University of South Wales
UK Student Recruitment Team
and
Recruitment Events Team

Safeguarding Policy & Procedures

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UK Student Recruitment Team and Recruitment Events Team Safeguarding Policy & Procedures

Contents

1 Introduction

1.1   For full and detailed information regarding any element of the UK Student Recruitment Team and Recruitment Events Team Safeguarding Policy, please refer to the University of South Wales's Safeguarding Policy. The UK Student Recruitment and Recruitment Events Teams want to ensure that they meets its responsibility to safeguard and protect the children and vulnerable adults they work with and to ensure that the highest possible standards in terms of safeguarding are maintained. It is, therefore, appropriate that both teams have a clear policy and procedures in place to refer to when there is concern for a child's or vulnerable adult's welfare or the conduct of a member of staff. This policy is based on and is underpinned by the University of South Wales's Safeguarding Policy.

1.2   For detailed information on the legislation which regulates this policy, please refer to the [University of South Wales's Safeguarding Policy.](#)

2 Policy Issues

2.1 What is Safeguarding?

2.1.1 The University of South Wales is committed to upholding the safety and welfare of children and vulnerable adults. The key principles that underpin this policy stem from the Human Rights Act 1998, the Children Act 2004, the All Wales Child Protection Procedures 2008 and the Social Services and Wellbeing (Wales) Act 2014.   Whilst there is no statutory definition of safeguarding, `Safeguarding children: working together under the Children Act` 2004 sets out that safeguarding and promoting the welfare of children is concerned with:
- protecting children from abuse and neglect
- preventing impairment of their health or development
- ensuring that they receive safe and effective care

2.1.2 Abuse is a violation of an individual's human and civil rights by any other person or persons.

2.2 Who are we seeking to safeguard?

2.2.1 Safeguarding applies to 'children' and 'vulnerable adults' (sometimes referred to as 'adults at risk')

2.2.2 The Children Act 1989 defines a 'child' as a person under the age of 18.

2.2.3 In respect of safeguarding vulnerable adults, section 126 of the Social Services and Wellbeing (Wales) Act 2014, defines an adult at risk as being anyone 18 years of age or older who is:
- experiencing or is at risk of abuse or neglect;

• has needs for care and support whether or not the local authority is meeting these; and as a result of these needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

2.4 Policy Statement

2.4.1 The University and therefore the University's UK Student Recruitment and Recruitment Events Teams are committed to providing a safe and secure environment for all students, staff and individual visitors who access its facilities and services.

2.4.2 The aim of the UK Student Recruitment Team and Recruitment Events Team's Safeguarding Policy is to provide children and young people with appropriate safety and protection whilst attending on-campus events and whilst members of the Team are visiting schools and colleges where children and vulnerable adults are present.

2.4.3 The University recognises its particular responsibility to safeguard the wellbeing of children, and vulnerable adults engaged in the breadth of the University's activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported current or historic abuse.

2.4.4 The UK Student Recruitment and Recruitment Events Team at the University of South Wales seeks to ensure that its Safeguarding policy and procedures comply with statutory duties and reflect available guidance on good practice in safeguarding and that safeguarding arrangements are proportionate to the risks involved.

2.4.5 UK Student Recruitment Team and Recruitment Events Team place paramount importance on protecting the safety and well-being of the children participating in their activities. The UK Student Recruitment and Recruitment Events Teams are committed to practices which protect children from harm, and will ensure the safety and protection of children involved in projects and events on campus by adhering to the University of South Wales's Safeguarding Policy and the UK Student Recruitment and Recruitment Events Team Safeguarding Policy and the procedures outlined in both documents.

2.4.6 As a provider of activities for children and vulnerable adults, the UK Student Recruitment and Recruitment Events Team recognise that all staff have a responsibility to:
- Protect the health, safety and well-being of children and vulnerable adults
- Be aware of issues which could cause harm to children, including those relating to health and safety and child abuse
- Be alert to any signs of child abuse
- Treat seriously and report all cases of suspected child abuse.

