



## **Policy for Safeguarding**

Key Contacts:

To raise a concern: email: [safeguarding@worc.ac.uk](mailto:safeguarding@worc.ac.uk)

Safeguarding Lead for Students:

Safeguarding Lead for Staff: Director of HR

Chair of Safeguarding Committee: Provost

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## 1. Purpose

- 1.1 This Policy for Safeguarding (the “Policy”) outlines the key principles that the University holds in the context of safeguarding children and vulnerable adults. The definitions of both the terms ‘children’ and ‘vulnerable adults’ are defined within the Policy at paragraph 2.3.
- 1.2 In the event of an allegation of abuse or neglect in relation to children or vulnerable adults, separate [guidance](#) is available to offer support and advice to students and staff on how to record a concern. All concerns should be raised and reported through [safeguarding@worc.ac.uk](mailto:safeguarding@worc.ac.uk) as set out at paragraph 5. Further guidance and information can be found on the ‘[Safeguarding at the University](#)’ Webpage.

## 2. Overview

- 2.1 Safeguarding is a term used to describe actions taken to prevent vulnerable groups being subject to harm.
- 2.2 Safeguarding practices are most commonly applied to children and young people under the age of 18. Throughout various pieces of legislation and guidance, the two terms are sometimes differentiated, where ‘children’ refers to those under the age of 18 who are still in full-time education, and ‘young people’ refers to those under the age of 18 who have left full-time education.
- 2.3 For the purposes of this Policy, the following definitions apply:
  - 2.3.1 A ‘child’ is defined as any person under the age of 18.
  - 2.3.2 A ‘vulnerable adult’ is defined as any person aged 18 years or over who is experiencing or at risk of abuse or neglect; who is unable to protect themselves because of illness, disability or age; and who is in need of care and support of community services.
- 2.4 The University has specific guidance in relation to the admission of students under the age of 18, which can be found in the [Admissions Policy](#). In summary, this states that the University is an adult environment, and consent is required from a parent or legal guardian of a student under the age of 18 prior to their entry to the University.
- 2.5 Whilst schools and Further Education colleges have a statutory duty to safeguard and protect children in their care, Higher Education institutions such as the University are not subject to this same duty. However, the University is subject to the common law duty to take such steps to ensure that reasonable, foreseeable harm does not occur by way of its omissions or careless acts.
- 2.6 This Policy is also predicated upon the University’s value of encouraging social responsibility, whereby all members of the organisation, be they students or staff, are expected to protect the interests of the wider community.
- 2.7 The Policy sets out the University’s position on safeguarding upon which specific, detailed procedures may be added by departments depending on the localised need and subject to approval by the University Safeguarding Committee. Such needs typically include the

requirements of external professional bodies (such as Ofsted or the Nursing and Midwifery Council) but will also include specific procedures with regard to, for example, accommodation of children on campus or security arrangements at a variety of university locations.

2.8 This Policy should be read in conjunction with the University's policies on [Admissions](#) (specifically the policy statement on students with criminal convictions), Whistleblowing and the Procedure for Managing Disclosure and Barring Service Checks. Safeguarding is however relevant to many of the University's activities, policies and procedures.

2.9 This Policy is designed in accordance with the following key themes:

- Protection: of vulnerable adults and children.
- Legal: ensuring that the University complies with its legal obligations.
- Reputation: that students and staff do not allow the reputation of the University to be damaged through their own inappropriate action or their response to inappropriateness by others (either staff, students or the public).
- Accessibility: for staff or students in managing risk and operating procedures.

### 3. [Scope](#)

3.1 This Policy applies to all members of the University, including students, staff, workers, apprentices and volunteers.

3.2 It is expected that external bodies, organisations and users of the University's premises or facilities for external events will have their own safeguarding policies and procedures and will take full responsibility for the safeguarding of individuals involved in those events.

### 4. [Roles and Responsibilities](#)

4.1 The University is committed to providing a safe environment for all students, staff and individual visitors who access its facilities and services.

4.2 Staff and students have an individual responsibility to understand this Policy, mitigate the risk of harm to vulnerable adults and children and act appropriately and in accordance with this Policy in situations involving children and/or vulnerable adults, both on university premises or when working or studying at other sites.

