



Safeguarding Policy

The University of Buckingham Safeguarding Framework comprises of a number of policies and procedures to ensure students are supported throughout their time studying at the University.

Policy owner:	Head of Student Services
Implementation date:	March 2024
Review date:	March 2026
Related policies:	Substance Misuse Policy
Related procedures:	Safeguarding Procedure Student in Crisis Procedure Student Death Procedure

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In an emergency: If a student, member of staff, or member of the public is in immediate danger or at risk of harm to themselves or others contact the emergency services on 999 and notify Security on 07860 834802.

Version History

Version	Approved by	Revisions made	Date
V1	Council	Policy introduced	01/10/18
V2	Council	Terminology, responsibilities	27/04/21
V3	Senate	Structure of document	11/03/24
V4	Registrar & Chief Administrative Officer and Head of Student Services	Amendment of staff roles and names due to staff changes.	11/10/24
V5	Registrar & Chief Administrative Officer and Head of Student Services	Amendment of staff roles and names due to staff changes	21/07/25

1. Purpose

- 1.1 All universities have a duty to take reasonable and necessary steps to ensure that children, young people and adults at risk are safe and that reasonably foreseeable harm does not occur. This policy and accompanying procedure ensures the University undertakes its statutory responsibilities in relation to the safety and welfare of children, young people, adults at risk with whom the University's work brings it into contact.
- 1.2 This policy sits under University's Safeguarding Framework, and together with the other policies and procedures under this framework, ensures the University can provide a safe and secure environment whilst supporting student welfare and wellbeing.

Scope

- 1.3 This policy applies to all members of the University including staff, students, contractors, volunteers (irrespective of whether they act in a paid or unpaid capacity) and visitors, who may be working with children, young people or adults at risk through teaching, research, professional services and outreach activities whether on or off of our campus.
- 1.4 A small number of departments will have supplementary Safeguarding procedures which are departmental specific in order to meet regulatory requirements that do not apply to the University as a whole. This includes, but is not limited to, the Faculty of Education, the Faculty of Medicine and the Counselling Service.
- 1.5 Where University-led activity is hosted by another organisation within their own facilities, the host organisation's Safeguarding policy and related procedures will normally take precedence. However, University members should remain mindful of their obligations under this Safeguarding policy. Where a university student is on a placement or not physically present on campus, they will be subject to the localised Safeguarding policies and not the University Safeguarding policy. E.g., where the student is placed in a school environment, they will be subject to the school's Safeguarding policy.
- 1.6 The University is a mainly adult, independent learning environment. It cannot act "in loco parentis" and the ultimate responsibility for students under the age of 18 rests with those who have parental responsibility. Any parent, guardian, school or group responsible for the safeguarding of children, young people and vulnerable adults brought onto university premises, are responsible for them during the duration of their visit. The University does not accept responsibility for ensuring the safeguarding of children, young persons or vulnerable adults who are present on university premises without its knowledge or consent and who are not enrolled as students.

2. Legislative context

- 2.1 The policy is informed by a collection of legislation and guidance, including:
 - [Care Act 2014](#)
 - [Children Act 1989](#)
 - [Counter-Terrorism and Security Act 2015](#)
 - [Data Protection Act 2018](#)
 - [Equality Act 2010](#)



- [Health and Safety at Work Act 1974](#)
- [Managing Allegations about adults working with Children & Young People \(buckssafeguarding.org.uk\)](#)
- [OfS Safeguarding Students findings](#)
- [Prevent duty](#) (introduced as part of the Counter Terrorism and Security Act 2015)
- [Protection of Freedoms Act 2012](#)
- [Sexual Offences Act 2003](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Safeguarding Policy: Protecting Vulnerable Adults 2017](#)
- [Working together to safeguard Children 2018](#)

2.2 This policy also takes into consideration and is in compliance with the following university policies and/or procedures:

- [Access and widening participation statement](#)
- [Data protection policy](#)
- [Dignity at work & study policy & procedures](#)
- [Equal opportunities statement](#)
- [Equality and diversity policy](#)
- [Health, safety and wellbeing policy and procedures](#)
- [University mental health policy](#)
- [Prevent](#)
- [Staff and student relationships policy](#)

3. Policy statement

3.1 The University aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children, young people and vulnerable adults with whom the University's work brings it into contact.

