

## **SAFEGUARDING POLICY**

**(incorporating the procedure for the referral of wellbeing concerns, including disclosures related to abuse or the Prevent Duty)**

For the purposes of this policy, the meanings of words and phrases highlighted in **bold text** are explained in the Glossary at Appendix 1 of this policy.

### **Purpose and Context**

The University of Huddersfield is committed to ensuring the safety and wellbeing of **children** and **vulnerable people** with whom the University's work brings us into contact. The development of this policy has been informed both by this commitment and by current legal requirements.

This policy establishes the principles and parameters within which we will work to ensure the safety and wellbeing of all children and **vulnerable adults** who are staff or students, or who visit University premises or engage in activities organised by the University. It is also in this context that the University will seek to meet its obligations under the **prevent duty**; to ensure that individuals within the University community are safeguarded from being drawn into **terrorism**.

This policy also sets out the procedure to follow if a vulnerable person discloses an allegation of abuse to you, if you otherwise become aware of an allegation or suspicion of abuse, or if you identify concerns about an individual potentially being drawn into **extremism** which could lead to terrorist acts, or into terrorism based on information received or behaviour observed.

Vulnerable people should be able to disclose incidents of **abuse** in the knowledge that they will be taken seriously and treated in a sensitive and confidential manner by the University.

Details of who to contact with queries about the application of this policy or to make a referral are set out at Appendix 3 of this policy.

### **Scope**

This policy applies to all University staff, students, contractors and volunteers whether or not they have regular contact with children or vulnerable people. This policy applies in relation to University activities carried out on campus or otherwise organised by the University. The only exception to this is where the University is collaborating with another organisation (which may be in relation to research or professional placements) and explicitly working within that organisation's policy and procedures for safeguarding vulnerable groups. If you are unsure about whether an organisation that you are working with has an appropriate safeguarding policy, you should contact a Designated Safeguarding Officer.

It is recognised that some members of the University will have a duty to report abuse outside the scope of this policy and this policy should be read in conjunction with any professional guidelines or additional requirements laid down by a particular School or Service.

This policy should be read in conjunction with the policies and procedures listed at the back of this document.

## 1 Responsibilities

### Specific Responsibilities

- 1.1 The University's responsibility is to develop policies, procedures, guidance and training to support appropriate staff and students in safeguarding the vulnerable people with whom they engage. We also take reasonable steps to ensure that our contractors, volunteers and visitors understand and accept their responsibilities regarding vulnerable people on University premises or when engaged in University activities.
- 1.2 The senior post holder with overall responsibility for this policy is the University Secretary on behalf of the University Senior Management Team, who has appointed the Disability and Inclusion Manager and the Wellbeing Manager as Designated Safeguarding Officers under the supervision of the Director of Student Services, who has operational responsibility for this policy.
- 1.3 Deans and Directors are responsible for appointing individuals to act as points of contact between their School or Service and the Designated Safeguarding Officers and for ensuring that their details are published within their School or Service and on the Safeguarding webpages.
- 1.4 The Designated Safeguarding Officers are responsible for receiving and referring as appropriate reports of concerns made under this policy, both internally and externally. These duties include making referrals to one or more of the Social Services, the Kirklees Prevent Hub and the Disclosure and Barring Service, as appropriate. Where a referral relates to allegations made against a member of staff, student, volunteer, contractor or visitor, the Designated Safeguarding Officer will also report the referral internally to the appropriate person to investigate in accordance with the relevant disciplinary procedure. The Designated Safeguarding Officers are also responsible for preparing an annual report for the University Senior Management Team summarising external and internal safeguarding referrals made.
- 1.5 In accordance with the University's policies and procedures for the recruitment and selection of staff and students, the University will ensure that appropriate Disclosure and Barring Service checks are carried out in respect of staff, volunteers or students involved in **regulated activity** with children and/or working in a regulated activity with adults and that unsuitable persons will be prevented from attaining such positions.

