

# Safeguarding Procedure

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

<b>Procedure owner:</b>	Head of Student Services
<b>Implementation date:</b>	March 2024
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<b>Related policies:</b>	Safeguarding Policy Substance Misuse policy
<b>Related procedures:</b>	Safeguarding Procedure Student in Crisis Procedure Student Death Procedure

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## 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

## Safeguarding Procedure

V5	Registrar & Chief Administrative Officer and Head of Student Services	Amendment of staff roles and names due to staff changes.	21/07/25
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### 1. Purpose

This procedure is underpinned by the six statutory safeguarding principles (Care Act 2014): Empowerment, Prevention, Proportionality, Protection, Partnership, and Accountability.

- 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 procedure sets out how the University implements its Safeguarding policy which ensures the University undertakes its statutory responsibilities in this regard.

### 2. Scope

- 2.1 This procedure applies to all members of the University including staff, students, contractors and volunteers (irrespective of whether they act in a paid or unpaid capacity), 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.
- 2.2 This does not apply to University led activity which is hosted by another organisation within their own facilities, or university students on a placement or not physically present on campus. In these instances, the individuals will be subject to the localised safeguarding policies and procedures. However, University members should always remain mindful of their obligations under this safeguarding policy.

### 3. Immediate Concern

- 3.1.1 If you have a suspicion or are aware that a child, young person and or adults at risk is being abused, you must act quickly, appropriately and professionally.
- 3.1.2 **Where there is perceived to be an immediate threat to life or of serious harm, the issue should be reported to the Emergency Services on 999.** University Security and the University Designated Safeguarding Lead (DSL)/ Deputy Designated Safeguarding Leads (DDSLs) should be notified immediately after the report has been made.
- 3.1.3 A list of key safeguarding contacts is available in Annex B. Anyone on this list can be contacted for advice and guidance.

### 4. Managing a Safeguarding Concern

#### 4.1 Identifying a concern

- 4.1.1 Concerns for the safety and wellbeing of children, young people and adults at risk, could arise in a variety of ways and in a range of different settings, some examples include:

#### *Abuse, harm or mistreatment*

- Unexplained changes in behaviour or personality.
- Becoming quiet and withdrawn.
- Being aggressive or angry for no obvious reason.

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- Sudden changes in their character such as appearing helpless, depressed or tearful.
- Being unusually light-hearted and insisting there's nothing wrong.
- Physical signs such as bruises, wounds fractures or other untreated injuries.
- The same injuries happening more than once.
- Change to clothing styles which cover the body.
- Not wanting to be left by themselves alone or with particular people.
- Change in behaviour of friends or colleagues becoming more coercive, controlling or threatening around the individual.

### *Suicide*

- Talking about suicide, for example, making statements such as "I'm going to kill myself," "I wish I were dead", "I wish I hadn't been born" or "no one would miss me if I wasn't here".
- Being preoccupied with death, dying or violence.
- Getting the means to take their own life, such as stockpiling pills.
- Changing normal routine, including eating or sleeping patterns.
- Withdrawing from social contact and wanting to be left alone.
- Having mood swings, such as being emotionally high one day and deeply discouraged the next.
- Feeling trapped or hopeless about a situation.
- Doing risky or self-destructive things, such as using drugs or driving recklessly.
- Increasing use of alcohol or drugs.
- Giving away belongings or getting affairs in order when there is no other logical explanation for doing this.
- Saying goodbye to people as if they won't be seen again.
- Developing personality changes or being severely anxious or agitated, particularly when experiencing some of the warning signs listed above.

### *Radicalisation*

- The adoption of inappropriate language.
- Possession of violent and /or extremist literature.
- Open expression of extremist views.
- Reduced contact with peers, in preference to contact with members of a particular ideological or extremist group.
- A change to their habitual style of dress.
- An individual may advocate or condone violence in support of their espoused ideology.

4.1.2 There may be many reasons for such changes which is why a safeguarding approach should always be adopted. Advice and guidance can be sought from one of the designated safeguarding contacts within the University (Annex B) who will listen

to any concerns in a safe and supportive fashion, with no assumptions made on the basis of information received.

### 4.2 Making a referral

4.2.1 If a child, young person or adult at risk tells a member of the University about possible abuse, harm, mistreatment, suicidal thoughts or radicalisation and/or if a member of the University has concerns that a child, young person or adult at risk is at risk of possible abuse, harm, mistreatment, suicide or radicalisation that individual is encouraged to:

- Stay calm, listen carefully, and make sure they have understood what is being discussed with them by clarifying points where necessary.
- Reassure the individual that by reaching out they have done the right thing.
- Make careful records of what is said, where possible using the same language as the individual, take particular note of names, times, dates, etc, together with any injuries observed (the form in Annex C can be used to capture this information).
- Advise the individual that this information must be passed on but that it will only be shared with those that need to know such as the University Safeguarding lead(s).
- Report the conversation immediately to the DSO/DDSL (Annex B).

Individuals are encouraged not to:

- Give their opinion or attempt to assess themselves whether or not the allegations are true.
- Attempt to deal with any suspicion or report of abuse themselves.
- Report concerns about an individual directly to external agencies or authorities themselves other than in consultation with the relevant DDSL.