3.2 Safeguarding is everyone's responsibility, as all individuals, including children, young people and vulnerable adults, have a right to be protected from harm, abuse and neglect. However, the University recognises that it is not the responsibility of all staff, students or visitors to investigate or establish if there is a safeguarding concern. Concerns should be raised under the University procedures to enable trained staff to be involved.

3.3 The University's approach to safeguarding will be person-led and outcomes-focused, which means engaging individuals in how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. In this approach the University is mindful that adults with capacity (as defined by the Mental Health Capacity Act 2005) have the right to self-determination, including the right to make unwise decisions and/or not to engage with support.

3.4 In developing the safeguarding procedures, the University commits to ensuring:



- Staff, student and visitors are made aware of the University's safeguarding policy, procedure and expectations.
- Staff safeguarding roles are established with clear responsibilities for the prevention and management of allegations or concerns.
- Appropriate initial and refresher safeguarding training is provided for staff and students.
- Consistent good safeguarding practice is embedded throughout the University, through safe recruitment practices and risk assessments with associated internal controls being in place for activities involving children, young people and/or vulnerable adults.
- Students and staff who might be at risk of radicalisation or exploitation have appropriate support in place.
- The process enables a consistent, appropriate and sensitive response to the reporting and handling of allegations or concerns
- Where safeguarding referrals are made to relevant statutory authority such as Local Authority Designated Officer (LADO) these will be proportionate and made on the basis of consideration of the identified risks, including consideration of the impact of the referral on those involved and the support available for all parties.
- Appropriate support is provided to staff and students involved with a safeguarding concerns, investigations, or referrals (reporter and accused). Where safeguarding referrals are made to relevant statutory authority such as LADO, support may also be provided by the statutory authority.
- Reviews are conducted post incidents in order to improve internal controls.
- Adequate records are maintained, and information shared appropriately and in line with the University GDPR policy; taking into consideration that confidentiality cannot be guaranteed as information may need to be shared; but that confidential information will only be shared minimally or as required, where this is considered to be necessary and will only be shared with relevant third parties on a need-to-know basis.

3.5 Non-permanent staff such as Visiting Lecturers and volunteers, may be eligible to use an abridged safeguarding training procedure and not complete the training provided by the University.

To be eligible for the abridged safeguarding training route, non-permanent staff must have successfully completed initial and/or refresher safeguarding training in a Higher Education, Further Education or Secondary School establishment within the last three years and have documentation to prove this.

They must complete the Abridged Safeguarding Training Form in Appendix A, attaching their proof of training to the completed form and submit this to HR.



4. Responsibility

- 4.1 The University has identified clear leadership and lines of accountability to ensure the full implementation of this policy across the University. Contact details of named individuals are available in Annex B of the procedure.

All staff

- 4.2 All staff have a responsibility to ensure the safety and welfare of children, young people and adults at risk with whom the University's work brings them into contact with. Therefore, all staff are responsible for:
- Ensuring they are aware of Safeguarding policy and procedure, and understand the standards expected of them and their responsibilities:
 - Taking appropriate steps as outlined in this policy and procedure to ensure that suspicions and allegations about safety and welfare are taken seriously and responded to swiftly and appropriately.
 - Undertaking mandatory safeguarding training provided by the University or suitable external providers for non-permanent staff, with refresher training completed every three years.
 - Where applicable, taking all appropriate steps during the recruitment and admissions process to ensure individuals are made aware of the Safeguarding policy and procedure and understand the mechanisms in place to report suspicions or allegations of abuse in relation to safeguarding.
 - Where applicable, receiving assurance from any contractors or contractor's employer that all necessary employment and safeguarding suitability checks have been completed by the contractor or contractor's employer.

