

Guidelines on risk assessment 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, (as amended), with terminology aligned to the Care Act 2014 definition of Adults at Risk, 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 that form the basis of the University's approach to risk assessment 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, section 5.

3. Responsibilities

3.1 All staff who intend to or may be put in the position of working with children, young people or adults at risk, should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

3.2. 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 and identify alternative working practices.

3.3 All staff assigned the responsibility of completing a risk assessment are required to ensure a copy of the completed risk assessment is filed centrally with the University Health and Safety Officer.

3.4 Key staff with specific responsibilities connected to the learner journey and staff employment are outlined below:

Head of Faculty/Associate Dean

- Identify applicants who will be under the age of 18 when their course starts, or who may be vulnerable for another reason, for example, owing to illness, a mental, learning or physical disability.
- Conduct interviews with applicants under the age of 18 or young people and adults at risk where required, to establish the extent of their social and personal preparation for study in a higher education environment.
- Work with the Wellbeing, Skills and Diversity department to make advance contact with incoming students under the age of 18 or identifying as a adult at risk to offer appropriate support.
- Liaise with Registry to ensure the relevant campus services are able to support incoming students under the age of 18, young people and adults at risk.
- Ensure all staff, students, and volunteers must comply with UK GDPR, the Data Protection Act 2018, and the University's Safeguarding Procedure when handling safeguarding information. Personal data must be collected only when necessary, limited to what is relevant, stored securely, shared only when required (including without consent if needed to prevent harm), and retained only for the specified period before secure disposal. All safeguarding communications must use secure University-approved channels (e.g., University email) and follow IT/email protocols to protect confidentiality.
- Ensure that an appropriate Safeguarding Risk Assessment is carried out and that any actions identified by the risk assessment are completed before the activity commences and recorded in the central risk assessment database. For example, this could include parental (carer) consent forms, contact information, allergens and dietary constraints, IT acceptable use agreement, etc.

- Appoint appropriate staff within their Faculty/Department to fulfil the role of Designated Safeguarding Officers to ensure the welfare of under-18 students, staff and adults at risk within Faculties/Departments is monitored and timely reporting of any concerns, allegations or incidents to the relevant DSO. See Annex B of the Safeguarding Procedure, for Designated Safeguarding Officer contacts
- Ensure staff, students, and volunteers who work with children, young people and or adults at risk are familiar with departmental and University safeguarding procedures to report and escalate safeguarding related concerns.

Admissions Manager

- Ensure Faculty Admissions Tutors are made aware of applicants who are likely to be under the age of 18 on enrolment or identifying as an adult at risk, to enable appropriate support to be provided to the incoming student.
- Ensure where an applicant discloses information relating to a mental health difficulty, that the appropriate admissions procedures are followed in line with the University Mental Health policy (see Appendix 5).
- Ensure the Wellbeing, Skills and Diversity team are made aware of applicants likely to be under the age of 18 on enrolment or identifying as an adult at risk, to enable consideration to be given to the provision of support by the relevant campus services.
- Ensure admission records of students under the age of 18 and those identifying as an adult at risk are kept and maintained centrally, to enable monitoring and support to be provided both within the University and externally (as needed) throughout their University journey.

Accommodation Manager

- Ensure records of students under the age of 18 and those identifying as an adult at risk residing in University accommodation are kept and maintained, to enable support to be provided by the relevant campus services.

Wellbeing, Skills and Diversity, Faculty Lead Mentor

- Discuss student support arrangements with the relevant academic departments to ensure the implications for matters such as Personal Tutoring and risk assessments are understood.
- Advise Accommodation where a student identifies as a adult at risk in need of community care services by reason of mental or other disability, age or illness; and is/or may be unable to take care of/or unable to protect themselves against neglect, abuse, significant harm or exploitation, to ensure appropriate support is provided to the incoming student.
- Make contact with parents, carers and/or guardians (where necessary) to ensure

appropriate support is provided to incoming students under the age of 18 or those identifying as an adult at risk.

- Hold 1-1 meetings with individual students in the context of student services and support.

Students' Union.

