

## Safeguarding Vulnerable Groups: Safeguarding Policy

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### Policy Statement

1. **University statement on safeguarding children, young people and vulnerable adults requiring additional care.**
  - 1.1 Sheffield Hallam University organises, delivers and hosts a wide range of events and activities for, children, young people or involving vulnerable groups. Each year, thousands of individuals take part in our outreach and engagement activities and our University Open Days are attended by individuals from across this country and beyond. Some of our professional courses and training programmes require our staff and students to engage with children, young people and vulnerable groups, and in most cohorts, a number of our students will be classified as vulnerable. In all these activities and situations, the University considers the welfare of these groups to be paramount and the University is committed to safe practices that limit the risk of harm.
  - 1.2 This policy sets out the University's approach to safeguarding children, young people and vulnerable adults who come onto University premises or have contact with University staff, students (including students who might work with children and vulnerable adults as part of University courses) or contractors. This includes students who are vulnerable because they require additional care or support and/or are not in a position to protect themselves from harm. The policy establishes the principles and parameters within which we will work to ensure the safety and welfare of all vulnerable groups on campus or otherwise engaged in activities organised or hosted by the University.
  - 1.3 In its [Student Charter](#), the University undertakes to provide an environment that fosters an inclusive, supportive and collaborative learning community. This includes providing a safe environment for study and working at the University. As a higher education provider, in most cases, the University's students are adults with the mental and legal capacity to make their own decisions and look after their own financial and other affairs, and broadly, the University environment and its policies reflect this.
  - 1.4 However, whilst in most instances the University does not act *in the place of parents*, it has a duty of care to children and vulnerable adults as well as to staff, parents, and carers of those children and vulnerable adults that we work with. Some University activities will directly involve children and/or adults who are vulnerable and in need of additional protection from harm. In addition, some University curricula and activity may engage directly with young adults between the ages of 16 and 18. As a responsible higher education body and a charity, the University will seek to limit the risks of harm to those engaging in its activities, particularly those who may not be able to look after their own welfare, and will respond effectively if any concerns are reported or raised.

## Objectives

### **2. The objectives of the Safeguarding Policy are to ensure:**

- 2.1 that University staff work in a manner to protect children or young people (defined as individuals who are under the age of eighteen years) involved in University activities and adults (which may include students) who are vulnerable to harm and are not able to take steps themselves to prevent that harm;
- 2.2 that when children and vulnerable adults are engaging in University activities, they can participate in a safe and secure environment and their parents/carers can have confidence in the University;
- 2.3 the roles and responsibilities of University staff are clear in relation to responding to reported incidents of harm or threats of harm to children or vulnerable adults;
- 2.4 there are clear arrangements for reporting concerns and liaising with external authorities where action, advice or support is required to protect children and assist vulnerable adults to secure their safety;
- 2.5 the University is aware of and follows good practice in safeguarding children and vulnerable adults by alerting concerns, referring issues to and liaising with appropriate authorities, and recording and monitoring decisions and actions.

## Purpose

### **3. The purpose of the University's Safeguarding framework is to provide arrangements that ensure:**

- 3.1 the University will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly.
- 3.2 the University has robust processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. The University is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate. Please refer to the University's Disclosure and Barring Service (DBS) Policy for further information.
- 3.3 safeguarding referrals to the relevant statutory authority will be made on the basis of identified and considered risk. Information about risk assessment procedures is available within the Guidance on Safeguarding document.
- 3.4 University staff dealing with students or staff who are subject to safeguarding concerns will consider what support may be offered to them both from within the University (e.g. the employee assistance programme for staff and support from Student Services for students) and externally (e.g. signposting to local GPs, mental health services or Occupational Health (if they are a member of staff)). They will be encouraged to seek support and will be reminded of the support services provided by the University.
- 3.5 in a placement or work based learning environment (such as a professional or clinical setting) a member of staff or student should normally report any safeguarding concern in the first instance to the Safeguarding Officer of the provider, or employer. If the student or staff member feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer, or they do not feel they have had a satisfactory response, they should refer directly to the appropriate University Designated Safeguarding Officer.