### General Responsibilities

- 1.6 As part of its commitment to safeguarding vulnerable people, the University expects all its staff, students, volunteers and contractors to safeguard and promote the wellbeing of those that might have suffered or be vulnerable to suffering harm or abuse. As part of this commitment the University aims to promote good practice and assist staff, students, volunteers and contractors to make informed and confident responses in relation to safeguarding issues affecting vulnerable people. Set out below is a non-exhaustive list which, if followed, will help to ensure that this is the case:
  - Treat vulnerable people equally and with respect and dignity reflecting their age, background, experience and individual abilities and having regard to gender, ethnicity, disability, culture and religion.
  - Make activities enjoyable but promote mutual trust and respect and encourage the acceptance of responsibility by vulnerable people for their own behaviour.

- Work in an open environment, avoiding private or unobserved situations and avoid spending time alone with vulnerable people or groups.
- Maintain a professional approach ensuring the avoidance of inappropriate familiarity, touching and exchange of personal information. Do not smoke or consume alcohol in front of or whilst in a position of responsibility for vulnerable people.
- Where manual or physical support is required, parental/carer consent should be sought beforehand and the vulnerable person should be consulted throughout the giving of that support. Where this is not possible (for example emergency first aid) contact should be made openly and, preferably, in the presence of an adult witness.
- Keep accident /incident reports and details of any treatment administered in accordance with the University Health and Safety Policy.
- Don't:
  - do things of a personal nature for a vulnerable person which they can do for themselves
  - ignore allegations made by a vulnerable person – record them and take appropriate action
  - allow or engage in horseplay or sexually provocative games or inappropriate touching
  - induce fear or behave in an oppressive manner with a vulnerable person
  - abuse your position of trust by engaging in a non-professional form of relationship, sexual or otherwise, even if the vulnerable person is over the age of consent.
  - disclose to a vulnerable person your personal details such as your home phone number or address (if it is necessary to provide such details, the Designated Safeguarding Officer must be informed beforehand).
  - use or allow inappropriate language/behaviour (including suggestions of a sexual nature) to go unchallenged.

## **2 Training and Guidance**

- 2.1 This policy will be disseminated to all staff and students and will be drawn to the attention of contractors, volunteers and, where appropriate, visitors.
- 2.2 In addition the University will develop appropriate training programmes and guidance materials to support staff and students specifically engaged in activities with vulnerable groups and for Designated Safeguarding Officers and those persons listed in Appendix 3.
- 2.3 All staff and volunteers must undertake Prevent Duty training appropriate to their role, as directed by their line manager.

### **3 Planned activities involving children or vulnerable adults**

If you are planning a University activity or event involving children or vulnerable adults you must ensure that appropriate and proportionate risk assessment and management procedures are followed in accordance with the University Health and Safety Policy.

### **4 Identifying and Reporting concerns**

4.1 The majority of the University's staff, students, contractors and volunteers are not trained or qualified in issues relating to children or vulnerable adults and it is not the responsibility of any member of the University to decide whether or not abuse has taken place or to take further action outside the scope of this policy. It is however the responsibility of staff, students, contractors, volunteers and visitors to the University to report any concerns they may have to the Designated Safeguarding Officers.

4.2 For the reasons stated above, it is important that the University responds consistently and effectively to ensure that disclosures or allegations of abuse or concerns that a member of the University community may be vulnerable to radicalisation or being drawn into terrorism are passed without unnecessary delay to trained professionals external to the University who are qualified to assess and manage such situations. To ensure that this is the case, the procedure set out in this section 4 must be followed in each such instance.