4.2.2 A report can be made directly to the Head of Student Services, DDSL for students and the Director of Human Resources DDSL for staff. Where the allegation or suspicion involves the Head of Student Services this should be reported to the Registrar, where the allegation of suspicion involves the Director of Human Resources, this should be reported to the Registrar. When making a report it is helpful to take note of the issues which have led to the concern prior to reporting them (the form in Annex C can be used to capture this information<sup>1</sup>).

4.2.3 Once a concern has been reported, relevant trained staff will take a risk-based approach and are likely to discuss concerns with the identified individual and, where necessary, services outside the University. For this reason, individuals should not report concerns about a child, young person or adult at risk directly to external agencies or authorities themselves other than in consultation with a DDSL.

### 4.3 Managing a referral

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<sup>1</sup> Further guidance on (i) supporting students identifying as vulnerable due to mental health difficulties can be found within the University Mental Health policy (ii) referring concerns relating to radicalisation can be found in the University Prevent Policy.

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- 4.3.1 Once a report or suspicion of a concern has been made an investigation will be commenced by a DDSL. This will focus on ensuring referrals are investigated thoroughly, fairly and to allow appropriate interventions to be developed if required, all the while with a focus on safeguarding the individual about whom concerns have been expressed. Precautionary measures may be put in place at any stage of the referral management process (see section 4.4).
- 4.3.2 The DDSL will first establish that the person identified as having a safeguarding concern meets the definition of child, young person or adult at risk. If these definitions are not met but the person identified requires support, they will be referred to the appropriate internal or external services. The Safeguarding Record Form (Annex D), will be filled out to capture a record of the decision making process.
- 4.3.3 The DDSL will then take appropriate steps which could include one or more of the following:
- Consult with relevant colleagues to ensure all relevant facts have been gathered.
  - Undertake a risk assessment<sup>2</sup>.
  - Liaise with appropriate external partners e.g., appropriate staff in a school within which outreach activities are happening, a placement provider, an apprenticeship student's employer etc.
  - report the suspicion or allegation to the appropriate emergency or local authority services (e.g. LADO).
  - Make a referral to the Disclosure and Barring Service (DBS) where the legal duty to refer is met — that is, when:
    - An individual has been removed (or would have been removed had they not resigned) from regulated activity; and
    - They have engaged in relevant conduct or the harm test is satisfied (i.e., there is a risk of harm to a child or adult at risk).
  - provide or arrange for appropriate support to be put in place via internal or external services. for the individual referred and the individual against whom the allegation has been made;
  - Update the person who originally reported the allegation as to what action has been taken.
- 4.3.4 Where an allegation of abuse is received by the University from an external source concerning a University member, the DDSL will normally consult with the appropriate external agency or authority.
- 4.3.5 In managing safeguarding concerns or allegations, the University has a duty of care both to the child, young person, adult at risk or staff member concerned and to the individual against whom the allegation is made. Students in these circumstances should seek advice and support from the Wellbeing, Skills and Diversity department, whilst staff can seek advice and support through the Employee Assistance Programme.

## 4.4 Precautionary measures

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<sup>2</sup> Support and guidance can be provided by the University Health and Safety Manager

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- 4.4.1 A student who is subject to consideration under the Safeguarding Procedure may be subject to precautionary measures that will remain in place during the procedure including, if applicable, any subsequent appeals.
- 4.4.2 Precautionary measures are a neutral act in the context of the eventual determination of whether a Safeguarding concern is found to be proven or not proven. They are applied when there is a risk identified to a member(s) of the University community within the scope of this policy. Its purpose will be to protect the student, members of the public and colleagues and will always be proportionate.
- 4.4.3 Precautionary measures may include a range of action, including:
- Change of accommodation
  - No contact arrangements with named individuals.
  - Whole or partial exclusion from entering all or specific University premises.
  - Move to remote learning.
  - Withdrawal of access to IT facilities.
  - Suspension from study for a defined period of time.
- 4.4.4 Precautionary measure will be made based on risk to the referred student, other students, staff, or the University or other identified people and/or organisations. The DSL can impose precautionary measures under this section. However, in line with University policy only the Registrar can impose a suspension of studies.
- 4.4.5 The student will be notified in writing of any requirements of them, this will be copied to the Wellbeing, Skills and Diversity team.
- 4.4.6 In cases deemed to be urgent, particularly if the safety or welfare of others is perceived to be at risk, such actions may be imposed with immediate effect, and before the student is given the opportunity to have engaged with the Safeguarding procedures. In this instance, the student shall be permitted to put forward representations at the earliest possible opportunity thereafter.
- 4.4.7 A student wishing to instigate a review of any precautionary measures due to significantly altered circumstances can do so at any point during the period the action is imposed via a written request submitted to the DDSL (Head of Student Services). Such a request should provide appropriate supporting evidence of relevant significantly altered circumstances.
- 4.4.8 A student wishing to review a precautionary measure should write to the DSL who imposed the measure. Such a request should provide appropriate supporting evidence as to why the precautionary measure was objectively unreasonable. For precautionary measure up to suspension, this will then be considered by the alternate DSL, for a precautionary suspension this will be considered by the PVC Academic.
- 4.5 Record keeping
- 4.5.1 Accurate, timely recording, retention and storage of safeguarding concerns is key to providing an integrated, cohesive response to tackling allegations, suspicions or

concerns. Records will therefore be kept of all safeguarding concerns, incidents and their outcomes by the relevant DDSL. All records will be:

- Factual information, with any interpretation or inference drawn from what was observed, said or alleged being clearly recorded as such.
- Comprehensive and contain all relevant details, regardless of whether or not the concerns are shared with the police.
- Kept confidential with information only shared on a need to know basis. Managed as though they may later be used in formal/legal proceedings.
- Kept for the length of time necessary to perform the processing for which it was collected.
- Disposed of securely, with paper records shredded or disposed of in confidential waste and electronic records permanently deleted, once a record is no longer needed.