- 3.6 research with children or vulnerable adults must comply with the [University Research Ethics Policy and Procedures](#). In some circumstances appropriate DBS checks are required by researchers and guidance on this may be sought from the relevant Chair of the Research Ethics Committee.

## Scope

### 4. The policy will apply:

- 4.1 to all employees and students of Sheffield Hallam University (University) and all University activities. This applies to all activities controlled or managed by the University that are aimed at children or vulnerable adults, whether they take place on University premises or elsewhere.
- 4.2 where activities are not aimed at children or vulnerable adults, staff may not have made specific provision for safeguarding but should nonetheless be aware of this policy. In these circumstances they should make themselves particularly aware of the reporting procedures associated with this policy. Staff members are obliged to raise and escalate any concerns that arise about the well-being of children or vulnerable adults in the course of University activities.
- 4.3 where staff or students undertake University activities with third parties who provide services for children or vulnerable adults, they shall have due regard to the safeguarding policies of the third-party provider. For official University activities (such as placement or events) the University staff supervising the University's involvement in the activity should satisfy themselves that the safeguarding arrangements are adequate for the activity.

## Policy details

### 5. The details of the policy's provisions are as follows:

- 5.1 The University is an adult learning environment and adopts the principles of Adult Safeguarding, suitably adapted to the needs of children depending on their age and understanding:
- 5.2 Empowerment – people, including young people, being supported and encouraged to make their own decisions and informed consent. The University recognises that for children aged under 16 years, legal consent must be given by a parent or carer with legal responsibility for the child, however this does not remove the responsibility to ensure that children have information appropriate to their age and understanding.
- 5.3 Prevention – having procedures that recognise that it is better to take action before harm occurs. This is supported by providing training to relevant staff so that staff involved in activities with children and adults in vulnerable situations receive clear and simple information about what abuse is, how to recognise the signs and what they can do to help.
- 5.4 Risk Assessment - the University requires proactive risk assessment of on-going University activities to identify those activities where participants are or are likely to be vulnerable and therefore safeguarding requirements need to be anticipated and considered. Areas of risk identified, summaries in appendix 4
- 5.5 Proportionality – For adults in vulnerable situations, the least intrusive response appropriate to the risk presented. For children, safeguarding procedures need to be proportionate to the risks and take account of the age and understanding of the child. The measures taken to protect young people who are 16 – 18, will take account of their growing autonomy and recognise that they are already in a position to take decisions about some aspects of their lives.

- 5.6 Protection – support and representation for those in greatest need. For children this means that they have the right to protection from abuse and a right to be safe in the activities that they or their parents and carers choose. For adults in vulnerable situations this may mean supporting the adult to report abuse or neglect and enabling them to make decisions about whether and how to participate in the safeguarding process to the extent that they choose. The University also recognises that on certain programmes there is an obligation to protect those individuals our students engage with.
- 5.7 Partnership – by working with the Safeguarding Boards for adults and children in the University’s region and with our placement partners in health and education in the region and in other regions in which we operate, to do what is within our control to prevent, detect and report neglect and abuse. Information sharing with partners to be in accordance with legislation, agreed protocols and where possible consent so that staff, students and children are assured that the University will treat any personal and sensitive information in confidence, only sharing what is helpful and necessary.
- 5.8 Accountability – ensuring accountability and transparency in delivering safeguarding, so that everyone understands the roles including the children and adults that the policy is aiming to protect.

### **Roles and Responsibilities**

- 6.1 The University has designated the following roles for coordinating the implementation of the Safeguarding Policy and procedures including ensuring that staff and relevant students understand their role and limitations
- 6.2 The Lead Safeguarding Officer (Strategic) is the University Secretary and who is responsible for the University strategy on Safeguarding and oversight of the Policy and is accountable for the University’s safeguarding practice.

