



Child Protection & Adults at Risk - Policy (Safeguarding)

Originator name:	Andrew Browning
Section / Dept:	Secretariat
Implementation date:	August 2014
Date of next review:	August 2020
Related policies:	Safeguarding (Admissions Policy); Public Interest Disclosure (Whistleblowing) Dignity at Work and Study Policy
Policy history:	Update / amends to new policy template by C. Lowe, Jan 2015.

Version History

Version	Author	Revisions Made	Date
1	Various	First Draft, Updates, New policy template, Vulnerable adults, Prevent, Filtering.	April 14-Sep 17
2	Craig Lowe	Review and amends	Dec 2018

Approval History

Equality Analysis

Version	Reviewed by	Comments	Date
1	Equality & Diversity Staff Member's Name	Pending	

Committee Sign Off

Version	Committee Name	Date of Sign Off
1	Executive Board Committee (or other)	Sept 2017

1 Introduction

The policy is intended to provide an overarching framework for safeguarding and provides a general overview designed to be used in all the University's interactions with children and adults at risk. It focuses on issues relating to students, staff and the general public and takes as its starting point the fact that:

- a) The University of Surrey offers a range of courses and activities which will inevitably involve 'adults at risk' and children.
- b) The university offers services (e.g. student support), facilities (e.g. restaurants, sports) and courses (particularly those with a placement component), which may bring our students and staff into contact with adults at risk and children.
- c) Young people make up a disproportionately high number of those arrested for terrorist-related offences and of those travelling to join terrorist organisations;

It is intended to support compliance with the legal duties placed on the University by the Safeguarding Vulnerable Groups Act 2006 (as amended) and the Counter-Terrorism and Security Act 2015.

The Child Protection - Supporting Procedures document gives information and guidance on different circumstances where contact with children may occur or child abuse is suspected or reported. *The Safeguarding procedures – Health and Wellbeing Concerns* gives guidance on what to do when working with adults at risk.

Prevent and the University of Surrey

Higher education institutions have a duty of care to students, staff and visitors. The Counter Terrorism and Security Act 2015 introduced a new statutory duty for higher education institutions to have "due regard to the need to prevent individuals from being drawn into terrorism". This means that institutions now have a statutory duty to engage with the government's Prevent agenda. The government has published guidance setting out what steps higher education institutions are expected to take to meet this duty. This is available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

Further information on the University of Surrey's approach to its implementation of the Prevent Duty in respect of safeguarding individuals who may be vulnerable to radicalisation is available at:

<https://www.surrey.ac.uk/surreynet/keyinfo/prevent/index.htm>

The Vice Provost (Education & Students) (or nominee) acts as the University's Child Protection Officer. The University disclosure manager for Database and Barring Service (DBS) checks varies according to the position and a list can be found in appendix 1 of the supporting procedures.

DBS Checks can only be obtained for certain roles. To be eligible for a DBS check the position/role of an applicant must be included in the Rehabilitation of Offenders Act and / or and in Police Act Regulations. To be eligible for an Enhanced DBS without barred lists the role must meet the Safeguarding Vulnerable Groups Act 2006. To be eligible for an Enhanced DBS with the barred lists the role must meet the Safeguarding Vulnerable Groups Act.

	The University engages with children and adults at risk regularly on and off its premises and is committed to ensuring that all remain safe in all their dealings with the University.
1.1	Purpose
1.1.1	<p>This policy aims to:</p> <ul style="list-style-type: none"> • Promote and Prioritise the health, safety and wellbeing of children and adults at risk • Provide a framework for defining the steps that need to be taken in planning and managing any activity where children or adults at risk are involved, so that they are protected and that students and the staff do not put themselves in an unnecessarily vulnerable position. • Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support.
1.2	Scope
1.2.1	Staff, Students, Visitors.
1.3	Equality Analysis
1.3.1	Pending
1.4	Definitions
1.4.1	<p>Child - The law defines a child as being any person under the age of 18. [see 1.5.1]</p> <p>Adult at Risk and Vulnerable Adult - Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. All adults (vulnerable or otherwise) can, in certain contexts, be at risk of abuse and exploitation, including radicalisation. Some adults are more vulnerable than others.</p> <p>'Vulnerable Adults' includes those who, because of mental health difficulties, physical health conditions or personal circumstances, may be vulnerable to abuse, exploitation or significant harm. The Department of Health and Home Office (2000) defines 'an adult at risk' as follows: <i>'A person aged 18 years or older, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.'</i></p> <p>An adult may be vulnerable if he/she:</p> <ul style="list-style-type: none"> • Has a learning or physical disability; or has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or • Has a reduction in physical or mental capacity; or • Is in the receipt of any form of healthcare; or • Is detained in custody; or • Is receiving community services because of age, health or disability; or • Is living in sheltered or residential care home; or