4.5.2 It should be noted that whilst mechanisms are in place to verify false allegations, the University is unable to eradicate such allegations entirely, given the responsibility to record and retain all allegations or suspicions of abuse involving staff or students in line with safeguarding retention periods.

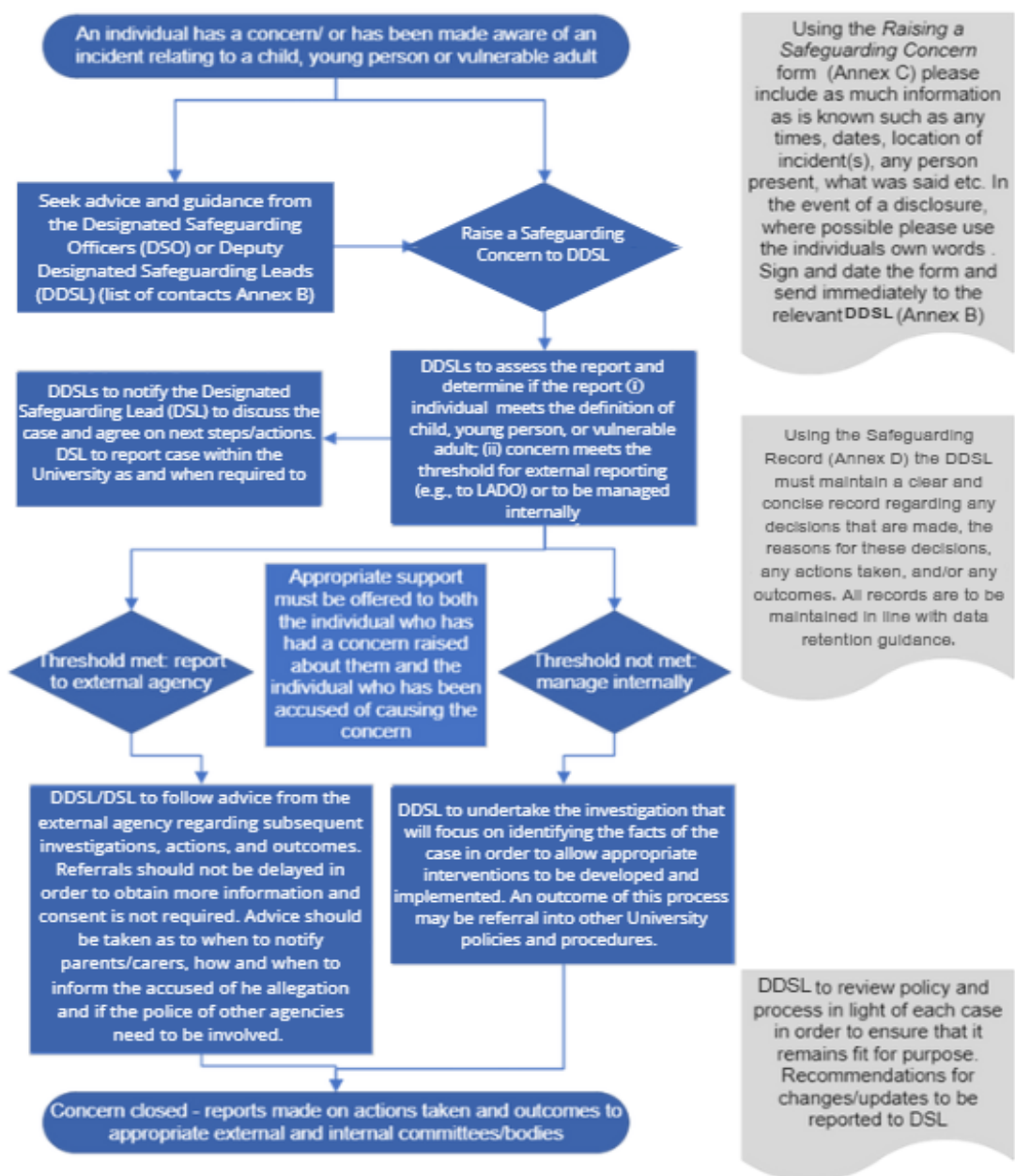
### **5. Activities involving, children, young people, and/or adults at risk.**

- 5.1 All staff that intend to or may be put in the position of working with children, young people or adult at risk, should ensure that they take all reasonable steps to manage the risk associated before commencing any work, event, visit or other activity.
- 5.2 Depending on the work, event, visit or other activity a risk assessment may need to be undertaken. Support and guidance in carrying out a risk assessment is available from the University Health and Safety Manager.
- 5.3 All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

# Safeguarding Procedure

## Annex A

University of Buckingham - Managing a Safeguarding Concern



## Annex B: University Safeguarding Contacts

### Designated Safeguarding Officers (DSOs)

A Designated Safeguarding Officer is a trained member of staff appointed to act as a first point of contact for safeguarding concerns within their designated area of responsibility (e.g., a school, faculty, department, or service).