The responsibilities of the Lead Safeguarding Officer (Strategic) are to ensure that:

- i a staff and appropriate committee structure is in place to fulfil safeguarding responsibilities.
  - ii safeguarding is prioritised at the most senior level within the institution.
  - iii procedures are in place for: managing breach of safeguarding allegations against students and staff; whistle-blowing and safe recruitment practices.
  - iv secure records concerning safeguarding are stored and shared appropriately.
  - v monitoring review systems are in place to incorporate new guidance and legislation into University policy and to test out existing systems.
- 6.3 The Lead Safeguarding Officer (Operational) is the Group Director, Student and Academic Services who leads on implementation of safeguarding systems across the University, working through the network of Designated Safeguarding Officers.

The responsibilities of the Lead Safeguarding Officer (Operational) are to:

- i oversee a network of Designated Safeguarding Officers (DSOs) who together will form a standing Safeguarding Implementation Group
- ii oversee the training of the Safeguarding Officers.

- iii develop and implement procedures, practice and guidance for safeguarding that address the areas of risk and are fit for purpose;
- iv implement the monitoring review systems.
- v help create links with relevant community services for safeguarding children and vulnerable adults
- vi have a working knowledge of how local Safeguarding Children Boards (LSCBs) operate, the conduct of a Child in Need of Protection Case Conference and/or Strategy meeting and be able to attend and contribute to these effectively when required to do so.

6.4 Designated Safeguarding Officers - each College and the Academic Departments and Directorates with responsibility for any of the activities identified in the Risk Assessment will have at least one senior manager who fulfils the role of a Designated Safeguarding Officer and may have deputies proportionate to the scale and volume of work in that area. The Designated Safeguarding Officer is accountable for the operation of safeguarding procedures in their College/Directorate.

The responsibilities of Designated Safeguarding Officers are to:

- i be a contact point for staff and students to raise issues about possible risk or harm to children or vulnerable adults and refer cases of suspected abuse or allegations to the Lead Safeguarding Officer (Operational).
- ii liaise with the Lead Safeguarding Officer (Operational) regarding on-going investigations where necessary.
- iii provide support, advice and expertise on safeguarding issues relevant to the activities in that College/Directorate.
- iv liaise with external agencies in the absence of the Lead Safeguarding Officer (Operational)
- v refresh training (their own and training of deputies) where significant changes are made to policy/legislation or the area is undertaking new activities involving children or the safeguarding risk profile in the area changes for other reasons.
- vi support the delivery of the staff awareness raising programme, ensuring staff in their College or service are aware of the policy and procedure relevant to their services
- vii keep detailed, accurate, secure and written records of any concerns raised and their outcomes if known.

6.5 On behalf of the Lead Safeguarding Officer (Operational), the identified Designated Safeguarding Officers within the University are expected to:

- i Manage and escalate referrals
- ii Refer cases of suspected abuse to other agencies and/or the Local Authority Designated Safeguarding Officer, where required;
- iii Support staff who make referrals to the local authority;
- iv Refer cases to the Channel programme, via the University's Prevent Lead where there is a radicalisation concern as required;

- v Support staff who make a referral to the Channel programme;
- vi Refer cases where a person is dismissed or left due to risk/ harm to a child to the Disclosure and Barring Service as required; and
- vii Refer cases where a crime may have been committed to the Police as required.

## **7. Safe Recruitment**

- 7.1 A statement of which staff and student roles require vetting and barring checks with links to the procedures to follow when DBS information raises concerns about suitability.
- 7.2 The University Human Resources and Organisation Development Directorate is responsible for ensuring that safe recruitment procedures are followed. All external applicants for jobs at the University are required to disclose unspent convictions as part of the application process. For posts which involve the role holder in undertaking Regulated Activity, the HR Directorate maintains the list of posts that require standard or enhanced levels of criminal record checks.
- 7.3 The University undertakes enhanced DBS checks (see Safeguarding Policy) on all new members of staff which are re-submitted for all staff every three years. Under no circumstances will any staff member be left unsupervised with the children or vulnerable adults? until the report has been returned from the Disclosure and Barring Service.

