WELSH LANGUAGE – INDIVIDUAL RIGHTS

In accordance with the [Welsh Language Standards](#) that came into effect on 1 April 2018 individuals have the right to use the Welsh language when making or responding to a complaint. Further details can be found in [Appendix 20](#).

15. POLICY IMPLEMENTATION AND REVIEW

The Safeguarding Group will co-ordinate a review of this policy annually in order to maintain compliance with legislation and good practice. The review will be undertaken in liaison with the recognised trade unions and any proposed amendments will be submitted to the University Executive and the appropriate relevant committee(s) as required.

16.IMPACT ASSESSMENTS

The University is committed to embedding the Equality Scheme into its policies, procedures and practices. This policy has been equality impact assessed in accordance with this scheme.

The University is committed to embedding the Welsh Language Standards 2018 in its policies, procedures and practices. This policy has been Welsh language impact assessed in accordance with these standards.