2.4.8 This policy will be reviewed on a regular basis in accordance with the appropriate legislation.

3 Safeguarding Structure

3.1 The University has an organisational structure for safeguarding. For the UK Student Recruitment and Recruitment Events Teams, one **Designated Safeguarding Officer (DSO)** has been appointed to take overall responsibility for safeguarding within the Team's remits. The DSO for the UK Student Recruitment and Recruitment Events Teams is Sera Evans, Head of UK Student Recruitment. There are two **Deputy Designated Safeguarding Officers (DDSO)** which support the DSO, namely Louise David, Student Recruitment and Outreach Manager and Katy Thomas, Senior Recruitment Events Officer.

The responsibilities of all Safeguarding Officers can be found at Appendix 3.

4 Signs of Harm or Abuse

4.1 Staff and students working in direct contact with children or vulnerable adults may come across signs of harm and/or abuse. Staff need to ensure that any concerns for the wellbeing of a child, or vulnerable adult are reported to DSO or DDSO as quickly as possible and, at most, within 24 hours.

4.2 The DSO, or DDSO as above will invoke the appropriate procedures to ensure that children and adults are safeguarded involving Social Services and the Police as appropriate. Where staff members are unsure and need guidance about safeguarding issues, they must seek support from the DSO or DDSO.

4.3 Where an allegation of abuse or inappropriate behaviour is made against a member of staff and relates to their actions as an employee of the University, Human Resources will advise and guide the line manager of the member of staff against whom allegations have been made in relation to employment and disciplinary issues. A referral should be made to Children's Services if the allegation involves actual or possible harm to a child, or to Adult Social Services if the allegation involves actual or possible harm to a vulnerable adult.

4.4 Where an allegation of abuse or inappropriate behaviour is made against a student and relates to their actions as a member of the University, the Head of Student Casework will provide advice in relation to student discipline or casework issues.

5 Control Measures and Procedures

5.1 This policy document constitutes the general policy that applies to all areas of activity undertaken by the UK Student Recruitment and Recruitment Events Team. This Policy is underpinned by the University's Safeguarding Policy, and this policy will be reviewed on a regular basis.

5.2 The University's Safeguarding Steering Group will review the University's Safeguarding policy annually. The University will develop new policies where necessary in line with

changes in legislation and best practice guidance and the UK Student Recruitment and Recruitment Events Teams will also revise this Policy accordingly.

5.3 All members of the Student Recruitment and Recruitment Events Team have undertaken Level 2 training (December 2019) and the DDSOs and DSO have also undertaken Level 3 training (January 2020). Level 2 and Level 3 training will be refreshed every 3 years.

5.3 Students
The University takes a risk management approach to safeguarding in organising learning and teaching and delivery of services to students and the public. Faculties and Departments are required to carry out risk assessments in respect of activities that involve children or adults at risk, and make reasonable, proportionate adaptations to those activities.

Where adaptations are reasonable and proportionate, the University will put in place measures in order to control risks and ensure safeguarding and wellbeing.

The University reserves the right to refuse to admit a child or adult at risk to a University - managed activity, if it judges that the adaptations necessary to safeguard that individual's well-being go beyond what is reasonable and proportionate.

5.4 Staff
All employees, contractors and volunteers are advised to minimise physical contact with students, except for reasons of health and safety.

All employees, contractors and volunteers are reminded of the offence of abuse of positions of trust under sections 16 to 19 of the Sexual Offences Act 2003. This makes it an offence for a person aged 18 or over intentionally to behave in certain sexual ways in relation to a child aged under 18, where the person aged 18 or over is in a position of trust (defined as looking after a child aged under 18 who is receiving education at an educational institution). A person "looks after" a child in this context if he/she is regularly involved in caring for, training, supervising or is in sole charge of a child or children.

The UK Student Recruitment Team obtains enhanced DBS disclosures for all its members. The Recruitment Events Team do not require DBS disclosures due to the limited nature of direct contact they have with children and vulnerable adults. The University has procedures to evaluate information about an individual's criminal record, and make sensible, fair and consistent judgements about whether the individual is safe to engage (or remain engaged) in the employment, role or office.