University Designated Safeguarding Leads (DSL)

- 4.3 The University DSLs are the Registrar and the Head of Student Services (deputising in the Registrar's absence). They are responsible for:
- Taking the lead on the University's strategic approach to safeguarding.
 - Developing and overseeing the University's policies, procedures and systems to ensure activities comply with current legislation and that the University meets its safeguarding responsibilities.
 - Overseeing reviews and updates of policy to ensure consistent implementation of the procedure throughout the University.
 - Overseeing the work carried out by DDSLs.
 - Considering allegations or suspicions of concerns involving any DDSLs.
 - Reporting safeguarding information to the Compliance and Risk Group, which will support the DSL in monitoring the effectiveness of the Safeguarding policy and process.
 - Undertaking all required training with refresher training completed every two years, and updating their knowledge and skills to keep up to date with relevant developments.



University Designated Deputy Safeguarding Officers (DDSL)

4.4 The University Designated Deputy Safeguarding Officers (DDSLs) are the Head of Student Services (for all students), the Apprenticeships Manager (for apprenticeship students), Dean of FEDU (for education students) and the Director of Human Resources (for staff). Within their remit, they are responsible for:

- Acting as operational leads for safeguarding, with oversight of the implementation and review of this policy and procedure, ensuring compliance with evolving regulatory requirements and best practice guidance, in collaboration with other DDSLs and relevant University staff (e.g., the Health and Safety Manager).
- Overseeing safeguarding concerns across the institution, determining when to refer issues to the Designated Safeguarding Lead (DSL) and recommending appropriate action, including referrals to external authorities where necessary.
- Maintaining and sharing records of students or staff who are under 18 or identified as vulnerable adults with DSLs and other key University staff, such as the Accommodation Manager.
- Chairing and/or attending the Buckingham Joint Safeguarding Committee to facilitate collaboration and information sharing among local partners including the council, police, schools, and the University. Chairing responsibilities will be agreed among DDSLs.
- Establishing and maintaining relationships with relevant local authority departments and education institutions, including the Local Authority Designated Officer (LADO). Leads for these relationships will be assigned among the DDSLs.
- Serving as the main point of contact for communication with external safeguarding agencies.
- Maintaining effective GDPR-compliant reporting and recording systems.
- Promoting safeguarding awareness across the University by disseminating policies and providing advice and guidance to staff on related concerns.
- Maintaining the list of University Designated Safeguarding Officers (DSOs).
- Ensuring that any student or staff member involved in a safeguarding concern or investigation receives appropriate support—students through Wellbeing, Skills and Diversity, and staff through the Employee Assistance Programme.
- Completing all required safeguarding training, including refresher training every two years, and keeping knowledge and skills up to date.

(University Designated Safeguarding Officers (DSO))

4.5 The DSO are appointed within each Faculty and/or department and are responsible for:

- Providing first line support and advice on safeguarding issues.
- Highlighting and promoting best practice relating to safeguarding within their department.
- Referring all allegations, concerns or incidents within their respective department to the relevant DDSL.
- Undertaking all required training with refresher training completed every two years and updating their knowledge and skills to keep up to date with relevant developments.

Dean of Faculty/ Associate Dean/ Head of Department

4.6 Whilst the DSO will oversee safeguarding within their area, the Dean of Faculty, Associate Dean or Head of Department are responsible for:



- Ensuring sufficient resources are available to deliver safeguarding commitments within their faculty/ department.
- Raising awareness of the DSO role in the faculty/ department to ensure any safeguarding concerns are reported promptly to the DSO.
- Advising on the admission of under-18 students and vulnerable adults, in conjunction with the DDSL and the relevant Faculty nominee, for example requirements of DBS checks for staff teaching those students.
- Consulting with DDSL (Director of Human Resources) on the employment of any staff under the age of 18 or any staff who may be classed as a vulnerable adult.
- Overseeing the welfare of under-18 students/staff and vulnerable adults within their faculty/ department. The responsibility of monitoring may be devolved as appropriate and made known to staff and students, however the Dean/Associate Dean/Head of Department should still retain oversight.
- Ensuring all appropriate risk assessments are undertaken for relevant activities within their faculty/ department in conjunction with the Health and Safety Manager.

