

Safeguarding Procedure	
Operational Owner:	Designated Safeguarding Lead (DSL)
Executive Owner:	Chief Student Officer
Effective date:	1 March 2022
Review date:	28 February 2023
Related documents:	<p>Relevant University Policies and External Guidance</p> <p>Dignity at Work and Study Policy</p> <p>Sexual Misconduct Procedures</p> <p>University Prevent Policy</p> <p>Data Protection Policy</p> <p>Ethics for teaching and research policy</p> <p>Criminal Convictions Policy</p> <p>Guidance on the Disclosure and Barring Service (DBS) on Surrey Recruit</p> <p>University Admissions Policy</p> <p>Students under-18 – admission and support</p> <p>Public Interest Disclosure Policy (Whistleblowing)</p> <p>University Events Policy</p> <p>University Research Integrity Statement</p> <p>Regulations on Support to Study</p> <p>Code on Good Research Practice</p> <p>Health and Safety Policy</p> <p>Surrey Multi-Agency Safeguarding Hub (MASH)</p> <p>Department of Health Guidance on Regulated Activity (adults)</p> <p>Department for Education Guidance on Regulated Activity (children)</p> <p>Department for Education Keeping children safe in education 2021: Statutory guidance for schools and colleges</p>

Approval History

Version	Reviewed by	Brief reason for review	Approved by	Date
1	<ul style="list-style-type: none"> • CSO • Head of Wellbeing and Welfare/ Designated Safeguarding Lead (DSL) • Interim Head of Student Experience • Head of Security • Director of Health and Safety • Wellbeing Adviser • Commercial Lawyer • Interim Data Protection Officer and Head of Information Governance • Employee Relations Manager • Director of HR • Head of Events 	New	Executive Board	2/22
	Members of the Wellbeing Strategy			

	Group			
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1. Introduction

1.1 Purpose

- 1.1.1 The purpose of these Procedures is to set out the University's approach to safeguarding of Children, Young Persons and Adults at Risk.
- 1.1.2 The University is mindful of its duty of care and legal obligations.
- 1.1.3 The University is subject to a general duty of care at common law to deliver its educational and pastoral/wider services to the standard of the ordinarily competent institution, and, in carrying out its services and functions, to act reasonably to protect the health, safety and welfare of its students. It is however recognised that universities are primarily education providers not professional health or support providers, and do not act in loco parentis. The University is also subject to a common law duty of care to both its employees and visitors.
- 1.1.4 In addition, whilst there is no specific legislation for Higher Education Institutions (unlike schools or colleges), the University is mindful of its duty of care and further legal obligations under statute, including, but not limited to, the Health and Safety at Work Act 1974, Safeguarding Vulnerable Groups Act 2006, Counter-Terrorism and Security Act 2015, and Equalities Act 2010. The University is further mindful of its obligations derived under its contractual provisions with students.
- 1.1.5 Bearing in mind the various sources of its duty of care, it is recognised that the University has an enhanced duty towards those under the age of 18 and vulnerable adults to ensure that they are safeguarded against the risk of abuse, and to pay due regard to the need to prevent people from the risk of being drawn into terrorism as part of its safeguarding duties (as defined in the University's Prevent Policy). In order to assist it to discharge its duty of care, the University is required to ensure that it has in place effective and robust systems, policies and procedures, together with providing training to relevant staff. The framework for this provision in respect of safeguarding is set out in this document.
- 1.1.6 These Procedures applies to all members of the University. However, it is specifically aimed at staff, students and volunteers who encounter the following groups through teaching, research, professional services and outreach activities:
- Children (up to the age of 18)
 - Adults at Risk
- An Adult at Risk of abuse or neglect is defined as someone aged over 18 or over who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.
- 1.1.7 These Procedures seeks to support these activities and to offer assurances to both staff, students, volunteers and visitors that, through its implementation, the University seeks to protect Children, Young Persons and Adults at Risk and to keep them safe from harm when in contact with University students and staff (whether acting in a paid or unpaid capacity).

1.2 Scope

These Procedures applies to all University activities undertaken at the University's Guildford campus, and where off-campus activities are not subject to safeguarding procedures elsewhere.

These Procedures applies to all staff and students of the University, including those that do not

have a specific role in relation to safeguarding matters, who may come into contact with a Child or Adult at Risk as part of their work or activities. This policy also applies to situations where a student or staff member may pose a safeguarding risk outside of university activities. For the purposes of these Procedures this includes staff of the Students' Union. The University and the Students' Union are committed to working together and sharing information in order to safeguard the interests and wellbeing of Children and Adults at Risk, e.g. in relation to individuals and activities with student societies and volunteering.