- Ensure procedures followed by societies, clubs or individuals are followed to maintain a safe environment for all students.
- Ensure staff, students and volunteers who work with children, young people and those identifying as adults at risk, are familiar with departmental and University safeguarding procedures to report and escalate safeguarding related concerns.
- Ensure child protection procedures are in place in relation to student societies and clubs, with access to some activities, clubs and societies restricted to students under 18.
- Ensure the necessary DBS checks are completed where appropriate for staff, students and volunteers prior to working with children, young people and those identifying as adults at risk.

Human Resources

- On notification from the Dean of Faculty/Head of Department or Recruiting Manager that a role requires a DBS check the HR Department will conduct DBS checks on relevant staff in Faculties/Departments. These are usually necessary only when contact is substantial and unsupervised. Student placements outside the University may raise additional issues.
- Ensure records of staff under the age of 18 and those identifying as an adult at risk employed by the University are kept and maintained, to enable support to be provided by the relevant campus services and external agencies where appropriate.
- Ensure Deans of Faculty/Heads of Department and Associate Deans are made aware of staff within their departments who are under the age of 18 and or those identifying as adults at risk, to enable ongoing appropriate support to be provided to the employee. This will include records on Apprentices, work experience or work shadowing.

Health and Safety Manager

- Monitor the operation of the University Safeguarding policy from a risk assessment perspective.
- Recommending modifications to the policy to the Registrar (or nominee) to ensure it evolves to meet regulatory requirements and best practice guidance

4. Conducting a risk assessment

4.1 Before embarking on any University activity that may involve staff or students working with Adults at risk (whether in a paid or unpaid capacity), it is advisable for a risk assessment to be conducted, part of which should cover safeguarding issues. This should be conducted by the Dean of Faculty/Head of Department or Recruiting Manager and forwarded onto the HR Department if the role requires a DBS check.

4.2 There are no fixed rules on how a risk assessment should be carried out; however, the following general principles should apply:

4.3 Incorporate the standard health and safety risk assessment

4.3a The University Health & Safety Committee has developed a code of practice on risk assessment which is available at: <https://fb77c667c4d6e21c1e06.b-cdn.net/wp-content/uploads/2019/07/Healthsafety-and-wellbeing-policy-and-procedures.pdf>

4.3b A risk assessment is a careful examination of what, in your area of work, could cause harm to people so that you can assess whether you have taken enough precautions or should do more to prevent harm.

4.3c Where appropriate, this process should include consideration of any risks that may occur involving adults at risk, both within the University and in settings outside the University, such as placements, field trips, summer schools, or open days where children, young persons or adults at risk may be in our care.

4.3d A standard risk assessment template is included (Appendix 1) for modification and adaptation as required.

4.3e The risk assessment checklist (Appendix 2) and risk assessment grid (Appendix 3) provide some areas for consideration in relation to the admission of under-18s, young persons and adults at risk. The University Mental Health policy offers an additional source of guidance to staff on supporting students identifying as vulnerable due to mental health difficulties (see Appendix 5).

4.4 Risks: Identify the nature, length, frequency, intensity and time of any contact with under-18s, young persons or adults at risk.

4.4a This is designed to help you identify the context within which the risks should be managed, in the areas of teaching or research, student recruitment or widening participation activities where individuals are likely to be in the company of a lone child, young person or adults at risk, and where there is little or no possibility of the activity being supervised or observed by others.

4.4b For this purpose, the terms ‘frequency’ and ‘intensity’ relate to the person doing the activity, not whether it is always with the same child, young person or adults at risk.

4.5 Precautions: Identify any potential risk areas and detail actions to prevent the risk from occurring.

4.5a Once you have identified the risks, you should consider how they might be mitigated or removed. For example, situations where there is only one member of staff or one student present with a lone child, young person or adults at risk should be avoided where practicable.

4.5b This part of the process may involve consideration of alternative working practices. For example, on occasions when a confidential interview or one-to-one meeting is necessary, it should be conducted in a room where the room and or exit is clearly visible. Where possible, the door to the room should be left open.

4.5c Meetings with any student or employee under the age of 18, young person or adult at risk outside the normal teaching or working environment of the University should be avoided.

4.5d Where such meetings cannot be avoided, another staff member should be informed that they are taking place and, wherever possible, ensure that more than one adult is present.

4.5e Where a potential risk of exposure to extremist ideologies and radicalisation has been identified, arrangements should be put in place in compliance with the guidelines outlined in the University Prevent Policy, section 11.4.