4.2.1 The Safeguarding Committee aims to recognise and promote the importance of safeguarding vulnerable adults and children. The Safeguarding Committee will maintain oversight, and keep under review, training provided to staff on the implications of this policy.

4.3 Subject to the reporting procedure set out below, the University may refer concerns that children on University premises might be at risk of significant harm to [Worcestershire Children First](#) and/or the Police. Concerns that vulnerable adults might be at risk may be referred to [Worcestershire Safeguarding Adults Board](#). In cases where domestic and/or sexual abuse is disclosed, referral will be made to appropriate support agencies or the Police (with consent) or to the [Multi-Agency Risk Assessment Conference \(MARAC\)](#) (with or without consent). In any such cases, referrals to external bodies should only be made by the Safeguarding Lead or nominee.

- 4.4 All personal data will be processed by the University in accordance with its Data Protection Policy and the requirements of the relevant data protection legislation (GDPR and Data Protection Act 2018).

## 5. Reporting a Concern

- 5.1 If an allegation of abuse or neglect involving a child or vulnerable adult at the University is made to a member of University staff, the individual making the allegation must be taken to a safe, private place and a clear and comprehensive summary of the allegation must be made and the contact details of the reporting party must be obtained. A template reporting form is provided to assist with this record at Appendix 2 in this guidance document: [[responding to allegations of abuse and neglect](#)]. The member of staff receiving the allegation will be responsible for notifying the Safeguarding Lead for Staff or Safeguarding Lead for Students. The Safeguarding Leads can be contacted at: [safeguarding@worc.ac.uk](mailto:safeguarding@worc.ac.uk)
- 5.2 The Safeguarding Leads will assist staff in talking through any issues that may, or may not, be considered safeguarding issues under the terms of this Policy and the appropriate course of action. No attempt should be made to investigate the allegation by members of staff directly.
- 5.3 Should an allegation of abuse or harm involving a child or vulnerable adult at the University be made to a student of the University, or if a student has a safeguarding concern, that student should inform their Course Leader, Personal Academic Tutor or the Safeguarding Lead for Students as soon as possible. Should the allegation be made on a designated work placement, the employer's policy or process should normally be followed.
- 5.4 Where a member of staff has a safeguarding concern relating to a child or vulnerable adult at the University and the situation is not an emergency, the individual should inform the Safeguarding Lead for Staff or Students (as appropriate). The Safeguarding Lead will consider all of the information and advise on the appropriate course of action.
- 5.5 Where a member of staff or student has a safeguarding concern relating to a child or vulnerable adult in emergency circumstances (i.e. there is a certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed) the individual should contact the Security Team or the Police. The Safeguarding Lead for Staff/Students should be informed immediately afterwards.
- 5.6 Independent contractors should report any safeguarding concerns to their contact at the University in the first instance, typically a member of the Facilities or Information Learning Services team.
- 5.7 In the event of safeguarding concerns about a student, please refer to the Safeguarding students [flowchart](#) to identify the most appropriate action.

**In the event of an emergency, contact should be made with the University's Security Team or the Police.**

## 6. Disclosure and Barring (DBS) checks

- 6.1 The University has specific responsibilities in relation to the employment of individuals who undertake specific activities involving children and vulnerable adults.