5.5 Other groups
Where children of students, staff members or visitors are present on the University estate or premises used by the University, they remain the responsibility of their parent/guardian or teachers, unless they are enrolled as students, or are otherwise involved in a University-managed activity.

When school and college groups visit USW campus for activities in Faculties, they will be accompanied by teaching staff from their organisations who will act in loco parentis. Teaching staff will be advised before visiting that the young people will remain in their care for the duration of the visit.

Safeguarding the well-being of children visiting the University estate or premises used by the University (without their parent/guardian) is the responsibility of the organiser of the activities in which the child is participating.

Safeguarding the well-being of service users of the University is the responsibility of the organiser of the service they are accessing within the overall remit of this policy.

6 Procedures to be invoked when harm is suspected

6.1.1 Details of the exact procedures to be invoked when harm/abuse is suspected can be found in the Code of Conduct, Guidance and Procedures in Appendix 1.

Recognition, Reporting Mechanisms and Procedures

6.1.2   Guidance on how to recognise abuse and neglect of children and vulnerable adults, along with reporting mechanisms, can be found in Appendix 1 of the University of South Wales's Safeguarding Policy, and they are also outlined in the UK Student Recruitment and Recruitment Events Team Staff Code of Conduct, Guidance and Procedures (Appendix 1).

6.1.3   It is the responsibility of members of the UK Student Recruitment and Recruitment Events Team and all staff/students/contractors employed by both teams to share concerns in order to safeguard the welfare of vulnerable groups, as outlined in the UK Student Recruitment Team and Recruitment Events Team Staff Code of Conduct, Guidance and Procedures (see Appendix 1 of this policy).

6.1.4   Any concerns should be reported to the **Deputy Designated Safeguarding Officer (DDSO)** (or **Designated Safeguarding Officers (DSO)** in the absence of the DDSO). The **DSO or DDSO** will report concerns in accordance with Appendix 1 of the University of South Wales's Safeguarding Policy (as outlined in Appendix 1).

6.1.5   For contact details of the DSO and the DDSOs within the UK Student Recruitment and Recruitment Events Teams, please see Appendix 2 of this policy. All staff/ students/ contractors, including Student Ambassadors employed by the UK Student Recruitment and Recruitment Events Teams should ensure that they are aware of the DDSOs and the DSO before undertaking any work for either team. Safeguarding awareness training is part of the Student Ambassador induction process.

6.1.6   It is unlikely that during an individual school/ college-based workshop or recruitment event, a child or vulnerable adult will have the opportunity to develop a relationship with a member of staff that would lead to them confiding in said member of staff. However, staff must still be aware of the issues surrounding child protection and the protection of vulnerable adults in this context.

6.2.1 Safeguarding Measures

On-campus activities for schools and colleges
- All groups visiting campus should be accompanied by a teacher who will act in loco parentis.
- Before school/ college groups attend any events on campus, the school/ college must ensure that each and every pupil has obtained consent from their parents/ guardians prior to the event.
- Before school/ college groups attend residential events on campus, the school/ college must ensure that each and every pupil has completed a medical form prior to the event.
- Teachers should ensure that all pupils' consent forms and medical forms are accessible when pupils are on campus, in case a situation arises whereby the consent/ medical form is required.
- University staff must be notified of any pupils whose parents/ guardians DO NOT consent to their child being photographed whilst on campus.
- University staff must be notified of any pupils who may have specific medical or dietary requirements during their visit to campus.
- All teachers and accompanying staff are made aware of the above regulations prior to every event.
- The Student Recruitment Officer or Senior Student Recruitment Officer responsible for the event or activity should ensure that the accompanying teacher has a record of all students in attendance.
- If a disclosure is made to member of the Student Recruitment Team as part of a pre-arranged school/ college visit, this will be passed to the teacher acting in loco parentis and the schools' safeguarding procedures will also be implemented.