**Safeguarding Policy Statement Ver. 1.4**

**Author: Michaela Boryslawskyj, University Secretary**

## Appendix 1: Key contacts

Name	Title
Sam Moorwood	Head of Work Based Learning
Jess Inglis	Head of Outreach & Widening Participation
Charmaine Myers	Academic Practice and Learning Innovation
Richard McGloin	Director of Commercial Services
Gemma Styles	Head of HEPP
Carol Saunders	Head of Student Help and Advice
Ursula Klingel	Head of Student Wellbeing
Victoria Jackson	Head of Disabled Student Support

## Appendix 2: Definitions and Abbreviations

"Child" or "Children" means a person or persons under the age of eighteen.

"Safeguarding" is the process of protecting vulnerable people from harm, distress, crime or other forms of abuse.

"University premises" means all buildings and land that is owned, operated or controlled by the University.

"University organised events" means all activities which are arranged by University staff or students, which are on premises or affected by our activities. Where events are organised by Sheffield Hallam University Students' Union the basic principles of the policy will apply, although, as the Union is independently managed and controlled, there may be bespoke supporting procedures and differences in application.

"University staff" means all employees of the University and authorised agency staff working on our behalf on the premises.

"Vulnerable adult" means any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to care of themselves, or unable to protect themselves against harm or exploitation.

## Appendix 3: Associated documents

1. SHU: Safeguarding Vulnerable Groups: Procedures for reporting concerns (Procedure, in draft)
2. SHU: Safeguarding Vulnerable Groups: Responding to Safeguarding concerns
3. SHU: Safeguarding Vulnerable Groups: Guidance for staff (in draft)
4. SHU: Safeguarding Children in Research Contexts
5. SHU: Code of Practice for Researchers Working with Vulnerable Populations
6. SHU: Local Safeguarding Arrangements: Widening Participation, Outreach, UK Student Recruitment and Schools & College Engagement
7. SHU: Safeguarding Practice Statement – Higher Degree Apprenticeships on Programme

## Appendix 4 – Risk Assessment

The areas of risk identified in the risk assessment are summarised as follows:

- i Placing an unsuitable person in "Regulated Activity" - when the University places students in training placements in schools, hospitals and other care activities that are defined in law as Regulated Activity, the University is deemed to be acting as a Personnel Supplier/employer. The University has a legal duty to ensure that the people it places in Regulated Activity are likely to be suitable for the role. It is a criminal offence for a Personnel Supplier/employer to provide a person to work in Regulated Activity who has been barred from further working with that identified group children and/or vulnerable adults. There is a high risk of harm where the University inadvertently places someone who is unsuitable in such a role and if the person has been barred from Regulated Activity, it can amount to a criminal offence by the Personnel Supplier/employer. The Faculties involved in selecting students for undertaking courses which involve training in Regulated Activity have procedures for disclosing criminal convictions and assessing students' suitability for working with children and vulnerable people. Where concerns about safeguarding arise, there are protocols for working with the placement setting to address the matter and internal procedures for reviewing students' fitness to practise.
- ii Young students, i.e. those aged 16 – 17 years: - the University is an adult learning and research environment and does not act in loco parentis for young students. The benefit of accepting younger students who have the academic requirements to enter higher education and are almost adults is that they do not have to wait until they reach 18 years old in order to make academic progress. The risks include that parents may not understand that their child is moving to an adult environment; parents may assume a level of supervision and guardianship that the University does not provide; and that the young student is not sufficiently mature to cope with the amount of liberty and responsibility that comes with university life. The University's Under-18s Policy and procedures seek to reduce and manage these risks by ensuring that there are proportionate oversight and support mechanisms for the small number of young students.
- iii Young staff or trainees – apprentices and placement students: the University currently has very few workers under the age of 18 but occasionally will accept students from schools and colleges on short work experience or shadowing placements. There are benefits to the trainee, the University and the wider community in the University engaging with local schools and colleges in this way. There is a risk that staff not used to working with children may not take account of their inexperience or try to exploit it. These risks can be mitigated by ensuring that placements are only arranged with the approval and cooperation of the trainee's school or college. The member of staff who has agreed to supervise the placement is responsible for conducting a Health and Safety risk assessment of the activities in which the child will engage including the work environment, equipment and work methods. Supervisors should also make themselves aware of the school/college safeguarding procedures and reporting routes. Details of relevant contacts at both organisations, to whom reports should be made of any incidents or concerns, should be included in the written placement letter/agreement between the University and the school/college. Should the University decide to develop apprenticeship opportunities for younger people, then the HR arrangements for supervising young trainees would need to be developed appropriate to the risks and needs of the trainees.
- iv Students with additional needs for care or support. Some students need to access additional advice and support for example to transition from local authority care or to adjust for long term