4.5f Link to escalation procedure

Where a safeguarding risk is identified during the risk assessment process, the University’s Safeguarding Procedure must be followed. This includes referring the concern without delay to the appropriate Designated Safeguarding Officer using the contact routes set out in Annex B of the Safeguarding Procedure.

4.6 Precautions: Identify any situations where a Disclosure and Barring Scheme (DBS) check might be required.

4.6a This would apply to staff or students whose their normal duties fall within the definition of Regulated Activity or are listed in the Rehabilitation of Offenders Act (Exceptions) Order 1975 or the Police Act Regulations.

4.6b The definition of “normal” in this instance is in accordance with the standard dictionary definition (or variations thereof), which is “usual, regular or typical”. Therefore individuals, positions or scenarios that have or create incidental, irregular or indirect contact with children, young persons or adults at risk not related to a position of employment, do not give rise to eligibility for DBS checks.

4.6c Decisions about whether an individual should be subject to a DBS check must form part of the safeguarding risk assessment process. This assessment should take into account the specific nature of the individual's duties, their work location, and the level and type of contact they will have with anyone under the age of 18 or with Adults at Risk, as defined in the University's Safeguarding Procedure.

4.6d In relation to students, and depending on numbers, it is advisable to allocate all under-18s within your department to the same Personal Tutor to minimise the volume of DBS checks that may be required.

4.6e If you have any queries relating to DBS checks for staff, please contact the Human Resources department by email at hr@buckingham.ac.uk

4.7 Record your findings

4.7a Keep a copy of the risk assessment form on file for future reference or use and provide a copy to your Head of Faculty/Associate Dean or Line Manager.

4.7b A copy of the risk assessment form should also be filed with the University Health and Safety Officer.

4.7c It is good practice to review your assessment from time to time - annually is a good guide. You should initial and date the assessment when you review it.

5. Related Policies and Procedures

5.1 There are a number of University policies which contain provisions that are relevant to safeguarding the wellbeing of children, young people, and adults at risk (see Appendix 5).

5.2 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 adults at risk.

Appendix 1: Risk Assessment Form

Department:
Activity:
Risks:
Precautions:
Emergency procedures:
Training required:
Access restrictions:
Assessment undertaken by:
Date:

Responding to a Disclosure of Abuse:

If, during the course of an activity, a child, young person, or adult at risk discloses that they are experiencing abuse or neglect, it is essential to respond calmly, listen carefully, and take their concerns seriously. Do not promise confidentiality—explain that you have a duty to share the information with the University’s Designated Safeguarding Officer (DSO) or Deputy Designated Safeguarding Lead (DDSL). Avoid giving personal opinions, making judgments, or attempting to investigate yourself. Make a careful written record of what was said, using the person’s own words, sign and date it, and submit it without delay via the Raising a Safeguarding Concern form. For full guidance, refer to the University’s *Safeguarding Procedure* (Sections 5.1–5.3), in the university regulations handbook.

Appendix 2: Admission of Young Persons and Adults at risk: Risk Assessment Checklist

Description and location of hazard	Who might be harmed	What is the risk	Comment/ Actions
Psychological capacity	Young persons and adult at risk	There will be large individual differences in the psychological capacity of young persons and some adult at risk based on differences in experience, skills, personality and attitudes. Lack of awareness might lead to an increased chance of an accident. Staff must be made aware of this.	Risk assessments and control measures adopted must concentrate on the areas of work that could be beyond a young or vulnerable person's emotional coping ability. • Ensure students are aware and reminded of appropriate contacts in Department/Faculty e.g. Faculty Administrators, Faculty Mentors, Personal Tutors. • Ensure students are aware and reminded of Specialist Support Services. • Ensure students are allocated an experienced academic adviser.
Physical capacity	Staff and students Young persons Young persons and adult at risk	Learning activities require physical contact between students and/or between students and staff. Young persons may not be physically capable of some manual handling activities, training and supervision must be provided. Young persons and adult at risk may not fully understand, retain or use the information provided for some manual handling activities. Staff must be aware of this.	Complete a risk assessment in compliance with the manual handling regulations. Further details can be found in the University Health and Safety policy. • Ensure all staff are aware of the need to maintain appropriate boundaries.
Biological agents	Young persons and adult at risk	Young persons and adult at risk are no more likely to contract infections from biological agents than adults. They may be at greater risk if they suffer from other disease or from the effects of medication or pregnancy.	Complete a risk assessment in line with COSHH requirements; identify measures to control any risks.
Ionising radiation	Young persons	The risk of developing cancer and hereditary defects from exposure to ionising radiation, which increases slightly for young people is controlled by setting statutory dose limits.	Design work procedures to keep exposure as low as reasonably practicable.
Toxic, harmful corrosive and irritant substances	Young persons and adult at risk	Young persons and adult at risk are not physiologically at any greater risk. The actual risk can only be determined through a risk assessment of the particular substances used.	Complete a risk assessment in line with COSHH requirements; identify measures to control any risks. • Ensure student is aware and reminded of appropriate procedures. • Additional supervision of activities may be required.