The University reserves the right to request appropriate safeguarding policies and assurances from contractors and placement providers.

The University expects organisers bringing under-18s onto its premises, e.g. for interview, applicant and open days, conferences, summer schools, school visits or work experience to ensure they have local safeguarding procedures and are familiar with relevant University policies

1.3.1 Definitions

Abuse - can be in the form of

- Physical abuse
- Child sexual exploitation
- Neglect or acts of omission
- Extremism
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery and child trafficking
- Discriminatory abuse
- Organisational abuse

As outlined by [Working Together to Safeguard Children](#) (Dec 2020) and [Care Act 2014](#)

Adult at Risk - an adult who:

(a) has needs for care and support,

(b) is experiencing, or is at risk of, abuse or neglect, and

(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Child - For the purposes of this policy, the University defines a child as a person who is under the age of 18.

Prevent - The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. The Office for Students requires University to comply with, and report annually, on how they comply with the guidance, as a condition of their Registration

Safeguarding - For the purpose of this policy, the University defines safeguarding as protecting children and adults at risk who may be at risk of exploitation (including radicalisation), harm, neglect or abuse as well as promoting the welfare of our community.

2. Procedures Principles

The University of Surrey takes seriously its responsibility to safeguard and promote the welfare of

any member of the University community and to work together with other agencies to ensure that adequate arrangements are in place to identify, assess, and support any member of the University community who may be suffering from abuse, harm or neglect; or is at risk of being drawn into terrorism and being radicalized, we will do this by following these principles.

- a) The University will take all safeguarding concerns relating to Children and Adults at Risk seriously, will consider concerns fully and will report any such concerns in a timely manner to the relevant person or body.
- b) Safeguarding referrals to the relevant statutory body will be made based on identified and evaluated risk, as per the procedures outlined in section 3 of these procedures.
- c) Local authorities have the responsibility to lead in investigating safeguarding concerns, but every organisation and everyone who encounters a Child or Adult at Risk has a responsibility to help keep them safe.
- d) The University will ensure it maintains central records of any safeguarding concerns and any referrals made consequently. Any records will be kept in accordance with the University's [Data Protection Policy](#).
- e) University staff working with students or staff who are the subject of safeguarding concerns will consider what support may be offered to the individual and will signpost accordingly. This may include referral to internal and/or external services.
- f) In a placement and/or professional work experience setting, a member of staff or student should normally report any safeguarding concern to the employer's Designated Safeguarding Lead, as per the employer's policy. As a matter of course, the safeguarding concern must also be reported to one of the University's Designated Safeguarding Lead (DSL) as per the procedure set out in section 3.
- g) Research carried out on, or with the participation of, Children or Adults at Risk must also comply with the University's requirements research with humans as outlined in the [Research Ethics and Guidance](#).
- h) The University has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of Children or Adults at Risk. 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 Checks (DBS) guidance for further information.
- i) Specific areas of University activity, for example admission of students, the governance of research, and the organisation of widening participation summer schools, have local safeguarding procedures.

3 Summary of Procedures

Examples of safeguarding matters are provided in Appendix 1.

Reporting a Safeguarding Concern

Making the Report

The duty to investigate suspected abuse or harm rests with statutory services, primarily Social Care Services and the Police.

Sources of concern:

Examples of safeguarding concerns include, but are not limited to:

- a. A child or adult raises an allegation of abuse, harm or other inappropriate behaviour.
- b. A student or staff member discloses information involving themselves or others which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals or children involved in University activities.
- c. There are suspicions or indicators that a Child or Adult at Risk is being abused or harmed

or is at risk of exploitation, harm or abuse (including radicalisation). The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member's responsibility to decide whether a Child or Adult at Risk has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have.

- d. There are observable changes in a Child or Adult at Risk's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation).
- e. A concern is raised that an individual presents a risk of abuse or harm towards a Child or Adult at Risk in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material.
- f. Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

Reporting Safeguarding Concerns

A safeguarding concern is reported by completing the Safeguarding Reporting Form (appendix 3). The form should be submitted within one working day by email to centreforwellbeing@surrey.ac.uk and the DSL will respond as promptly as possible, but generally within same working day of the incident giving rise to the concern. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one due to uncertainty. Staff may wish to discuss safeguarding concerns with the Designated Safeguarding Officer should they be in any doubt as to whether to make a report.