The University Compliance and Safeguarding Group:

4.7 Is responsible for:

- Overseeing the development, implementation and monitoring of systems, processes and policies relating to safeguarding children, young people and vulnerable adults.
- Ensuring relevant policies and procedures up to date, taking account of changes in legislation, and reviewing and auditing practice as appropriate.
- Reviewing best practice in the higher education sector as a whole and guidance issues by the Government and other agencies.
- Monitoring and overseeing matters relating to the safeguarding and protection of children, young people and vulnerable adults and persons vulnerable to radicalisation.
- Developing and implementing clear strategies in respect of safeguarding and protecting, and that they are coordinated and implemented consistently across the Institution, in a way which anticipates and responds to external and internal developments and ensures that the Institution can be accountable for safeguarding and protecting children, young people and vulnerable adults.
- Reviewing safeguarding concerns and ensuring a clear organisation focus on risk management, that appropriate and proportionate action is taken, and any learning is shared from matters arising.
- Preparing an Annual Report to the University Council and Senate on issues relating to safeguarding and changes in legislation.

5 Definitions

Adult at Risk

Someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing, or is at risk of neglect or physical, mental or emotional harm; and (iii) as a result of those needs, is unable to protect



	themselves against neglect, harm or the risk of it (based on Data Protection Act 2018).
<i>Age of consent in the UK</i>	A person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the Sexual Offences Act 2003 for an adult in a position of trust to engage in sexual activity with a person under the age of 18. Staff employed by the University are in a position of trust when working with children and young people
<i>Apprentice</i>	All students who are registered on one of the University's apprenticeship programmes.
<i>Child/Children</i>	Anyone under the age of 18 years.
<i>Disclosure and Barring Service (DBS)</i>	Statutory body which carries out DBS checks (previously known as a criminal record or CRB check). Such checks contain details of both spent and unspent convictions, cautions, reprimands and warnings that are held on the Police National Computer, which are not subject to filtering.
<i>Extremism</i>	Refers to views held which are intolerant of people who are of a different ethnicity, culture, religion, gender or political or sexual identity. Extremists may try to force their views on others and in some cases, may believe that these views can justify the use of violence in order to achieve certain aims.
<i>Member of the University</i>	Includes staff, students and alumni of the University
<i>Prevent</i>	Anti-terrorism strategy which aims to reduce the threat of terrorism in the UK (part of the government's anti-terrorism strategy as set out in Counter-Terrorism and Security Act 2015).
<i>Radicalisation</i>	The action or process of causing someone to adopt radical positions on political or social issues.
<i>Safeguarding</i>	Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially adults at risk and children, from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across all activities associated with the University. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and protect those accused until a decision is made
<i>Staff</i>	All paid University staff whether working on a permanent or temporary contract, apprentices, or engaged as "third party contract staff" working directly for the University.



<i>Student</i>	All students registered with the University, including those based in partner organisations who are registered with the University to gain a professional qualification and third-party apprentices for whom we provide training.
<i>Terrorism</i>	An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat is designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
<i>Volunteer</i>	Include members of the University or other associated persons leading or supporting University-led activities for which they are not paid.
<i>Vulnerable Adults</i>	<p>Persons aged over 18 who are or may be in need of community care services by reason of mental or other disability, age or illness; and who are or may be unable to take care of/ or unable to protect themselves against significant harm, abuse, exploitation or from radicalisation. (Based on section 59, Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012).</p> <p>Adults as described above may not necessarily be at risk all of the time or at all. The risk however arises if they are not able to protect themselves against significant harm, abuse, exploitation or from radicalisation and being drawn into extremist ideologies.</p>
<i>Work with children or Adults at Risk</i>	Includes all engagement with children and adults at risk whether in a professional capacity in connection with the work of the University, or in the course of other University-led activities supported by members of the University whether working in a paid or unpaid capacity
<i>Young person/people</i>	In this policy we also use the term 'young person' or 'young people' to refer to children aged 16 or 18 years old.



Appendix A - Abridged Safeguarding Training Form

Name: _____

School / Department: _____

Name of organisation where you completed your safeguarding training?

Date of training: _____

Proof of training attached (screenshot/pdf etc) Yes No

If no proof of training can be provided, you will be required to take the training provided by the University.

I confirm that I have read and agree to abide by these documents:

The University of Buckingham Safeguarding Policy

The University of Buckingham Safeguarding Procedure

I am also aware of who are the relevant Designated Safeguarding Leads, Designated Safeguarding Officers and Nominated Safeguarding Officers.

Signed: _____

Date: _____