4.3 The following list provides examples of incidents that must always be reported:

- A vulnerable person reports an allegation of abuse regarding a member of their family or someone involved in their home, school or social life
- A vulnerable person reports an allegation of abuse regarding a member of either the University or an external organisation using the University's facilities
- A vulnerable person reports that they have had an accident or they have an accident whilst under your supervision
- You accidentally hurt a vulnerable person
- A vulnerable person appears to be sexually aroused by your actions or you are concerned that they are becoming attracted to you
- Concerns that a relationship is developing that could represent an abuse of trust
- Concerns that a colleague is becoming attracted to a vulnerable person
- A child or vulnerable adult seriously misunderstands or misinterprets your actions
- Concerns that an individual is potentially being radicalised or drawn into violent extremism or terrorism based on information received or behaviour observed.

4.4 If your involvement begins by a vulnerable person making a disclosure of abuse, then it is helpful for you to obtain relevant details from that person, if you feel comfortable doing so. If you do not feel comfortable taking details yourself, then contact the Designated Safeguarding Officers.

- 4.5 When taking details from a vulnerable person, ideally this should take place in an open space, in the presence of another person, but having regard to the sensitive nature of the allegation and to the guidance in paragraph 4.6 below and using form SP1 referred to at paragraph 4.7 below. Disclosure may not always occur in the circumstances or surroundings described above. In such cases the wishes and feelings of the vulnerable person should be ascertained as far as is reasonable and given due consideration before attempting to change surroundings or personnel. Give consideration to whether anyone else should be present (for instance where your gender is different from that of the vulnerable person).
- 4.6 When taking details from a vulnerable person about their concerns you should:
- Listen carefully and stay calm
  - Clarify points raised using open questions (such as “who”, “what”, “when”, “where”) and do not put words into the person’s mouth
  - Tell the person that they are right to share what has happened
  - Not interrupt the person when they are recalling significant events.
  - Make a detailed note of the date, time and place that the conversation took place, what the vulnerable person said and did and the questions asked of the vulnerable person. It is best practice to take verbatim notes if possible to avoid later confusion.
  - Reassure the vulnerable person and explain as soon as possible that the information may need to be shared. Promises of confidentiality must not be given but you should explain that the information will only be passed to those who need to know.
- 4.7 If you receive a disclosure of an allegation of abuse from a vulnerable person; or you have concerns that abuse is taking (or has taken place), you should record the details on form SP1 (attached at Appendix 2) and take the form immediately (within 1 hour of the disclosure of abuse) to a Designated Safeguarding Officer or in their absence to one of the people listed in Appendix 3. Do not discuss the matter with anyone who does not strictly need to know unless instructed to do so by a Designated Safeguarding Officer.
- 4.8 If you receive a disclosure of a concern that a vulnerable person may be at risk of being radicalised or drawn into violent extremism or terrorism you should record the details on form SP1 (attached at Appendix 2) and email the form to [prevent@hud.ac.uk](mailto:prevent@hud.ac.uk) or take the form to a Designated Safeguarding Officer or in their absence to one of the people listed in Appendix 3. Do not discuss the matter with anyone who does not strictly need to know unless instructed to do so by a Designated Safeguarding Officer.
- 4.9 If the concern arises out of hours, you should contact the Kirklees Emergency Duty Service on 01484 414933 and ensure the concern is reported to a Designated Safeguarding Officer by 9.30am the next working day.
- 4.10 Where there is an immediate threat to life or risk of harm to an individual or need for medical treatment, call the police and/or ambulance as appropriate and advise the attending officers/paramedics of your concerns. Then contact the Designated Safeguarding Officers.

4.11 It is not the responsibility of the University or any of its staff, students, contractors or volunteers to contact the parents or carers of the vulnerable person concerned. Enquiries from parents and carers should be directed to the Designated Safeguarding Officers who will, unless otherwise instructed by the relevant authorities, refer these on to Social Services for a response.

## **5 Abuse of the Safeguarding Policy and Referral Procedure**

It is a serious offence to make a malicious referral with an intention to mislead. A person found guilty of this may be subject to defamation and damages claims and be subject to University disciplinary procedures. Criminal sanctions, which include offences relating wasting police time, perverting or attempting to pervert the course of justice, conspiracy and perjury, could also apply.