health conditions or disabilities. The University does not automatically assume that such students are any less able than other students to make their own decisions. There are risks that staff advising and supporting students with additional needs can develop close working relationships with students that may be open to abuse. In some cases, students with additional needs may be used to depending on professionals for care and decision-making and place a high degree of trust in staff in terms of their personal and financial well-being. Students need to be able to rely on the University selecting and training staff in these roles who are worthy of such trust. The University's Student Support Services have policies and procedures to ensure that staff work to the adult safeguarding principles, are aware of relevant safeguarding risks and have reporting arrangements should any concerns arise.

- v Students in distress. The University's object is to provide education and advance knowledge. Its welfare services are targeted at providing information and advice to help its students make the best of the education opportunities available. This advice and support are intended to help students cope with the challenges of university life and make their own decisions. The University recognises that some students are living independently for the first time but that, as adults, students are primarily responsible for taking care of their own welfare. Occasionally, a student's mental or physical health means that they do not have capacity to take adequate care of their own welfare. To manage the risks that students in distress may pose to themselves and others, the University provides protocols for referring students to specialist staff within the University who can make contact with health professionals in the community and/or the student's next of kin. There is advice available to all staff on responding to common student welfare issues and queries but where there are serious concerns about a student's well-being and their capacity to look after themselves they should raise it with the relevant contact in the student's College, via a Senior Student Support Adviser, or the Student Transition and Welfare Manager who will escalate this to the University Cause for Concern Group.
- vi Outreach work with children. The University's objectives include encouraging people to enter higher education where they would be the first in their family to do so and from communities that are under-represented in higher education. To support this objective, the University organises engagement activities with students in primary and secondary schools to raise awareness and encourage them to aspire to higher education. Staff organising these activities have access to children and supervise colleagues and volunteers working with children. The nature of the engagement activities means that the risk of University staff posing a threat or identifying a safeguarding risk to the children is relatively low. The Head of Outreach and Widening Participation has agreed a safeguarding scheme and procedures to minimise the risk of unsuitable staff and volunteers working with children; supervision arrangements to ensure that University staff and students work safely in schools and guidance on behaviour to minimise the risk of allegations being made against University staff. Where faculties and other directorate teams support engagement activities for children - e.g. homework clubs, taster sessions -they should liaise with the Head of Outreach and Widening Participation to ensure that robust arrangements are in place for staff checks, safeguarding training and safe operating.
- vii Students undertaking placements or volunteering with children and vulnerable adults. In addition to students who are training to work with children and vulnerable adults, some students undertake activities with children in connection with particular projects such as the employability projects arranged by the Venture Matrix Team, College arranged internships or volunteering initiatives. Where internships and volunteering opportunities give participants access to children

there may be a risk of unsuitable people abusing that access or unwarranted allegations being made against students or staff involved in these activities. In order to manage the risks, placement teams have procedures for assessing the suitability of participants; ensuring they are supervised by the placement setting when they are working with children and providing guidelines on student conduct to minimise the risk of unwarranted allegations. Venture Matrix has a safeguarding lead and established procedures for managing these risks. Faculties that do not have established local procedures should take advice from the College Safeguarding Lead or Directorate of Governance and Sector Regulation about appropriate risk assessment and management measures appropriate to the activity.