Area	Contact	Contact email
Foundation students	Subhi Ashour, Programme Director, Centre for Foundation Studies	<a href="mailto:subhi.ashour@buckingham.ac.uk">subhi.ashour@buckingham.ac.uk</a>
Business, Humanities and Social Sciences students	Elaine Chambers, FBHS Faculty Registrar	<a href="mailto:elaine.chambers@buckingham.ac.uk">elaine.chambers@buckingham.ac.uk</a>
	Eleanor Wilkins, FBHS Faculty Mentor	<a href="mailto:eleanor.wilkins@buckingham.ac.uk">eleanor.wilkins@buckingham.ac.uk</a>
Computing, Law and Psychology students	Barny Lord, FCLP Faculty Registrar	<a href="mailto:Barny.lord@buckingham.ac.uk">Barny.lord@buckingham.ac.uk</a>
	Cara Stubbings, Faculty Mentor	<a href="mailto:cara.stubbings@buckingham.ac.uk">cara.stubbings@buckingham.ac.uk</a>
Medicine and Health Science students	Emma Spikings, Student Support Lead	<a href="mailto:emma.spikings@buckingham.ac.uk">emma.spikings@buckingham.ac.uk</a>
	Nikki Dean, Student Support Manager	<a href="mailto:nikki.dean@buckingham.ac.uk">nikki.dean@buckingham.ac.uk</a>
Education students	Shonali Mathur, FEDU Faculty Registrar	<a href="mailto:shonali.mathur@buckingham.ac.uk">shonali.mathur@buckingham.ac.uk</a>
Accommodation, Buckingham	Lisa Cross, Accommodation Manager	<a href="mailto:Lisa.cross@buckingham.ac.uk">Lisa.cross@buckingham.ac.uk</a>
Activities within the Students' Union	Sarah Ruff, SU Manager and Sports Coordinator	<a href="mailto:Sarah.ruff@buckingham.ac.uk">Sarah.ruff@buckingham.ac.uk</a>
All students	Karen Webb, Deputy Head of Wellbeing, Skills and Diversity	<a href="mailto:karen.webb@buckingham.ac.uk">karen.webb@buckingham.ac.uk</a>
All staff	Head of Department	

To report an allegation or suspicion of abuse on campus out of hours, please contact the relevant Campus Security Services on **07860 834 802** (Buckingham Campus) or **01270 353 200** (Crewe Campus).

### Deputy Designated Safeguarding Leads (DDSLs)

They are operational leads for implementing the Safeguarding procedure and will take on cases escalated from DSOs and/or directly from staff and students. They are able to respond directly to incidents, provide in-depth advice and guidance to DSOs and/or staff and students.

Students	Laura Whitty, Head of Student Services	<a href="mailto:Laura.whitty@buckingham.ac.uk">Laura.whitty@buckingham.ac.uk</a>
Staff	Diane Jackson-Gould, Director of Human Resources	<a href="mailto:diane.jackson-gould@buckingham.ac.uk">diane.jackson-gould@buckingham.ac.uk</a>
Apprenticeships	Emma Ward, Apprenticeships Manager	<a href="mailto:emma.ward@buckingham.ac.uk">emma.ward@buckingham.ac.uk</a>
Education Students	Barnaby Lenon, Dean of FEDU	<a href="mailto:Barnaby.lenon@buckingham.ac.uk">Barnaby.lenon@buckingham.ac.uk</a>

### Designated Safeguarding Leads (DSLs)

The strategic leads responsible for ensuring that the University meets its Safeguarding responsibilities. They are able to respond directly to serious incidents and provide advice or guidance to DSOs and/or staff and students.

Area	Contact	Contact email
Students and Staff	Chris Payne, Registrar	<a href="mailto:chris.payne@buckingham.ac.uk">chris.payne@buckingham.ac.uk</a>
Students	Laura Whitty, Head of Student Services (to deputise in the Registrar's absence)	<a href="mailto:Laura.whitty@buckingham.ac.uk">Laura.whitty@buckingham.ac.uk</a>

- The Director of Human Resources also has oversight of all staff employed at the University who are under 18 or/and identifying as an adult at risk and is responsible for coordinating and monitoring relevant Safeguarding training for staff.
- The Head of Student Services has oversight of students enrolled at the University who are under 18 or/and identifying as an adult at risk.