- 6.2 The University therefore maintains policies and processes relating to [Recruiting, employing and managing people with criminal records](#) for both work and study.
- 6.3 The University has a duty to refer individuals to the DBS in certain circumstances if they have been removed from working in regulated activity with children and/or vulnerable adults because they caused harm to children and/or vulnerable adults or posed a risk of causing harm. The University is also under a legal obligation not to knowingly permit an individual to engage in regulated activity where it knows that individual is barred for working with children and/or vulnerable adults. As such, the University will report to the DBS any concerns it has that a University member (or former University member) of staff, or a student (or former student) ought to be included in any list of people who should be restricted from working with children or vulnerable adults in accordance with its statutory obligations.
- 6.4 **Staff**
- 6.5 Any member of staff who undertakes ‘regulated’ activity as set out in the relevant legislation may be eligible for a DBS check. Importantly, individuals must only be required to obtain a DBS check where they are engaging in regulated activity, and the University will not require DBS checks on the “off chance”
- 6.6 Further information on when the University requires staff to undergo DBS checks is set out in the [Procedure for managing DBS checks]. In particular, policies cover organisational responsibilities as determined by the [Rehabilitation of Offenders Act \(1974\) and Exceptions \(1975\)](#) as well as the [Safeguarding Vulnerable Groups Act 2006](#) and the subsequent [Protection of Freedoms Act 2012](#).
- 6.7 **Students**
- 6.7.1 Where students are entering into regulated activity involving children and/or vulnerable adults, they will normally be required to obtain a DBS check (and/or Barred List check) prior to registration on the course. Otherwise, this requirement will be necessary prior to their taking up the regulated activity. Such requirements will be clearly stated in the University prospectus and on entry profiles and will be communicated to students as necessary.
- 6.7.2 Where students hold a criminal conviction (either spent or unspent) they are advised to check the detail of the [University Admissions Policy](#) .
- 6.7.3 The University recognises that some organisations may require DBS checks (or Barred List checks) for individuals undertaking regulated activity or working with vulnerable groups as a matter of policy. In such cases, the member of staff responsible for establishing the contact with such organisations (typically the Line-Manager or Course Leader) must ensure that HR or individual students are aware of any such requirements with sufficient time to allow for any checks to be carried out. Staff and students are alerted to the fact that this may be the case following temporary withdrawal (formerly ‘intercalation’) from a programme or course.
- 6.7.4 Where, after commencement of employment or study, a person commits a criminal offence that requires reporting to the DBS under legislation, this will be done by the Director of HR (Safeguarding Lead (staff)) (in the case of staff) or the Academic Registrar or the Safeguarding Lead (Students) (in the case of students).

## 7. Training and Development

- 7.1 The University expects that, where deemed relevant by academic staff or prescribed by professional bodies, students will be taught about safeguarding issues and relevant legislation as part of their academic provision.
- 7.2 Staff will be made aware of safeguarding issues through induction and periodic training or briefing sessions, as well as via online media as appropriate. In particular, Heads of Department in areas where safeguarding issues are likely to be particularly prevalent, such as Admissions, Student Services, Security, Accommodation, International and HR take responsibility to ensure that relevant staff are kept up to date with legislation and practical advice and guidance as appropriate.

## 8. Counter Terrorism and Security (Prevent duty)

- 8.1 The [Counter Terrorism and Security Act 2015](#) means the University must “have due regard to the need to prevent people from being drawn into terrorism” (Section 26). The University must also “have particular regard to the duty to ensure freedom of speech” and “to the importance of academic freedom” (Section 31). Under Section 29, the University must “have regard to any such guidance in carrying out that duty”.
- 8.2 The University is complying with this duty in all its aspects, which in practice means striking a fine balance between concerns around extremism and concerns around censorship. As such, the University has established a [Code of Practice on Freedom of Speech](#) which sets out the key principles against which it adheres.
- 8.3 Where there is reason to believe that a student or a member of staff to whom this Policy applies may be at risk of being drawn into terrorism, individuals should contact the Prevent Leads for advice ([prevent@worc.ac.uk](mailto:prevent@worc.ac.uk)).

**In the event of an emergency, contact should be made with the University’s Security Team or the Police.**

## 9. Lone Working

- 9.1 Lone working is the term used to describe situations whereby staff and/or students work with an individual (e.g. another staff member, student or a member of the public) in a one-on-one situation. The University recognises that such working is an important and necessary aspect of many roles, including (but not limited to) academic staff, researchers, Student Services staff and students following professional awards, such as Midwifery or Social Work.
- 9.2 Generally, staff are encouraged to consider the [Guidance on Lone Working](#) produced by the Health and Safety Executive (“HSE”) and also further guidance available and issued by specific Academic Institutes/Schools or Professional Departments and from Safety Services at the University. The HSE Guidance places emphasis on safety in the workplace. Students are advised to utilise this Guidance although it is expected that, where Lone Working is an integral aspect of provision (such as for many students following Health-related or Education awards), additional support and guidance will be offered by Course Teams within individual Schools. Such support and guidance will correspond with this Policy.
- 9.3 Where students are on placements, students should be made aware of any policies of the employer, including those relating to lone working.