## **6 Monitoring and Review**

The Designated Safeguarding Officers will record incidents relating to safeguarding concerns and will report them to the Director of Student Services, who will be responsible for updating the University Senior Management Team (in an anonymised form) on an annual basis. This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.

## APPENDIX 1 – GLOSSARY

In this policy the following words and phrases have the following meanings:

**Abuse in relation to children** The following definitions are reproduced from the government publication "Working Together to Safeguard Children" (2015)

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

**Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **abuse – in relation to vulnerable adults**

The following descriptions of abuse are reproduced from guidance issued by the Social Care Institute for Excellence (2015)<sup>1</sup>, which also sets out guidance on the types of indicators of abuse and types of behaviour that might mean that somebody is being abused.

**Physical abuse** includes assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair)

**Domestic violence or abuse** can be psychological, physical, sexual, financial and/or emotional and includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, and regulating everyday behaviour.

**Sexual abuse** includes rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the

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<sup>1</sup> <https://www.scie.org.uk/publications/atagance/69-adults-safeguarding-types-and-indicators-of-abuse.asp>



person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure

**Psychological or emotional abuse** includes enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying

**Financial or material abuse** includes theft of money or possessions, fraud or scamming, preventing a person from accessing their own money, benefits or assets, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money, denying assistance to manage/monitor financial affairs or to access benefits, misuse of benefits, false representation or exploitation of assets, misuse of legal authority, rogue trading

**Modern slavery** includes human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to

**Discriminatory abuse** includes unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation and other forms of harassment, slurs or similar treatment, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic

**Organisational or institutional abuse** includes neglect and poor care practice within an institution or care setting, such as a hospital or care home. This may range from isolated incidents to continuing ill-treatment.

**Neglect and acts of omission** includes failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity

<b>children</b>	anyone who has not reached the age of 18.
<b>extremism</b>	the statutory Prevent Duty Guidance <sup>1</sup> defines “extremism” as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs and calls for the death of members of our armed forces, whether in this country or overseas”. Where the term “extremism” is used in this policy, it should be read and understood in the context of this definition.
<b>prevent duty</b>	under the Counter-Terrorism and Security Act 2015, the University is under a duty to have due regard to the need to prevent people from being drawn into terrorism. This is known as the ‘prevent duty’. The Government has published <a href="#">statutory prevent duty guidance for Higher Education Institutions</a> setting out how the duty should be observed.
<b>regulated activity</b>	<p>for children, regulated activity refers to an activity of a specified nature that involves regular or close contact with children. The Department for Education has published <a href="#">guidance about regulated activity with children</a>.</p> <p>for adults, regulated activity is defined as work providing health care, personal care or providing assistance with money for adults or work which involves making welfare decisions on behalf of adults. The Department of Health has published <a href="#">guidance about regulated activity with adults</a>.</p>
<b>terrorism</b>	for the purposes of this policy, the statutory definition of “terrorism” should be applied where that term is used. That definition is taken from the Terrorism Act 2000, which defines terrorism as “the use or threat of action which involves serious damage to property; or endangers a person’s life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.”
<b>vulnerable adult</b>	a person who is over 18 years of age who needs community care services because of mental or other disability, age or illness and who is, or may be, unable to take care of themselves against significant harm or exploitation or abuse.
<b>vulnerable groups, vulnerable person and vulnerable people</b>	terms referring individually and collectively to children and vulnerable adults and/or individuals vulnerable to being drawn into terrorism, according to context.

## APPENDIX 2 – REFERRAL FORM

### SAFEGUARDING REPORTING FORM

Name of: .....

Vulnerable person

School or Address .....

.....

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Course Information (if relevant): .....

Name of Person

Reporting Allegation/

Suspicion/Concern (if not the

person named above).....

Names of anyone else

present when allegation

made or concern raised

.....