Reference:	(year, month, student initials – type (C, YP or VA) e.g. 2311AS-VA]
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## Annex C:

### Raising a Safeguarding Concern

SECTION 1 – Details of the individual raising a concern			
Title (Ms, Mr, Miss etc.)			
First name			
Family name			
University relationship (please tick as appropriate)	<input type="checkbox"/> Staff	<input type="checkbox"/> Student	<input type="checkbox"/> Other (please state)
Department/Faculty			
Contact details	Email:		
	Mobile:		

SECTION 2 – Details about the child, young person or adult at risk			
They are (please tick as appropriate)	<input type="checkbox"/> child	<input type="checkbox"/> young person	<input type="checkbox"/> adult at risk
Title (Ms, Mr, Miss etc.)			
First name			
Family name			
University relationship (please tick as appropriate)	<input type="checkbox"/> Staff	<input type="checkbox"/> Student	<input type="checkbox"/> Other (please state)
Department/Faculty			
Contact details			

SECTION 3: Details of the concern(s)	
Date concern was noted	
Location	
Who was present? (please list names(s))	
What is the concern?  <i>Please give as much information about the concern as you are able including who may be involved and in what capacity.</i>	

Reference:	(year, month, student initials – type (C, YP or VA) e.g. 2311AS-VA]
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#### SECTION 4: Declaration

I understand that by submitting this form relevant trained staff within the University will undertake risk assessments and are likely to discuss concerns with the identified individual, and where necessary, may report these concerns to external agencies in line with the University Safeguarding Policy, and legal requirements regarding the Safeguarding of children, young people and/or adults at risk.

Signed:			
Date:		Time	

**Please submit this form to**

- Student related incident: [laura.whitty@buckingham.ac.uk](mailto:laura.whitty@buckingham.ac.uk)
- Staff related incident: [diane.jackson-gould@buckingham.ac.uk](mailto:diane.jackson-gould@buckingham.ac.uk)

Office use	
Date received	
Reference	[year, month, student initials – type (C, YP, VA) e.g. 2311AS-VA]

Reference:	(year, month, student initials – type (C, YP or VA) e.g. 2311AS-VA]
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## Annex D:

### Safeguarding Record

SECTION 1 – Details about the child, young person and/or adult at risk			
Are they (please tick as appropriate)	<input type="checkbox"/> child	<input type="checkbox"/> young person	<input type="checkbox"/> adult at risk
Title (Ms, Mr, Miss, Dr etc.)			
First name			
Family name			
Relationship with University (please tick as appropriate)	<input type="checkbox"/> Staff	<input type="checkbox"/> Student	<input type="checkbox"/> Staff and Student
Contact details	Email:		
	Mobile:		

SECTION 2 – Details of the reporter			
Who made the report:			
Relationship with University (please tick as appropriate)	<input type="checkbox"/> Staff	<input type="checkbox"/> Student	<input type="checkbox"/> Other (please state)
Date and time of report:			
Contact details	Email:		
	Mobile:		

SECTION 3 – Initial assessment of Safeguarding concern		
Summary of concern:		
External reporting threshold met?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Explanation:	

SECTION 4 – Details of who has been contacted		
Who has been contacted (please tick and date as appropriate)	<input type="checkbox"/> DSL <input type="checkbox"/> DSO	Date:
	<input type="checkbox"/> Parents/carers	Date:

Reference:	(year, month, student initials – type (C, YP or VA) e.g. 2311AS-VA]
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	<input type="checkbox"/> Head of Faculty/ Associate Dean/ Line Manager	Date:
	<input type="checkbox"/> Local Authority Designated Officer	Date:
	<input type="checkbox"/> Police	Date:
	<input type="checkbox"/> Social Services	Date:
Summary of contact made and why		

SECTION 5 – Summary of action taken			
Action taken:			
Date and time:		Initials	
Action taken:			
Date and time:		Initials	
Action taken:			
Date and time:		Initials	
Action taken:			
Date and time:		Initials	

*Please add more as required*

Signed:			
Position			
Date:		Time	

Note: all information collated as part of a Safeguarding concern being raised and/or investigated will be maintained and kept by either Head of student Services (student related) or the Director of Human Resources (staff related), in compliance with the retention and storage of safeguarding records guidelines.

## **Annexe E:**

Guidelines on dealing with suspicions or allegations of abuse in relation to safeguarding

### **1. Introduction**

1.1 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 adults at risk with whom the University's work brings it into contact.

1.2 Whilst there is no legislation in the area of safeguarding directed specifically at Higher Education Institutions (HEIs), the University is mindful of its duty of care and legal obligations such as those it owes under the Health and Safety at Work Act 1974, the Children Act 1989, the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, Working together to safeguard Children 2018, the IHRA's working definitions and charters and the Prevent duty (introduced as part of the Counter Terrorism and Security Act 2015), which places a legal obligation on the University to protect members of its community from radicalisation and being drawn into extremist ideologies

1.3 The University Safeguarding policy applies to all members of the University. However, it is specifically aimed at staff, students, contractors and volunteers who encounter the following groups through teaching, research, professional services and outreach activities whether on or off of our campus:

- **children** (i.e. those aged under 16),
- **young persons** (i.e. those aged 16 to 18), and
- **adults at risk** (i.e. persons aged 18 or over 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.

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.

### **2. Aim**

2.1 The guidance provided within this document is intended to highlight the areas which form the basis of the University's approach to dealing with suspicions or allegations of abuse in relation to safeguarding, and to direct staff, students and volunteers to appropriate guidance.