Off-campus visits to schools/colleges/community groups
- Student Recruitment Officers and Senior Student Recruitment Officers will follow safeguarding procedures as outlined by individual schools, colleges and community groups.
- Any disclosures and subsequent actions will be reported to the DSO and recorded as per procedure outlined.

7 Use, Retention & Disposal of Disclosures and Disclosure Information from Disclosure and Barring Service (DBS)

7.1 All members of the UK Student Recruitment Team require DBS disclosures. In addition to gaining DBS disclosures, all staff should be provided with a copy of the UK Student

Recruitment and Recruitment Events Team Code of Conduct, Guidance and Procedures (see Appendix 1). The Recruitment Events Team do not require DBS disclosures due to the limited nature of direct contact they have with children and vulnerable adults.

7.2 Due to the large number of staff employed by the UK Student Recruitment Team on a part-time, short-term, or ad-hoc basis, it will not always be practical to receive DBS disclosures for all staff/students/contractors e.g. a tutor who will be taking a single session at short notice, or individual student ambassadors. In this case, it is sufficient for that member of staff to be made aware of the Code of Conduct and agree to adhere to it. Safeguarding awareness training is part of the Student Ambassador induction process.

7.3 Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to the DSO and the DDSOs within the team.

7.4 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. Disclosure may be made to a regulatory body under a statutory requirement. In these circumstances, individuals will be informed prior to disclosure. In accordance with section 124 of the Police Act 1997, disclosure information will only be passed to those who are authorised to receive it in the course of their duties. The DSO will maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a **criminal offence** to pass this information to anyone who is not entitled to receive it. The UK Student Recruitment Team staff will seek advice from their line management or from HR when making recruitment decisions with regard to DBS checks that give cause for concern (as outlined in 6.2.6 above).

7.5 DBS disclosures which have been processed outside of UK Student Recruitment Team and the University of South Wales (e.g. from previous employment) will **not** be accepted.

8 Data Storage

8.1 The UK Student Recruitment and Recruitment Events Teams will not store personal data, which includes information on and visual images of children for any longer than is necessary, specifically;

- Evaluation forms will be stored until analysis is complete.

- Risk Assessments will be stored for 5 years after they are superseded/ updated.

- Parental permission forms, Code of Conduct forms and special requirement forms will be disposed of securely after each event.

- DBS disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to the DSO and the DDSO.

Appendix One

**UK Student Recruitment and Recruitment Events Team
Staff Code of Conduct, Guidance and Procedures**

The UK Student Recruitment and Recruitment Events Team wish to ensure that everyone who takes part in its activities understands their responsibilities to safeguard and promote the welfare of children and young people.

1. GENERAL PRINCIPLES
These guidelines reflect the principles that:
- Well-being is paramount.
- Everyone should be treated with respect and dignity.
- Employees should understand their responsibilities to safeguard and promote well-being
- All members of the University should demonstrate exemplary behaviour when working with children, and vulnerable adults in order to protect them from abuse and to protect themselves from false allegations.
- Employees should discuss and/or take advice promptly from a DSO/DDSO about any incident or behaviour that may give rise to concern.
- Any allegations or suspicions of abuse should be reported immediately to the DSO/DDSO and to the relevant Local Authority Department.
- Employees should be aware that breaches of the law and other professional guidelines could result in disciplinary or criminal action being taken against them.
- Employees should know the procedures for handling allegations against staff and to whom they should report concerns.

2. WORKING WITH CHILDREN AND YOUNG PEOPLE
The Children Act 1989 defines a 'child' as a person under the age of 18.

2.1 WHAT IS ABUSE?
Abuse is a violation of an individual's human and civil rights by any other person or persons.

2.1.1 Abuse of children and young people
It is recognised that some members of the University will have little contact with vulnerable groups at work and consequently may not be in a position to recognise abuse. Abuse can and does occur both within families and in institutional or community settings. The University acknowledges that some individuals seek to use voluntary and community organisations to gain access to vulnerable people, and that it is necessary to have an open mind when the possibility arises that a member of the University is suspected of abuse or inappropriate activity. Abuse is defined by the All Wales Child Protection Procedures 2008 as one of the following:

1. **Physical**: "Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing harm to a child. Physical harm may also be caused when a parent or caregiver fabricates or induces illness in a child who they are looking after."