Where lone working is to take place between University staff and children or vulnerable adults, a risk assessment must be undertaken which addresses the following :

- Confirmation of the need for lone working with the child or vulnerable adult;
- Measures to ensure the safety of the child or vulnerable adult and of the member of staff/student;
- The process to be followed in the case of safeguarding concerns as set out in Section 5 of this Policy;

Further advice is available from the Safeguarding Leads ([safeguarding@worc.ac.uk](mailto:safeguarding@worc.ac.uk))

## 10. Public Interest Disclosure/Whistleblowing

- 10.1 The University has a specific policy on [Whistleblowing](#), which outlines the process to be followed when staff or students have concerns relating to the practices of the University .
- 10.2 Should students identify cause for concern whilst on placement these should be raised in accordance with the advice or guidance set out in the relevant course placement handbook. Students may also seek advice from their university placement mentor, course leader or Personal Academic Tutor.

## 11. Children on University Premises

- 11.1 The University has obligations under health and safety legislation to ensure its premises and environment are safe and children are not exposed to risks to their health and safety. Children are less likely to be aware of health and safety risks, and physically and/or mentally immature due to their age compared to students over the age of 18. This part of the Policy sets out the general arrangements, and certain prohibitions to be followed to ensure that risks to children are minimised while they are on university premises or involved in, or affected by, University activities. University premises in this context include all buildings, grounds, roadworks and vehicles owned or leased by the University.
- 11.2 The University recognises that there are a number of occasions on which children may be present on University premises or in the temporary care of University staff and/or students. These will include, but are not limited to, the following:
- Organised visits, summer schools and other outreach activity on University premises;
  - Attending, either accompanied or unaccompanied, University Open Days, Visit Days, interviews, etc;
  - Outreach activities undertaken in schools and other venues away from University premises;
  - Attending University premises for educational, sporting, recreational or social purposes;
  - Under 18s employed by the University;
  - Under 18s carrying out work experience at the University;
  - Staying in University-managed accommodation either overnight or for extended periods;
  - Attending school holiday clubs;
  - Attending the University Library (The Hive)\*; or
  - Being the subject of research by University staff or students;

\*Notwithstanding that this is a public space, and that responsibility is shared between the University and the County Council.

11.3 Children may also be registered as students of the University. Please see the [Admissions Policy](#) for further information and detail on the arrangements for students at the University who are under the age of 18.

11.4 Specific regulations, particularly relating to health and safety, apply to all visitors to University premises (e.g. there are specific rules and conditions relating to the use of University transport). Relevant reference to such regulations is identified through this Policy. Additionally, the following restrictions apply:

- a. Children are only permitted in laboratories or other hazardous areas where this has been pre-agreed by the relevant Head of School or Head of Department and arrangements have been made to mitigate appropriate risk.
- b. As per [Joint Academic Network \(JANET\)](#) regulations, children are not permitted to use computers logged onto the University intranet, unless prior arrangement has been made with the Chief Information Officer or their delegate.
- c. Children should only enter designated quiet study areas of the University Library (The Hive) if accompanied by an adult or where explicit permission has been granted by the Hive Library Services Manager (for instance to a group).
- d. The University has a separate [policy](#) relating to babies and children on campus and breastfeeding which provides further information on the University's position on bringing babies and young children on to the University's premises.

#### 11.5 [Children attending University arranged events](#)

11.5.1 For all formal activities arranged by the University, arrangements should comply with legal requirements for health and safety and should follow best practice of recognised bodies such as national sporting associations. Where the University or members of staff involved in these events have safeguarding concerns, the reporting procedures in this Policy should be followed.

11.5.2 In the case of children or vulnerable adults visiting University premises during University organised events, either for educational or other reasons, the guardians of those visitors should disclose to their University contact any specific medical requirements, including allergies and intolerances. Whilst the University will endeavour to ensure the safety of all visitors, the guardian retains responsibility for ensuring that safeguards are in place with regard to emergencies relating to such requirements. (For example, disclosing beforehand that a child suffers with Type 1 diabetes and ensuring that a responsible party carries insulin and glucose and is aware of the specific needs of the child.)