Appendix 2: Admission of Young Persons and Adults at risk: Risk Assessment Checklist contd.,

Description and location of hazard	Who might be harmed	What is the risk	Comment/ Actions
Electrical hazards	<p>Staff and students</p> <p>Young persons and adults at risk</p>	<p>The risk is one of electric shock, burns or electrocution and individuals failing to adhere to instructions provided.</p> <p>Young persons and adults at risk do not face greater physical risks from electricity than others. Young persons and adults at risk may not fully understand, retain or use the information provided around electrical hazards. Staff must be aware of this.</p>	<p>Young persons and adults at risk must not carry out any work involving electricity unless they have enough technical knowledge and experience to prevent injury and are under the appropriate supervision.</p>
Out of hours activities	<p>Staff and students</p> <p>Young persons and adults at risk</p>	<p>The risks associated with out-of-hours activities are connected with restricted access to other staff or support in the event of an emergency. Staff must be aware of this.</p> <p>Young persons and adults at risk may be required to take part in sessions out of hours or to undertake work alone in isolated areas of the campus</p>	<ul style="list-style-type: none"> • Minimise or avoid this wherever possible, considering whether the activity could take place during working hours • Ensure staff and students have the contact number for the relevant Campus Security teams. • Where such meetings cannot be avoided (1) conducted the meeting in a room where the room or exit is clearly visible; (2) ensure the door to the room is left open where safe to do so; (3) inform another staff member that the meeting is taking place; (4) ensure more than one adult is present • Ensure staff and students are aware of appropriate lone working procedures.
Working with animals	<p>Young persons or adults at risk</p>	<p>Young persons and adults at risk may be more at risk because of their inexperience and/or lack of appreciation of the risks.</p>	<p>Safety management systems must be put in place to prevent access to potentially aggressive animals, provide proper training, ensure adequate handling facilities are available and provide proper supervision.</p> <ul style="list-style-type: none"> • Risk assessments must be completed or revised to take into account lack of experience and immaturity
Noise	<p>Young persons Adults at risk</p>	<p>There is no evidence to suggest that a young person faces a greater risk of damaged hearing from noise exposure than others. Those identifying as adults at risk with a disability may, however react adversely to noise exposure depending on the nature of their disability.</p>	<ul style="list-style-type: none"> • Ensure compliance with the Noise at Work Regulations 2005 • Conduct or revise risk assessment to take into account students who have provided prior notification of an adverse reaction to noise exposure

Appendix 3: Factors increasing a person’s risks of abuse or neglect: Risk Assessment Grid

There may be a number of factors that may increase the risks of abuse or neglect to an individual.

Conducting a needs assessment can provide a useful insight into a person’s situation and any risk factors to support planning and the provision of appropriate support. The table below provides information on some potential risks for consideration in addition to those outlined in the Risk Assessment Checklist, Appendix 2.

The following examples illustrate personal and situational factors that may increase or decrease a person’s risk of abuse or neglect. This list is not exhaustive and should be considered alongside other indicators outlined in the University Safeguarding Procedure.