All reports will require the Safeguarding Reporting Form to be completed, however if a student or staff member has an immediate and significant concern for a child or adult at risk's immediate safety, they may refer the matter directly to the Police or Social Care Services and DSL before completing the reporting form.

Contact details are provided on the University's Safeguarding pages.

For all reports of a safeguarding matter

- a) Listen carefully and stay calm.
- b) Take all complaints and allegations seriously.
- c) Ensure the immediate safety of the person affected.
- d) Reassure the individual they have done the right thing by telling you and what they have reported will be escalated but do not assure their confidentiality.
- e) Keep questions to an absolute minimum, do not interrogate the individual or ask leading questions. Any questions should be about any immediate health and safety concerns.
- f) Explain to the individual that you will need to report the matter to the University's DSL
- g) and explain the University's internal process as outlined below.
- h) Request consent to share the information with the DSL relevant external agency.
- i) Complete a report as per Appendix 3 Provide as much detail as you can.

Reports about Safeguarding concerns

If you suspect or are concerned that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation).

- a) Never wait until a child or adult at risk tells you directly that they are being abused before acting.
- b) If you are concerned ask the child or adult if everything is OK. Support the child or

adult as appropriate. If a disclosure is made follow the steps above.

- c) If you are still unsure, discuss with the DSL.

On receipt of a referral the Safeguarding Officer will limit their enquiries to that necessary to undertake a risk assessment and:

- a) Address any serious and immediate risk to the Child or Adult at Risk.
- b) Preserve any evidence likely to be lost before external agencies can respond.
- c) Determine the appropriateness of a referral to Surrey Social Care Services, the Police or another appropriate agency and provide sufficient information to the relevant external agency to enable an effective response.
- d) Determine any further University procedures which should be invoked such as Fitness to practice or staff suspension in partnership with OSCAR (Office for Student Appeals, Complaints and Regulations) or Human Resources.
- e) Identify any internal/external support required by the Child or Adult at Risk.
- f) They may decide that no further action is required.

If a referral to an external agency is deemed appropriate, the DSL or Safeguarding Officer or their nominee will make the referral.

If a member of staff wishes to discuss a potential referral before completing the Form, they may contact a Safeguarding Officer to discuss the referral in principle without providing any names or identifying details by emailing centreforwellbeing@surrey.ac.uk

Where the suspected abuse is alleged to have been carried out by a staff member, the University will work alongside external agencies, including but not limited to the Local Authority Designated Officer (LADO) during any investigations. If necessary, the staff [disciplinary procedures](#) may be invoked.

A Flowchart on procedures for raising a concern is available as Appendix 2.

Prevent

Where Prevent concerns are raised about a person who is responsible for a Child or Adult at Risk and the concerns raised may indicate a risk to the safety of the Child or Adult at Risk or wider community, this should be reported following the same process above. Any Prevent concerns raised with the DSL will be shared with the Prevent Lead for the University.

Record keeping

The Designated Safeguarding Officer will be responsible for ensuring that a full record is kept of the risk assessment process and of any action taken subsequently. This will be done in accordance with the University's Data Protection Policy.

University of Surrey students under the age of 18.

Admission requirements and support of students under 18 years of age is outlined in the [University Admissions Policy](#)

In admitting students under the age of 18 the University acknowledges that it will have an enhanced duty towards these individuals as they are Children. The following steps will be taken to ensure that the University meets its obligations to safeguard students under the age of 18:

- As per the process set out in the [University Admissions Policy](#), the University is not in loco parentis and the [Students under-18 – admission and support](#) guidance outlines the support provided in advance of arrival. Once the student is enrolled, the standard support

- mechanisms for all students will be in place.
- Where the Child is looked after away from home, appropriate contact will be made with their Local Authority, including with their Social Worker and referral made to the University Student Success Team. A looked after child is a child who lives with foster parents, in a residential children's home or in a residential setting such as school, defined by [NSPCC 2022](#)
 - The University will ensure that it holds a list of the student's emergency contact details, in particular those of parents/ guardians.
 - The University will ensure that a DBS disclosure has been obtained for staff who the University considers will have close, unsupervised contact with the student. This is managed by HR.
 - Any students who share accommodation with those under 18s are not advised that they are sharing with a Child and the University has no right or ability to undertake safeguarding checks on those who live or study with students who are under 18 years of age.
 - The University will ensure that the Chief Student Officer, Security, Residential Wardens, the Head of Student Experience, Head of Wellbeing and Welfare and relevant contacts in Schools/Departments are provided with a list of students under 18 years of age.
 - The University will never allow students under the age of 16 to live in University-owned accommodation.
 - Students or staff living in University-owned accommodation with children under 18 years of age, are under the responsibility of the parent(s), not the University.