#### 11.6 [Children attending events not arranged by the University](#)

11.6.1 Where children attend University premises for a planned event organised by external bodies, those responsible for organising or managing such occasions are required to complete a [risk assessment and are required to have their own safeguarding policies and procedures in place](#). This risk assessment should consider the specific risks associated with the activity by reference to the child's age and level of maturity. Should any risks identified through the procedure be considered not to be safely manageable, the University reserves the right to

refuse the application for an individual or group of children to visit or be accommodated on University premises.

- 11.6.2 Children will only be accommodated overnight in University Halls of Residence where they are members of a planned group. This is subject to approval in writing by the Accommodation and Conferencing Team] and compliance with the accommodation booking terms and conditions in relation to safeguarding provided to the group by the University at the time of booking.

#### 11.7 Children participating in Work Experience/Employment on University Premises

- 11.7.1 Prior to undertaking work experience on University premises, the University member of staff (the person primarily responsible for arranging or organising the work experience, placement, etc.) responsible for children will:

- a. ensure that a specific risk assessment is carried out, and
- b. determine whether it is appropriate that the proposed supervisor undergoes an appropriate Disclosure and Barring Service check (and/or other relevant legal requirements) and ensure that these are carried out. Advice is available from the HR Team.

- 11.7.2 In the event that a member of staff is under the age of 18 years, the same process as outlined in Section 11.7.1 should apply, with reference to current employment regulations for the employment of children. HR will advise the line manager if the member of staff is under the age of 18 years and provide advice as required.

#### 11.8 Placements

- 11.8.1 For programmes which include placement activities, the University member of staff will ensure that placement providers are notified of any students who are children.
- 11.8.2 Where field trips are undertaken as part of a programme of study, the University member of staff will consider the age of the students as part of the [risk assessment required to be undertaken](#) for the activity.

#### 11.9 Unplanned attendance by young children (those under 16) on University premises

- 11.9.1 The University does not normally expect staff and students to bring their children onto campus.
- 11.9.2 The University recognises that there may be occasions where a member of staff or a student has to bring their child onto campus for a short period of time. However, this should not be done on a regular basis, and children must be accompanied and under close and continuous supervision by their parent/guardian at all times. Examples of appropriate, occasional visits may include staff and students bringing their children onto campus for brief informal visits such as to show a new baby to colleagues, or as part of a scheduled event that is specifically designated as family friendly.
- 11.9.3 Students are not allowed to bring their children into lectures, seminars, work placements or any other teaching activities. The use of such facilities by children and/or dependents of staff and students should not be an alternative to proper childcare arrangements.
- 11.9.5 Please refer to the University's policy on [Babies and Children on Campus and Breastfeeding](#) for further information.

## 12. Relationships at Work

- 12.1 The University has a [Relationships at Work Policy](#) which outlines the expectations and requirements in relation to the disclosure of any actual, perceived or potential conflicts of interest that may occur as a result of relationships at or connected to the workplace . Staff are required to report any personal relationships with another member of staff or a pre-existing relationship with a student using the form provided in the Relationships at Work Policy.
- 12.2 Staff and students should be aware that it is a criminal offence under the [Sexual Offences Act 2003](#) to engage in sexual activity with a person under the age of 18, *even where the person is of the legal age of consent*, where the adult is in a position of trust in relation to the under 18 year old.
- 12.3 The University, as set out in the Relationships at Work Policy, **prohibits any sexual or intimate relationship between staff and students where the relationship was not pre-existing**. Please refer to the [University's Prevention of Sexual Misconduct and Sexual Harassment Policy](#), for further guidance. Any such relationships would be subject to disciplinary action in accordance with the University's Staff Disciplinary Procedure.

## 13. Sexual Misconduct and Harassment

- 13.1 The University promotes a culture in which any incidents of sexual misconduct and harassment will not be tolerated, to ensure the preservation of a safe study and work environment where all members of the University community feel respected.
- 13.2 The University has established a [Prevention of Sexual Misconduct and Sexual Harassment Policy](#) to cover this area which includes detailed processes and support tools for both staff and students. The University is committed to providing appropriate welfare support to any student or staff member who needs it as a result of experiencing, witnessing or being affected by any incident/s of sexual misconduct or harassment, and we strongly encourage individuals to seek support and guidance in the first instance through the [Sexual Misconduct Reporting Tool](#).