2. **Emotional**: "Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, for example by witnessing domestic violence abuse within the home or being bullied or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone."

3. **Sexual:** "Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact activities, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways."

4. **Neglect:** "Neglect is the persistent failure to meet a child's basic or physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In addition, neglect may occur during pregnancy as a result of maternal substance misuse"

5. **Domestic Violence:** In addition, the Domestic Violence, Crime and Victims Act 2004 closed a loophole for murder/manslaughter and the 2012 Amendment includes "causing child or vulnerable adult to suffer physical harm"

6. **Grooming:** Under the Sexual Offences Act 2003, grooming of young people under the age of 18 became a statutory offence.

7. **Online Abuse:** Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children, young people and vulnerable adults may experience cyber bullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children and vulnerable adults can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children and vulnerable adults can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night,

the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

8. Other areas to consider specifically for the student population are:

- Radicalisation and Extremism
- Human Trafficking
- Female Genital Mutilation
- Honour Based Violence
- Forced Marriage.

2.2 Working safely with children
You should:
- Maintain (or know the whereabouts of) a register of children working with you at any given time.

- Work in an open environment avoiding private or unobserved situations and encouraging open communication. Avoid spending time alone with children away from others. Teaching spaces for one-to-one tuition should incorporate a proportionate degree of external visibility.

- Any staff working with children, or adults at risk in a clinical or therapeutic setting, sometimes alone, should be appropriately supervised and have undergone DBS checks.

- Treat all children equally, with respect and dignity.

- Treat the child's welfare as paramount.

- Maintain a safe and appropriate distance with children. It is illegal for staff, students or volunteers to have an intimate relationship with a child.

- Ensure that if any form of manual/physical contact is required, it should be provided where you can be observed and clearly seen by others. In sporting situations this should be according to guidelines provided by the appropriate National Governing Body.

- Involve parents/carers/teachers wherever possible, e.g. by encouraging them to take responsibility for the children in their care in changing rooms, clinics etc.

- Be an excellent role model.

- When feedback is necessary give enthusiastic and constructive feedback rather than negative criticism.

- Keep a written record of any injury that occurs, along with the details of any treatment given.

- Attend relevant safeguarding training courses that the University provides.

- Be committed to cooperate in any investigations.

You should never:

- Engage in rough physical games, or those that could be considered as sexually provocative.

- Share sleeping accommodation overnight with a child.

- Go into a child's room unless absolutely necessary. (If it is necessary, two members of staff should enter.)

- Use a mobile phone or camera when working except in an emergency or as part of an appropriate learning activity where a formal risk assessment has been undertaken.

- Allow or engage in any form of inappropriate touching.

- Allow children or colleagues to use inappropriate language unchallenged.

- Make comments to a child, even in fun, that could be construed as sexually provocative.

- Deliberately reduce a child to tears as a form of control, belittle or demean a child or use emotional abuse.

- Allow allegations made by a child to go unrecorded or not acted upon.

- Invite or allow children, to visit or stay with you at your home.

- Do things of a personal nature for children that they can do for themselves. It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents/carer or teacher and, where possible, the child. Toileting must be undertaken by two people, one of whom must be female when accompanying a female child, young person or vulnerable adult (where assistance is needed). There is a need to be responsive to a child's reactions, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

- Some research activities involving children may necessitate physical contact. It is important for adults to understand what is appropriate within such activities, to avoid anything that could be misunderstood, and for such activities to be supervised.

- Physical contact between a member of staff and student is sometimes necessary for the student's learning. Its purpose and form should be explained to the student by the member of staff and the student's consent obtained in advance of physical contact taking place. In this context, as in all others, a member of staff should be sensitive to feedback from the student and respond accordingly.