Personal characteristics of a person at risk that can increase risks may include:	Personal characteristics of a person at risk that can decrease risks may include:
<p>Not having mental capacity to make decisions about one’s safety including fluctuating mental capacity associated with mental illness and other conditions</p> <ul style="list-style-type: none"> • Communication difficulties • Physical dependency – being dependent on others for personal care and activities of daily life • Low self esteem • Experience of abuse • Childhood experience of abuse <p>Substance abuse</p>	<p>Having the mental capacity to make decisions about one’s safety</p> <ul style="list-style-type: none"> • Good physical and mental health • Having no communication difficulties or if so, having the right equipment/ support to communicate • No physical dependency or if needing help, is able to self-direct care • Positive former life experiences • Self-confidence and a high level of self-esteem

Social/ situational factors that increase the risk of abuse may include:	Social/ situational factors that decrease the risk of abuse may include:
<p>Being cared for in a care setting, that is, more or less dependent on others</p> <ul style="list-style-type: none"> • Not getting the right amount or the right kind of care and support when needed • Isolation and social exclusion • Stigma and discrimination • Lack of access to information and support • Being homeless or at risk of homelessness • Being the focus of anti-social behaviour 	<p>Good family relationships</p> <ul style="list-style-type: none"> • Active social life and a circle of friends • Able to participate in the wider community • Able to access support from family, friends and the wider community if needed • Good knowledge and access to a range of community facilities • The ability to remain active and independent • Access to sources of relevant information

Additional guidance on supporting students identifying as adults at risk due to mental health difficulties can be found within the University Mental Health policy available in the University regulations handbook.

Appendix 4: Definitions

The following definitions have been applied throughout this policy:

Safeguarding: Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and/ or adults at risk wherever possible.

Prevent: Part of the UK Government's counter-terrorism strategy (*CONTEST*). The Prevent Duty applies to the Higher Education sector and requires institutions to have due regard to the need to prevent individuals from being drawn into terrorism. This includes identifying and supporting those who may be vulnerable to radicalisation, regardless of age, and promoting resilience against extremist ideologies.

Radicalisation: the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism: Extremism as used within this policy 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.

Terrorism: References to terrorism within this policy refers to 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.

Child: For the purposes of this policy, a "child" or "children" refers to anyone under the age of 18 years, in line with the *Children Act 1989* and other relevant safeguarding legislation. The term "young person" or "young people" may be used to refer specifically to children aged 16 or 17, but safeguarding protections apply equally to all individuals under 18.

Adult at Risk:

The University bases its definition of an "adult at risk" on that used in the *Care Act 2014* and reflected in current statutory safeguarding guidance. An adult at risk is a person aged 18 or over who:

1. **Has needs for care and support** (whether or not the local authority is meeting any of those needs); and
2. **Is experiencing, or is at risk of, abuse or neglect** — including physical, emotional, sexual, financial, or discriminatory harm, or self-neglect; and
3. **As a result of those care and support needs, is unable to protect themselves** from the abuse, neglect, or the risk of it.

Safeguarding Adults at Risk: Whilst the University is not subject to the provisions of the Care Act 2014, the University draws broadly on this act to inform its policy on safeguarding adults at risk. We will play our part to:

- Ensure that the rights of adults at risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the adult at risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

The University however recognises that Adults at Risk sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and may not fully appreciate potential risks to their safety or well-being and therefore, it may not always be possible to fully defer to their wishes when seeking the best way forward.

“Work with children or Adults at Risk”: Within this policy “work with children or adults at risk” 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.

Member of the University: Reference to a “member of the University” includes staff, students and alumni of the University.

Student: References to “student” includes 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.

Staff: References to ‘staff’ include 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.

Head of Faculty/Associate Dean: Within this policy ‘**Head of Faculty/Associate Dean**’ refers to Heads of Departments for Academic teaching teams.

Head(s) of Department: Within this policy ‘**Head(s) of Department**’ refers to Heads of Departments for non-academic and Professional Services departments

Volunteer: “Volunteers” are generally members of the University but may include other associated persons volunteering to lead or support University-led activities for which they are not paid including for example volunteering activity or similar initiatives supporting widening participation and outreach events, etc.

Contractor: Contractors are employed by third party organisations to carry out work on behalf of the University. It is the responsibility of the contractor's employer to ensure that all necessary employment and safeguarding suitability checks are completed and to provide assurance to the University that this has been done.

DBS (The Disclosure and Barring Service): This statutory body has been created out of the merger of the Criminal Records Bureau and the Independent Safeguarding Authority.

Whilst the above listed policies and guidance collectively underpin the University's provision of a safe and secure environment and support 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.