External Organisations' Use of University Facilities

A number of the University's facilities, most notably sporting facilities, are hired by external organisations for use in events that may involve Children or Adults at Risk. In such cases the University has no control over, and assumes no liability for, the conduct of individuals from these organisations. However, the University wishes to ensure that safeguarding risks are mitigated as far as possible for such external events.

In organising any event the University and the external organisation will comply with the University Events Policy.

All external organisations requesting the use of University facilities for activities involving Children or Adults at Risk will be asked to sign a declaration confirming that they have obtained appropriate checks on their staff and volunteers before they are permitted to use University facilities. The organisation will also be asked to confirm they have a Safeguarding Policy in place managed by the person organising the event.

If an organisation that works with children or adults at risk does not have a Safeguarding Policy in place they will not be permitted to use University facilities. Any queries should be escalated to the University Events Manager.

6 Disclosure and Barring Service (DBS) Checks

The University will ensure that any staff or students working with Children or Adults at Risk on a substantial basis, or having close, unsupervised contact with Children or Adults at Risks, will have an appropriate DBS check carried out. This is part of the Surrey Recruit process prior to employment of the staff member, with advice provided by Human Resources.

Staff and students without satisfactory disclosure from the DBS should not be given unsupervised access to children/adults at risk and it is the responsibility of their line manager or supervisor to ensure that procedure is followed. Responsibility for ensuring such checks are conducted rests

with the line manager, supported by HR.

The procedure for carrying out DBS checks is outlined in the [University's Guidance on the DBS](#) managed by HR.

DBS checks will be renewed every 3 years, upon significant change of role or remit.

7 Governance Requirements

Responsibility

Overall responsibility for the University's response to safeguarding rests with the Chief Student Officer.

The Head of Wellbeing and Welfare is the Designated Safeguarding Lead.

The Director of Human Resources and the Head of Student Experience are the University's Designated Safeguarding Officers respectively for staff and students.

Their responsibilities, or that of their nominees, include:

- a) Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date;
- b) Acting as a source of support, advice and expertise to staff on matters of safeguarding;
- c) Acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
- d) Acting upon concerns as appropriate in the circumstances for example by making external referrals to local authorities or police;
- e) Produce safeguarding statistics and annual overview;
- f) Providing training to staff, as required.

All members of the University are expected to play an appropriate role in reducing the risk of harm to staff and students. Initially, all staff must pass on and discuss their concerns swiftly with a relevant party so that the issue can be explored with someone who has a specialist understanding of safeguarding, this may include completing a referral form. In the first instance, staff should discuss concerns with their line manager who can then escalate as appropriate.

Local authorities have the responsibility to lead in investigating safeguarding concerns referred to them.

8. Monitoring

The DSL will record any incidents relating to safeguarding concerns and will report them annually in an anonymised form to the Prevent and Safeguarding Steering Group.

The Group will also keep up to date with government and HE practice assuring itself that the University is meeting its duty to safeguarding our students and staff.

The Chief Student Officer is responsible for providing an annual report to Executive Board and Council.

Monitoring will provide a strategic understanding of the scale and trends of the safeguarding concerns to allow for more targeted intervention and improved proactive approaches.

9. Implementation / Training/Communication Plan

The University will endeavour to increase awareness and understanding of safeguarding responsibilities, to ensure all staff understand what safeguarding is and what they should do if they become concerned about a student.

Safeguarding procedures will be included in briefing packs, handbooks and presentations as part of pre-event staff briefing sessions for our events which attract under 18 audiences including Open Days and Graduation.

These Procedures will be published on the University website and publicised to staff via the Leaders' Alert and SurreyNet. There will be direct email communication to colleagues in relevant offices.

10. Exceptions to these Procedures

Providing a safe environment and response to known risks to reasonably protect students from harm is required by legislation. There are no exceptions to these Procedures. Each case will be treated in line with these Procedures and individual circumstances.

11. Review and Update

These Procedures will be reviewed every year while the procedures are new, or sooner if a change in legislation requires that this is necessary. Any minor changes, such as changes to roles, will be undertaken by the operational owner.

12. Legislative context

The [Health and Safety at Work Act \(1974\)](#) places a duty on the University to do what is reasonably practicable to protect the health safety, and welfare of staff, students and visitors.