Details of allegation/suspicion/concern

(include

- date and time of incident and complaint

- persons involved and witnesses

- what was said and done (including any visible injuries)

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Is this on-going?: YES/NO

If no, where there is an alleged perpetrator, does that person continue to have access to the vulnerable person?: YES/NO

Name of person making  
this report: .....

Contact Details: .....  
.....  
.....

**NOW TAKE THIS FORM TO A DESIGNATED SAFEGUARDING OFFICER OR IF THERE IS A CONCERN THAT AN INDIVIDUAL IS AT RISK OF BEING RADICALISED OR DRAWN INTO TERRORISM YOU CAN EMAIL THE FORM TO [prevent@hud.ac.uk](mailto:prevent@hud.ac.uk)**

## APPENDIX 3 – CONTACT INFORMATION FOR DESIGNATED SAFEGUARDING OFFICERS AND OUT OF HOURS REFERRALS

<p><b>Once an allegation/concern has been made and reported on Form SP1 (Appendix 2), the completed form should be taken immediately to the Designated Safeguarding Officer.</b></p>	
Designated Safeguarding Officers	<p>Disability Inclusion Manager: Gary McGladdery x1831</p> <p>Wellbeing Manager: Emma Carpenter x1120</p> <p>x1001 (Student Services)</p>
<p><b>In the absence of a Designated Safeguarding Officer, please contact the appropriate member of staff as outlined below.</b></p>	
Matters concerning staff should be reported to the Director of Human Resources.	Siobhan Campbell x2471
Matters concerning students should be reported to the Director of Student Services.	Matt Mills x3270
Matters concerning external affairs should be reported to Deputy Head of Schools and Colleges Liaison Service	Amanda Kenningley x1654
If this is not possible the matter should be reported to the Head of Schools and Colleges Liaison Service.	Julie Pink x2993
Out of hours contact number	<p><b>Kirklees Emergency Duty Service</b> 01484 414933</p>

<b>POLICY SIGN-OFF AND OWNERSHIP DETAILS</b>	
<b>Document name:</b>	Safeguarding Policy
<b>Version Number:</b>	V1.2
<b>Equality Impact Assessment:</b>	To follow
<b>Approved by:</b>	SMT
<b>Date Approved:</b>	26 April 2018
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<b>Author:</b>	University Solicitor
<b>Owner (if different from above):</b>	University Secretary
<b>Document Location:</b>	<a href="https://www.hud.ac.uk/media/policydocuments/Safeguarding-Policy.pdf">https://www.hud.ac.uk/media/policydocuments/Safeguarding-Policy.pdf</a>
<b>Compliance Checks:</b>	Audits. Monitoring and review: Director of Student Services to report annually to SMT identifying any concerns of patterns of abuse. Training also monitored.
<b>Related Policies/Procedures:</b>	Safeguarding Referral Procedure for Designated Safeguarding Officers <a href="#">Whistleblowing Policy</a> <a href="#">Policy for admission of Under 18s</a> <a href="#">Student Mental Health Policy</a> <a href="#">Staff Grievance Procedure</a> <a href="#">Dignity at Work Policy</a> <a href="#">Student Handbook of Regulations [ref. Code of Conduct, Disciplinary and Complaints]</a> Health and Safety Policy [ref: <a href="#">accident reporting policy</a> and section on <a href="#">Children on University premises</a> ] <a href="#">Computing Regulations</a> <a href="#">Policy statement on staff recruitment and student admissions where applicants are ex-offenders</a>

<b>REVISION HISTORY</b>			
<b>Version</b>	<b>Date</b>	<b>Revision description/Summary of changes</b>	<b>Author</b>
V1.2	15 October 2018	Minor amend to change the policy title to include reference to the Prevent Duty	University Secretary
V1.1	19 July 2018	Minor amends to reflect job title changes and compliance checks	University Solicitor

V1.0	26 April 2018	First version of new policy. This new policy updates and revises previous Safeguarding of Vulnerable Groups Policy and Prevent Policy, both of which are replaced by this policy.	University Solicitor
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