2.2 The guidance provided within this document forms part of the University Safeguarding policy, sections 3,4 and 5.

### **3. Definitions of Abuse**

3.1 Abuse under the policy on safeguarding includes:

- **Physical abuse**, including hitting, slapping, pushing, kicking, or inappropriate sanctions;

•**Sexual abuse**, including encouraging relevant individuals to look at pornography, harassing them by making sexual suggestions or comments, or sexual acts where the individual has not consented, or could not consent or was pressured into consenting;

•**Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, radicalisation, verbal abuse, isolation or withdrawal from services or supportive networks;

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

•**Financial or material abuse**, 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;

•**Discriminatory abuse**, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

#### 4. Detecting abuse

4.1 Any member of the University (student or staff member) may raise concerns about a child, young person or adult at risk being open to abuse, based on information received or behaviour observed.

4.2 There are a number of ways in which suspicions of abuse may be raised or actual abuse brought to your attention:

•A child, young person and or adult at risk may confide in you that they are being abused;

•A child, young person and or adult at risk may display signs of physical abuse;

•The behaviour of, or a change in the behaviour of a child, young person and or adult at risk may suggest that they are being abused;

•A colleague may report to you that a child, young person and or a adult at risk has confided in them that they are being abused;

•A colleague may report that they have a suspicion that a child, young person and adult at risk is being abused;

•The behaviour or a change in the behaviour of a colleague may suggest that they are abusing a child, young person and or adult at risk.

4.3 Behaviour which may raise suspicions of radicalisation or that a person may be being drawn into extremism or crime might include:

- The adoption of inappropriate language;
- Possession of violent and/or extremist literature;•Open expression of extremist views;
- Reduced contact with peers, in preference to contact with members of a particular ideological or extremist group;
- A change to their habitual style of dress;
- An individual may advocate or condone violence in support of their espoused ideology.

4.4 There may be many reasons why an individual may begin to exhibit changes as outlined above. This is why a safeguarding approach should be adopted. Such an approach enables relevant services within and outside the University to identify an individual's needs and vulnerabilities.

## 5. Dealing with a suspicion or awareness of abuse

5.1 If you have a suspicion or are aware that a child, young person and or adult at risk is being abused, you must act quickly, appropriately and professionally.

- Allegations or suspicions of abuse involving students should be reported to a Designated Safeguarding Officer DSO or DDSL (contacts in annex B) by completing the raising a safeguarding form (annex C)
- Allegations or suspicions of abuse involving staff who are under the age of 18 or adults at risk should be reported to the **Director of Human Resources**.
- Where the allegation or suspicion involves the Director of Human Resources, this should be reported to the **Registrar (or nominee)**.

5.2 It is important that such concerns can be shared in a safe and supportive fashion, with no assumptions made on the basis of information received, to ensure referrals are investigated thoroughly, fairly and to allow appropriate interventions to be developed if required.

5.3 Where a concern of abuse is shared, individuals are required to:

- Reassure the child, young person and or adult at risk and explain that you have a responsibility to share the information disclosed with a Designated Safeguarding Officer (DSO);
- Make careful records of what is said using the child, young person and or adult at risk's own words as soon as possible following the disclosure, complete the raising a safeguarding form (annex C), submit to a DSO/DSL (annex B)
- Date, time and sign the record. The record will be used in any subsequent legal proceedings.

Individuals are encouraged **NOT** to:

- Give their opinion or attempt to assess themselves whether or not the allegations are true.
- Attempt to deal with any suspicion or report of abuse themselves.
- Report concerns about an individual directly to external agencies or authorities themselves other than in consultation with the relevant DDSL.

5.4 Guidance on supporting students identifying as vulnerable due to mental health difficulties can be found within the University Mental Health policy.

5.5 Further guidance on the procedure for referring concerns relating to radicalisation can be found in the University Prevent Policy, section 11.

5.6 The DDSL (Deputy Designated Safeguarding Lead) (detailed in annex B) in their role may:

- Provide appropriate support for the child, young person and or adult at risk;
- Refer the student or staff member to an external support agency;
- Refer for consideration under alternative procedures such as Fitness to Study, if the incident involves a student;
- Report the suspicion or allegation to the appropriate emergency or local authority services;
- Report the suspicion or allegation to the Disclosure and Barring Service (DBS) under their legal duty to refer;
- Provide appropriate support for the person against whom the allegation has been made;
- Confirm to the person who originally reported the allegation that action has been taken.

5.7 Where an allegation of abuse is received by the University from an external source concerning a University member, the DDSL will normally consult with the appropriate external agency or authority.

5.8 The University will seek to approach all concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

5.9 Whilst mechanisms are in place to verify false allegations, the University is unable to eradicate such allegations entirely, given the responsibility to record and retain all allegations or suspicions of abuse involving staff or students in line with safeguarding retention periods.

## **6. Reporting suspicions or allegations of abuse**

6.1 Any suspicion or allegation of abuse should be reported immediately to the designated Safeguarding Officers (see section 5.1) by raising a safeguarding form (annex C).

6.2 To report an allegation or suspicion of abuse on campus out of hours, please contact the relevant Campus Security Services on **07860 834 802** (Buckingham Campus) or **01270 353 200** (Crewe Campus).

6.3 If any individual child or adult is perceived to be at serious risk of immediate harm off campus, the relevant emergency service should be contacted.

6.4 In an immediate emergency where the submission of the raising a safeguarding form is not immediately possible, it is important to give as much information about the allegation or suspicion, including if you suspect abuse, the name of the alleged abuser, and the circumstances which brought the alleged abuse to your attention.