Other government policies relevant to safeguarding are:

- [Care Act 2014](#)
- [The Children Act \(1989\)](#)
- [The Data Protection Act \(1998\)](#)
- [The Safeguarding Vulnerable Groups Act \(2006\)](#)
- [The Protections of Freedom Act \(2012\)](#)
- [The Counter-terrorism and Security Act \(2015\)](#)
- [Working together to safeguard children \(2018\)](#)
- [Department for Education Keeping children safe in education 2021: Statutory guidance for schools and colleges](#)

13. Stakeholder Statements

Equality:

The Equality & Diversity Advisor has reviewed this procedure and feedback has been incorporated.

Health & Safety:

Health and safety implications have been considered during the drafting and are incorporated (where necessary) into this procedure.

ICU:

The Interim Data Protection Officer and Head of Information Governance has reviewed this procedure and feedback has been incorporated.

Appendix 1 - Examples of safeguarding concerns

Examples of types of situations which may present a safeguarding concern are provided below. This list is not exhaustive and staff will need to exercise professional judgement in determining whether there are safeguarding concerns which need to be considered.

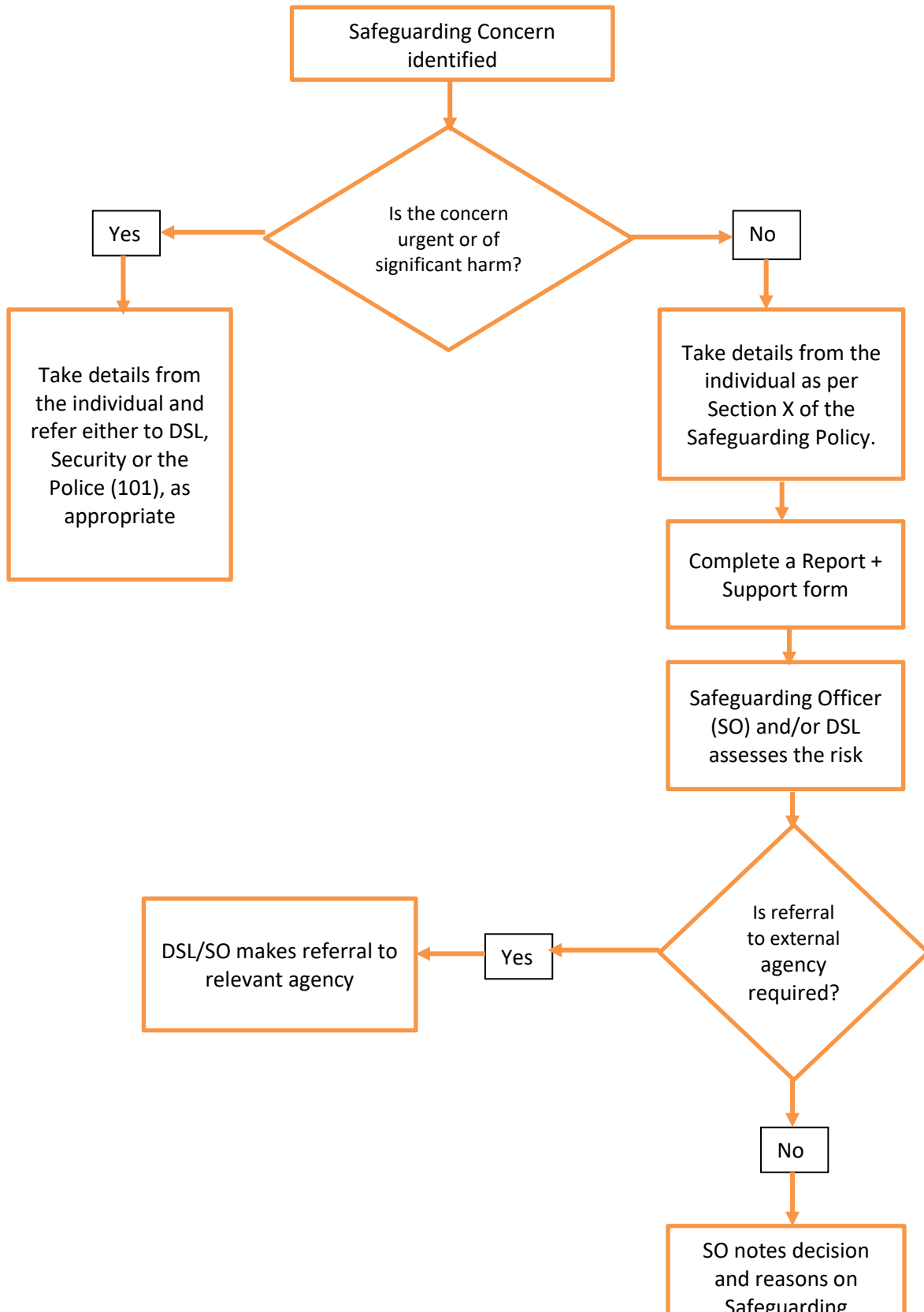
- a) A Child or Adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour;
- b) A student, staff member or visitor discloses information involving themselves, family members or any other child or adult which gives rise to concerns that an individual may be harming or abusing a Child or Adult at Risk;
- c) There are suspicions or indications that a Child or Adult at Risk is being abused or harmed or is at risk of exploitation (including radicalisation), harm, neglect or abuse.
- d) There are observable changes in a Child or Adult at Risk 's appearance or behaviour that may be related to exploitation, harm or abuse, including radicalisation.
- e) A concern is raised that an individual presents a risk of abuse or harm towards a Child or Adult at Risk. If there is a concern that a member of staff or student may present such a risk the University will carry out a risk assessment and, if appropriate, invoke other appropriate policies, including Disciplinary or Fitness to Study procedures or the Criminal Convictions Policy.
- f) Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.
- g) A historic disclosure of sexual or physical abuse is made, where the perpetrator still has access to Children or Adults at Risk.
- h) Activities that should be discussed with DSL or line manager with safeguarding in mind eg. work experience placements, outreach activity to engage under 18s, visiting schools, online chat or events for prospective students.