- Have a child, young person or vulnerable adult on one's own in a vehicle.

- Spend time alone with a child. If you are in a situation where you are alone with a child, make sure that you can be clearly observed or seen by others. In a therapeutic, clinical environment relevant ethical and professional guidelines should be adhered to.

3. WORKING WITH ADULTS

In respect of safeguarding vulnerable adults, section 126 of the Social Services and Wellbeing (Wales) Act 2014, defines an adult at risk as being anyone 18 years of age or older who:

> • is experiencing or is at risk of abuse or neglect;
> • has needs for care and support whether or not the local authority is meeting these; and as a result of these needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

There are situations, such as in the provision of personal care to a disabled person, where it will be necessary to have a degree of physical contact in a one-to-one situation. The key principle is that the person should be treated with respect and dignity and that consent should be obtained to any action taken where appropriate (e.g. in relation to cases under the Mental Capacity Act).

3.1 WHAT IS ABUSE?

Abuse is a violation of an individual's human and civil rights by any other person or persons.

3.2 Abuse of adults

There are many ways in which an adult may be abused. It is not unusual for an abused adult to suffer more than one kind of abuse. Accordingly, the impact of abuse and its seriousness for the individual must be evaluated in every case.

In Safe Hands (Welsh Government 2000) identifies five main categories of abuse:

1. **Physical:** including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions;

2. **Sexual:** including rape and sexual assault or sexual acts to which the vulnerable adult has not given consent, or is incapable of giving informed consent or was pressured into consenting. This may involve contact or non-contact abuse (e.g. touch, masturbation, being photographed, teasing, inappropriate touching);

3. **Financial or material:** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;

4. **Emotional or Psychological:** abuse including emotional, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks; and

5. **Neglect or acts of omission:** including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding of the necessities of life, such as medication, adequate nutrition and heating.

6. Other areas to consider specifically for the student population are:

   - Radicalisation and Extremism
   - Human Trafficking
   - Female Genital Mutilation
   - Honour Based Violence
   - Forced Marriage.

4. WHAT TO DO IF ABUSE IS REPORTED OR SUSPECTED

The recognition of abuse is not always easy and the University acknowledges that its employees are not experienced in this area and will not easily know whether or not abuse is taking place. Indeed, it is not the place of University members 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 vulnerable groups. Any concerns should be reported promptly to a DDSO or DSO who will in turn report to the Lead and Principal Safeguarding Officers as appropriate. All staff should be made aware of whom the DSO or DDSO is in their relevant setting, before working with members of any vulnerable group. Every effort should be made to maintain confidentiality. Suspicions must not be discussed with anyone else on campus other than those nominated above. The LSO and PSO have the responsibility to act on behalf of the University in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation or suspicion and referring the matter to the appropriate statutory authorities. Where there are outreach activities, e.g. in a school or hospital, reported or suspected abuse should be referred to the Designated Safeguarding Officer of the school or hospital. The expectation of the University is that any such referral would be brought to the attention of the University Lead Safeguarding Officer by the school or hospital Designated Safeguarding Officer.

NB: It is the task of designated statutory bodies (Police, Social Services, NSPCC) not the University, to assess the information given to them and to decide whether to investigate the matter further under The All Wales Child Protection Procedures (2008) and the Wales Interim Policy and Procedures for the Protection of Vulnerable Adults (2013). It is important to note that in the case of adults, if the adult has the capacity to refuse consent to Social Services responding to the alleged abuse and there are no other vulnerable adults at risk; a crime has not been committed; and children are not present (or in the environment where the alleged abuse has taken place), Social Services cannot proceed without consent and therefore, the University would not be able to proceed.

Under no circumstances should members of the University carry out their own investigation into suspicions or allegations of abuse, neither should they question victims closely, as to do so may contaminate evidence and obstruct any investigation that may be carried out subsequently by the Police or Social Services.

5. RESPONDING TO SUSPICIONS OF ABUSE

If a vulnerable person says something or acts in such a way that abuse is suspected, the person receiving the information should:

- React in a calm but concerned way.