6.5 Individuals should not report concerns about an individual directly to external agencies or authorities themselves, other than in consultation with a DDSL.

6.6 Only where there is clear and compelling evidence of a requirement to do so, will information be shared with other agencies.

## **7. Person against whom the allegations have been made**

7.1 The University has a duty to take all allegations or suspicions of abuse seriously and to take the appropriate action, including referral to the DBS.

7.2 Anyone against whom an allegation has been made may be suspended from their employment or studies whilst appropriate investigations are undertaken.

7.3 Before any student is invited to attend an investigation into an allegation or suspicion of abuse, the Student Conduct Manager will check whether the student is under 18 or is being supported by Wellbeing, Skills and Diversity.

7.4 If the student is receiving support, Wellbeing, Skills and Diversity will be asked for any further relevant information.

7.5 The student will be made aware of the right to be accompanied by a friend when attending any investigation.

7.6 Where the suspicions or allegations are made against a student, the Student Conduct Manager will consider whether it is appropriate to take action against the individual under the Non-academic Misconduct Policy and Disciplinary Procedures.

7.7 Where the suspicions or allegations are made against a member of staff, the Head of Human Resources will consider whether it is appropriate to take action against the individual under the Teacher, Student and Staff Relationships Policy.

7.8 Anyone alleged or suspected to be involved in the abuse of a child, young person and/or adult at risk will be notified in writing if any action is to be taken against them.

7.9 The University will, however extend its full support to the individual by ensuring that the lines of communication remain open, even where access to the University and its facilities is limited or prohibited.

7.10 If the DBS subsequently bars a person against whom an allegation has been made, the University will not be permitted to engage the individual in regulated activity.

## **8. Follow-up Procedures**

8.1 The DDSL will keep the relevant parties informed of action taken with respect to incidents reported, as appropriate, with the completion of Annex D

8.2 Where an individual has continued concerns for the safety and welfare of the child, young person and or adult at risk, this should be included in the Raising a Safeguarding Concern form (annex C), with an explanation of why the action taken to date is insufficient.

## **9. Data Protection**

9.1. Under the Data Protection Act 2018, individuals have a right of access to personal data that relates to them. This right of access may include a right to request access to records (in whole or in part), relating to suspicions or allegations of abuse involving the person making the request.

9.2. Under the UK General Data Protection Regulation (retained EU law) and the Data Protection Act 2018, there are restrictions that apply to the processing of personal information relating to children. Although the University does not generally process the data of children, there may be circumstances when it is necessary to do so.

9.3 If it is deemed necessary that a Faculty or department within the University is required to process the personal data of children, the Data Protection Officer should be consulted in the first instance, to ensure GDPR compliance.

9.4 If any staff member receives a request from a person for access to personal data (held either about that person or another individual) in relation to suspicions or allegations of abuse, the request should be forwarded to the appropriate DDSL (see annex B) for consultation with the Data Protection Officer.

9.5 Further information on the University Data Protection policy can be obtained via <https://www.buckingham.ac.uk/about/policies/data-protection>.

## **Annexe F**

### **Guidelines for recording, retaining, and storing safeguarding records and concerns**

#### **1. Aim**

1.1 The guidance provided within this document is intended to highlight the areas that form the basis of the University's approach to information handling, recording, retaining and storing records connected to suspicions or allegations of abuse in relation to safeguarding.

1.2 The guidance provided within this document forms part of the University Safeguarding policy, sections 3, 4 and 5.

#### **2. Responsibilities**

2.1 The University recognises that accurate, timely recording, retention and storage of safeguarding concerns is key to providing an integrated, cohesive response to tackling allegations, suspicions or concerns of abuse in relation to safeguarding.

2.2 The University will create records, share and store information in line with its obligations under the UK General Data Protection Regulation (retained EU law) and the Data Protection Act 2018 and Data Protection Act (DPA) 2018.

2.3 All members of the University have a responsibility to ensure that suspicions and allegations of abuse in relation to safeguarding children, young people and or adults at risk are reported in accordance with the University Safeguarding policy, sections 7 and 8.

2.4 Additional guidance for dealing with suspicions and allegations of abuse in relation to extremist ideologies and radicalisation can also be found within the University Prevent Policy.

2.5 The DDSL's are responsible for recording, retaining, and storing safeguarding records and concerns.

#### **3. Recording safeguarding concerns**

3.1 In relation to the welfare or safety of a child, young person and or adult at risk (e.g. concern about a physical injury, neglect at home or possible radicalisation) or concerns about the behaviour of a student, an employee or volunteer, it is important to record all relevant details, regardless of whether or not the concerns are shared with the police.

3.2 Safeguarding concerns referred to DSOs/DDSLs (see annex B) should be acknowledged in writing and kept on file.

3.3 The information recorded must be factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such, using the raising a safeguarding concern form (annex C).

3.4 To ensure continuity of care and provide a comprehensive picture of concerns, allegations, and their outcomes, a record of the safeguarding concern will be held for all allegations or suspicions of abuse involving staff or students by the DDSL (student-related incident) and the Director of Human Resources (staff related incident).