## 14. Abuse of staff/students

- 14.1 Staff and students should be protected from abuse, whether that be physical or verbal. The [Student Disciplinary procedure](#), the [Harassment and Bullying Policy](#), Dignity at Work and Study Policy and other staff disciplinary procedures cover events where such abuse is directed at staff and/or students by other members of the University.
- 14.2 Should staff or students receive abuse from members of the public, such matters should be reported to University Security in the first instance.
- 14.3 Students on placement who suffer abuse from their employer are advised to contact their Module Tutor or Course Leader in the first instance. Concerns can also be raised through the University's [reporting portal](#). If the abuse comes from a client, the employer should be the first point of contact although students are advised also to notify the Module Tutor/Course Leader.

## 15. Welfare Cases with Safeguarding Concerns

- 15.1 If there is a safeguarding concern arising out of a staff or student welfare case, within the scope of this Policy, these should be reported to the Safeguarding Leads via [safeguarding@worc.ac.uk](mailto:safeguarding@worc.ac.uk).

## 16. Role of the University Safeguarding Committee

- 16.1 The University Safeguarding Committee is responsible for:
- To oversee the development, implementation and monitoring of systems, processes and policies relating to safeguarding children and vulnerable adults.
  - To oversee the development, implementation and monitoring of systems, processes and policies relating to the Prevent Duty
  - To keep relevant policies and procedures up to date, taking account of changes in legislation, and reviewing and auditing practice as appropriate.
  - To review best practice in the higher education sector as a whole and guidance issues by Government and other agencies.
  - To ensure accessibility to and ownership of policies and procedures by all staff and students of the University.
  - To create a safe culture within the University by sharing learning about best practice and promoting awareness about safeguarding and protection issues.
  - To monitor and oversee matters relating to the safeguarding and protection of children and vulnerable adults.
  - To ensure that clear strategies are developed in respect of safeguarding, and that they are coordinated and implemented consistently across the University, in a way which anticipates and responds to external and internal developments and ensures that the University can be accountable for safeguarding and protecting children and vulnerable adults.
  - To ensure a clear organisation focus on risk management in relation to safeguarding matters.
  - To ensure appropriate and proportion action is taken in respect of identified risks or concerns and to ensure any learning is shared from matters arising.
  - To prepare an Annual Report to the University Executive Board on issues relating to safeguarding and changes in legislation.

<b>Date Policy Approved</b>	<i>26 January 2017</i>
<b>Approval Authority</b>	<i>UEB</i>
<b>Date of Commencement</b>	<i>26-01-2017</i>
<b>Amendment Dates</b>	<i>26-06-2020 Minor amendments 12-04-21 Amendments - 02-03-22 Minor amendments – 09-06-22 Amendments -08-09-22 Amendments – 19-10-22 Amendments- approved by UEB 15-11-22 Reviewed and amended – 22-09-23 Links updated 14-11-23 Reviewed and amended – approved by UEB – 13-08-25</i>

<b>Date for Next Review</b>	14/09/2027
<b>Related Policies, Procedures, Guidance, Forms or Templates</b>	<i>Admissions Policy</i> <i>Code of Practice: Freedom of Speech Disclosure &amp; Whistleblowing Policy</i> <i>Harassment and Bullying Policy</i> <i>Policy for the Recruitment of Staff with Criminal Records</i> <i>Policy on babies and children on Campus and breastfeeding</i> <i>Prevention of Sexual Misconduct and Sexual Harassment Policy</i> <i>Relationships at Work Policy</i> <i>Guidance on Lone Working</i> <i>Guidance on Responding to Allegations of Abuse/Neglect</i> <i>Student Disciplinary Procedures</i>  All policies listed can be accessed through the <a href="#">Policies and Procedures page</a> .
<b>Policies (or equivalent) Superseded by this Policy</b>	<i>Procedure for Children on University Premises Safeguarding Children Policy</i>