- Tell the person that s/he is right to share what has happened; and that s/he is not responsible for what has happened.

- Take what the person says seriously.

- Keep questions to an absolute minimum only to clarify what the person is saying; not to interrogate.

- Do not interrupt the person when they are recalling significant events.

- Reassure the person that the problem can be dealt with.

- Do not give assurances of confidentiality that cannot be kept but should reassure the person that the information will only be passed on to those people who need to know.

- Make a full record of what is said and done, though this should not result in a delay in reporting the problem to the relevant DSO or DDSO.

The record should include:

- The person's account of what has occurred.

- The nature of the allegation or concern.

- A description of any visible physical injury (clothing should not be removed to inspect the injury).

- A verbatim record of the disclosure. This may be used later in a criminal trial and it is vital that what is disclosed is recorded as accurately as possible. Do not ask leading questions. The record must be drafted in the person's words and should not include the assumptions or opinions of others.

- Any dates, times or places and any other potentially useful information.

The problem should be reported IMMEDIATELY by the DSO/DDSO to the LSO or PSO who will to take the appropriate action. If the concern is of a very serious nature and arises out of normal office hours (evenings and weekends), contact should be made directly with the relevant Social Services Emergency Duty Team. Details of these teams can be found online on the relevant Local Authority's website. It is recognised that staff may need support after receiving a disclosure and will be offered appropriate support by line management.

6. WHISTLEBLOWING

Whistleblowing is an important aspect of a safeguarded institution whereby staff, student mentors and volunteers are encouraged to share genuine concerns about a colleague's behaviour, in confidence, with the Principal Safeguarding Officer (HR). Working with children, or adults at risk places staff and volunteers in positions of power. In order to retain the trust of a child, or adult at risk, it is essential that all reasonable steps are taken to

ensure this power is exercised responsibly. There may be situations whereby staff or volunteers have genuine concerns about the conduct of a colleague towards a child or adult. All members of the University have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care and will receive appropriate support when doing so. In accordance with the Public Interest Disclosure Act 1988 and the All Wales Whistleblowing – Right to Raise Concerns 2012, and the USW Whistleblowing Policy, the University will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions. Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.

7. ALLEGATIONS OR SUSPICION OF ABUSE AGAINST A MEMBER OF THE UNIVERSITY

This can be an extremely difficult issue to deal with. It can be difficult to accept that a colleague may harm a child, or adult. It may also be that the behaviour that causes concern is bad practice rather than abuse. Any concerns should be reported to the DSO/DDSO in the first instance. 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 against a member of the University without the advice and agreement of the investigating agencies (e.g. the Police or Social Services), except where such action is necessary to protect a child, or adult. 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 member of the University 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 procedure.

8. CONCERNS OF POSSIBLE ABUSE OUTSIDE OF THE UNIVERSITY

As a result of their contact with a child, or adult, members of the University may become concerned that the person is being abused by someone unconnected with the University. In these circumstances the individual should report their concerns to the DSO/DDSO as outlined above.

9. ALLEGATIONS OF ABUSE BY AN INDIVIDUAL FROM AN EXTERNAL ORGANISATION USING UNIVERSITY FACILITIES

A child, or adult who is on campus through an external organisation may make an allegation of abuse to a member of the University about an adult member of that external organisation. In this situation, the member of the University must report the allegation to the DSO/DDSO. The DSO/DDSO will report the matter to the external organisation and will notify the Lead Safeguarding Officer of their action. The University expects the organisation to follow its own safeguarding policy and will require confirmation that the appropriate action has been taken. In addition, the Lead Safeguarding Officer will consider whether it is permissible to allow the external organisation continued use of the facilities during the investigation period and beyond.