- viii Research involving young or vulnerable research subjects. Some University staff engage in research involving children or vulnerable adults. The nature of the researcher's access to children; if and how the access is supervised will vary depending on the nature of the research. To manage this risk, the University Research Ethics Committee has established guidelines for conducting safe research involving children and vulnerable adults. The safeguarding arrangements are assessed for each proposal as part of the University Research Ethics approval which will also determine what level of checks, supervision, participant and parental consent is required for the research.
- ix Applicants, students or staff with relevant criminal convictions are assessed as posing a risk to the welfare of other students or staff. The University is responsible for providing its students, staff and other visitors with a reasonably safe environment in which to work and study. A previous criminal conviction will not necessarily bar an applicant from being offered a place or job at the University but applicants, staff and continuing students are required to disclose relevant unspent criminal convictions so that the University can assess:
  - a. the extent to which the individual may pose a threat to the safety of others in the University community and
  - b. whether there are legal or professional issues arising by employing the individual in a particular role or admitting the applicant to a particular course.
- x For staff, the University's Directorate of Human Resources and Organisation Development has procedures requiring taking up of references and disclosure of relevant unspent criminal convictions by applicants for employment; for assessing the risk of harm of any positive disclosures and making decisions about suitability for employment. For students, the Admissions process includes a requirement that applicants disclose relevant unspent criminal convictions and there are arrangements for considering and making decisions about such disclosure through a University Criminal Convictions Panel. Where the University becomes aware of an existing student receiving a criminal conviction, the Dean of College and Deputy Registrar will consider whether it is appropriate to consider the offence under the Student Disciplinary Regulations depending on the circumstances of the offence.

- xi Once admitted, or it is deemed appropriate for a student to continue studying, then a risk assessment is undertaken by the Director of Student Support Services consulting with relevant external agencies eg police, probation, etc. This will determine the mitigating actions and support that need to be put in place.
- xii A child or vulnerable student is deemed to be at risk of being drawn into terrorism. The Counterterrorism and Security Act 2015 requires the University to have due regard to preventing people being drawn into terrorism. The University's Prevent procedures include reporting routes for concerns to be escalated to the University's Prevent Lead who would liaise with relevant safeguarding officer where it was identified that a child or vulnerable adult may be at risk of being drawn into terrorism.
- xiii Members of the public using University facilities. The University is an open campus in the city centre. Its location near the bus and train stations mean that it is a space that members of the public may well use as an access route or to visit facilities. Some University services such as catering outlets and sports facilities accept external bookings. Where facilities accept bookings for service users who are under-18 they have procedures requiring the booker to make arrangements for the supervision and safeguarding of children in their group. Directorates that regularly provide events or activities for children, have designated staff and local procedures for risk assessing arrangements to ensure that the risk of harm to children is minimised and taking appropriate action to address concerns about child welfare that may arise during activities.
- xiv Safe Spaces initiative. The University participates in the City's Safe Spaces scheme. The scheme provides places that people with health or learning difficulties can go if they become lost, confused or feel threatened while in the City Centre. University staff providing reception and facilities management services may find that they are approached by people visiting the University as a Safe Space. Sometimes staff are involved in assisting other members of the public who are vulnerable or unsupervised children who visit the premises uninvited. For people using the University as a Safe Space there are protocols for contacting relevant services to refer the person. For other uninvited visitors who may be vulnerable, the University does not assume a duty of care to safeguard them and will seek to refer them to the Police or contact an appropriate adult where this can be ascertained or relevant services if they appear to be at risk of harm.

## **Appendix 5: References**

[Government Policy Paper: Safeguarding children and young people](#)

[Sheffield Safeguarding Children Board](#) (SSCB) is the statutory body responsible for overseeing safeguarding children arrangements in the city. The Sheffield Safeguarding Children Board and the Safeguarding Children and Independent Reviewing Service are based on Floor 3, Howden House, Union Street, S1 2SH.