The following incidents MUST be reported to the DSL/ Safeguarding Officer:

- a) If a Child or Adult at Risk is accidentally hurt
- b) If you are concerned that a relationship is developing with a Child or Adult at Risk, which could represent an abuse of trust
- c) If you are concerned that a Child or Adult at Risk is becoming attracted to you
- d) If you are concerned that a colleague is becoming attracted to a Child or Adult at Risk
- e) If a Child or Adult at Risk misunderstands or misinterprets something you have done in a way which could be construed to be abusive or harmful
- f) If you have to use reasonable physical restraint to prevent a Child or Adult at Risk from harming themselves or another, or from causing significant damage to property
- g) If a Child or Adult at Risk reports an allegation of abuse regarding a member of an external organisation using University facilities.
- h) Any students under 18 or adult at risk with mental health issues
- i) Any students under 18 or adult at risk involved with criminal activities or prevent concerns
- j) If a Child or Adult at Risk reports concerns regarding a forced marriage or Female Genital Mutilation.
- k) Any students under 18 or adult at risk if they go missing.

Definitions and signs of child abuse: <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

Appendix 2 – Safeguarding Flowchart



Appendix 3 - [Safeguarding Safety Concern Form](#)

Please use this form to outline the nature of your concern.

If you cannot complete a section, or feel a section is not relevant then leave it blank.

Your disclosure will be treated sensitively. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain.

If there is immediate risk, please call 999 to report to the Police and/or Ambulance service

Name of Child/Adult at Risk Student/Staff member (if known):

Date of birth or age:

School/Department (if known)

Gender: (M/F/other)

Address

Description of the safeguarding issue (see Safeguarding Procedures for more information about what constitutes a safeguarding concern). Your description might include a factual account of something you have witnessed, they have disclosed or an account of something a third party has reported to you.

Time, location, date of the incident/s: (if known)

Student's/Staff member's account: (if known)

Any other observations/information: (including any physical injuries, use a body map)

Any previous reports

Any action you may have taken:

Have you discussed this referral with the affected party? If not, please explain

Signed:

Date:

Name(print):

Position:

Your Preferred Contact Method (Tel ext.: mobile: email)

Please continue onto another page if necessary, ensuring it is securely attached to the safety concern form.

Please send this information to the centreforwellbeing@surrey.co.uk to send on to the DSL

Section 2 to be completed by the DSL

Is the child or adult at risk who is the subject of concern at immediate risk?	
Yes/no	
Details	
Does the incident relate to an allegation about a student or member of staff?	
Should the staff or student be referred to HR or OSCAR for consideration of disciplinary action?	
Does the reporting incident require referral to a local safeguarding team?	
Does the reported incident constitute a criminal offence and requires a referral to the Police?	
Actions undertaken:	
No further action Referral to HR/OSCAR Reported to local safeguarding team Reported to School DSL Referred to existing policy/procedure Referred to internal department Reported to Police	
Details	
Signed	
Date	