## **4. Data Protection**

4.1 Under the Data Protection Act 2018, individuals have a right of access to personal data that relates to them. This right of access may include a right to request access to records (in whole or in part), relating to suspicions or allegations of abuse involving the person making the request.

4.2 Under GDPR, there are restrictions that apply to the processing of personal information relating to children. Although the University does not generally process the data of children, there may be circumstances when it is necessary to do so.

4.3 If it is deemed necessary within a Faculty or department within the University to process the personal data of children, the Data Protection Officer should be consulted in the first instance to ensure that necessary steps are taken to ensure such processing is in accordance with the GDPR.

4.4 The University has mechanisms in place to identify staff or students who declare a previous mental health condition, episode or learning disability which may classify them as a adult at risk as part of the recruitment or admissions process. This assists the University in providing a safe, supportive environment with access to appropriate support both within the University and externally, through links with the NHS and local council social support services.

4.5 Where a student has declared this as part of the admissions process, this will be clearly indicated with their Student Information Console (SIC) record. For staff, details will be indicated on their Ciph employment record.

4.6 The University is responsible for securing an individual's express consent before it shares information with external agencies. This applies even in cases where the GDPR allows the University to share safety concerns with other agencies, such as the police, without the individual's consent.

4.7 Only where there is clear and compelling evidence of a requirement to do so, will information be shared with other agencies in the interests of protecting children, young persons, adults at risk and other individuals within the University community.

4.8 The University acknowledges an individual's right to withdraw consent at any time and will ensure individuals are aware of this. If consent is withdrawn, University records will be updated to reflect this.

4.9 If any staff member receives a request from a person for access to personal data (held either about that person or another individual) in relation to suspicions or allegations of abuse, the request should be forwarded to the appropriate DDSL (annex B) for consultation with the Data Protection Officer.

4.10 Further information on the University Data Protection policy can be obtained via <https://www.buckingham.ac.uk/about/policies/data-protection>.

## **5. Retention and storage of safeguarding records**

5.1 The DDSLs are responsible for ensuring that appropriate records are maintained and comply with safeguarding retention periods (see Appendix C).

5.2 Records of all student-related safeguarding concerns, incidents and outcomes will be held and stored electronically by the relevant DDSL in accordance with the University Data Protection policy, Data Protection Act and other relevant legislation. Access to records of student-related safeguarding concerns, incidents and outcomes will be limited to the DDSL and Registrar.

5.3 Records of all staff-related safeguarding concerns, incidents and outcomes will be held and stored electronically by the Director of Human Resources in accordance with the University Data Protection policy, Data Protection Act and other relevant legislation. Access to records of staff-related safeguarding concerns, incidents and outcomes will be limited to the Head of Human Resources and Registrar.

5.4 An electronic case log of all safeguarding concerns, allegations and their outcomes will be kept by the relevant DDSL in accordance with recording retention periods.

5.5 Personal data will only be kept for the length of time necessary to perform the processing for which it is collected.

## **6. Disposal action**

6.1 The date when records should be permanently deleted will be recorded on the University Safeguarding concerns and incident case log.

6.2 Information should be disposed of securely once it is no longer required.

6.3 Paper records should be shredded or disposed of in confidential waste and electronic records should be permanently deleted.

6.4 Relevant files and folders will be reviewed by the relevant DDSLs at the end of their retention period and deleted in compliance with the University Data Protection policy and safeguarding retention periods (see appendix A).

## **7. Related Policies and Procedures**

7.1 There are a number of University policies which contain provisions that are relevant to safeguarding the wellbeing of children, young people and or adults at risk.

7.2 Whilst this policy and guidance provided collectively underpins the University's provision of a safe and secure environment and supports the fulfilment of the University's statutory duties, the University is working towards further integrating the range of policies that contribute to the safeguarding of young persons and or adults at risk.

## Appendix A: Retention Periods

Type of record/ concern	Retention period
<p>Welfare concerns that require referral to social services or the police. For example, this would include -</p> <ul style="list-style-type: none"> <li>• concerns about physical, sexual, emotional or neglect of a child, young person or adult at risk,</li> <li>• disclosures from a child, young person or adult at risk about being abused or</li> <li>• information from a third party which might suggest a child, young person or adult at risk is being abused;</li> <li>• concerns about a parent or another adult, or a child, young person or/and adult at risk who has been abused by another child, young person or and adult at risk.</li> </ul>	<p>Records should be kept for <b>6 years after the referral</b> to the relevant DDSL or the police unless any need to be retained longer (e.g. due to relevant legal action; requirement to comply with any other statutory requirements).</p>
<p>Welfare concerns that do not require referral to social services or the police. For example where -</p> <ul style="list-style-type: none"> <li>• a child, young person or/and an adult at risk has been bullied,</li> <li>• overly pushy parents or</li> <li>• a very distressed child, young person or/and adult at risk where the distress is unrelated to abuse.</li> </ul>	<p>Records should be made of the concern and the outcome.</p> <p>Records should be kept for <b>1 year after the child, young person and/or adult at risk concerned ceases to engage with the University.</b></p>
<p>If concerns have been raised about an adult's behaviour (e.g. a student or member of staff) around children, young people or/and adult at risk</p>	<p>Records should be retained for <b>at least until the adult reaches normal state retirement age, or for 10 years</b> if that is longer.</p>