Appendix Two
UK Student Recruitment and Recruitment Events Team DSO/ DDSO Contact Details

Designated Safeguarding Officer:
Sêra Evans
Head of UK Student Recruitment
Marketing and Student Recruitment
University of South Wales
Tel: 01443 654 408

Deputy Designated Safeguarding Officer:
Louise David
Student Recruitment and Outreach Manager
Marketing and Student Recruitment
University of South Wales
Tel: 01443 482 290

Deputy Designated Safeguarding Officer:
Katy Thomas
Senior Recruitment Events Officer
Marketing and Student Recruitment
University of South Wales
Tel: 01443 654 405

Appendix Three
Responsibilities of University Safeguarding Officers

Lead Safeguarding Officer (LSO)
- To be accountable to the University Executive Team and Governing Body for the institution's safeguarding policy and practice.
- Ensure there is a staff structure and committee structure in place to fulfil safeguarding responsibilities
- To develop University-wide procedures, practice and guidance for safeguarding that are compliant with Local Safeguarding Children's Board procedures.
- To Chair the University Safeguarding Steering Group.
- Ensure that safeguarding is afforded utmost priority at the most senior level within the institution.

- Undertake safeguarding training at an appropriate level.
- Ensure that funding and human resources including staff development and training are available to fulfil safeguarding responsibilities.
- Ensure procedures are in place for managing allegations, whistleblowing and safe recruitment practices.
- Ensure that secure records of Vulnerable Groups Protection concerns are stored and shared appropriately.
- To create links with the local authority children's services teams.
- To identify Principal Safeguarding Officers.
- Ensure that monitoring and review systems are in place to incorporate new guidance and legislation and to test out existing systems.
- To act as a source of support, advice and expertise to staff.

Principal Safeguarding Officers (PSO)
- Deputise for the LSO in the University senior management structure
- Receive referrals that have been escalated from DSO/DDSO level
- Liaise with the Lead Safeguarding Officer to inform him/her of any issues and on-going investigations
- Devise the means by which the policy is implemented, monitored and refined.
- Ensure each member of staff has access to and understands the USW Safeguarding Policy especially new or part time staff who may work with different educational establishments
- Refer cases of suspected abuse or allegations escalated from DSO/DDSO level to the relevant investigating agencies
- Report such referrals to the Lead Safeguarding Officer
- Keep detailed, accurate and secure written records of referrals/concerns
- Be trained to an appropriate level in Safeguarding and attend any relevant or refresher training courses at least every two years.
- Be trained in whistleblowing.
- Have a working knowledge of how Local Children's Safeguarding Boards operate, the conduct of a Child Protection case conference or strategy meeting and be able to attend and contribute to these effectively when required to do so

Designated Safeguarding Officer (DSO)
Deputy Designated Safeguarding Officer (DDSO)
- Receive incident or case information from staff or students.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies such as Social Services, Police.
- Report referrals to Lead Safeguarding Officer when they need to be escalated and keep the LSO aware of developments in cases managed by DSO.
- Act as a source of support, advice and expertise to staff.
- Ensure programmes or activities are planned, organised and delivered in accordance with this policy.
- Undertake safeguarding risk assessments of activities making suggestions for reasonable adjustments (e.g. to curriculum or assessment)

- Liaise with Marketing and Student Recruitment when dealing with under-18s or vulnerable adult students.
- Provide the Safeguarding Steering Group with any additional safeguarding policies or procedures for implementation at a local level such as a clinic operation.
- Receive relevant and appropriate training to undertake the role.
- Arrange the training, induction and guidance for all staff and volunteers appropriate for programmes or activities concerned, including drawing attention to this policy.
- Ensure all relevant staff have induction training covering safeguarding and are able to recognise and report any concerns immediately they arise to the appropriate person.
- Where appropriate, advise parents and carers of the existence of the Safeguarding Policy, which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later.
- Keep detailed, accurate and secure written records of referrals/concerns.
- Undertake Level 2 Safeguarding training and attend any relevant or refresher training courses at least every two years.
- Be trained in whistleblowing.
- Have a working knowledge of how Local Children's Safeguarding Boards operate, the conduct of a Child Protection case conference or strategy meeting and be able to attend and contribute to these effectively when required to do so; and the equivalent for vulnerable adults.