	<ul style="list-style-type: none"> • there are observable changes in a child or adult’s appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation); or • there are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse including radicalisation and an identifiable risk of being drawn into terrorism. The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member’s responsibility to decide whether a child or adult has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have; or • a concern is raised that an individual presents a risk of abuse or harm towards a child or adult in relation to, for example, downloading, possession or distribution of inappropriate images or extremist material. <p>It is recognised that people who meet one or more of the criteria above may not be vulnerable or at risk at all, or all of the time. However, until a department has direct contact with people on an individual basis, it may be impossible to identify whether vulnerability exists in relation to an activity or event involving adults that they are planning.</p> <p>Abuse <i>A person may abuse a child or an adult at risk by inflicting harm, or by failing to act to prevent harm.</i></p> <p>Types of Abuse - See appendix for definitions of physical, emotional, sexual abuse, and neglect.</p> <p>Regulated Activity relating to children/ adults at risk - The Safeguarding & Vulnerable Groups Act 2006 states that DBS (enhanced with barred lists) checks should be carried out on staff who are carrying out a “regulated activity” on a regular basis. This includes, <i>“teaching, training, instructing, care for or supervision of children, providing advice/guidance on well-being, treatment or therapy of children or driving a vehicle only for children.”</i> (Any member of staff who will be unsupervised in such circumstances will need to be DBS checked, see Supporting Procedures 1.3.5)</p>
<p>1.5</p>	<p>Legislative Context</p>
<p>1.5.1</p>	<p>Children Act 1989 - www.legislation.gov.uk/ukpga/1989/41</p> <p>Children Act 2004 - www.legislation.gov.uk/ukpga/2004/31/contents</p> <p>Working Together – Working Together to Safeguard Children 2015</p> <p>Safeguarding and Vulnerable Groups Act 2006 - www.legislation.gov.uk/ukpga/2006/47/schedule/4</p> <p>Protection of Freedoms Act 2012 (amending the above) www.legislation.gov.uk/ukpga/2012/9/part/5/enacted</p> <p>Rehabilitation of Offenders Act 1974</p> <p>Sexual Offences Act 2003 - www.legislation.gov.uk/ukpga/2003/42/contents</p> <p>UN Convention (Rights of a Child), ratified by UK legislation, recognises those under 18 as children. [1] www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx</p> <p>Counter-Terrorism and Security Act 2015</p>

1.6	Health & Safety Implications
1.6.1	<p>Specific Health and Safety guidance applies to children, see supporting procedures document 1.3.9 and the Health and Safety Executive website / document</p> <p>http://www.hse.gov.uk/youngpeople/workexperience/index.htm http://www.hse.gov.uk/pubns/indg364.pdf</p> <p>Guidance should be sought from the relevant faculty Health and Safety advisor.</p>
2	Policy
2.1	Principles
2.1.1	<p>Every child and adult at risk who takes part in an activity organised by The University of Surrey should be able to participate in a stimulating and safe environment and be protected from neglect and physical, sexual and emotional abuse.</p> <p>The key principles that underpin this policy are:</p> <ul style="list-style-type: none"> • Anyone under the age of 18 years should be considered as a child. • All children and adults at risk have the right to protection from abuse; • All allegations of abuse will be taken seriously and responded to swiftly and appropriately; • To ensure that University of Surrey staff and students are provided protection and are aware of best practice, so that children and adults at risk can be protected and that they do not place themselves in an unnecessarily vulnerable position.
2.1.2	<p>The University of Surrey is committed to safeguarding and promoting the welfare and safety of children and adults at risk. We will:</p> <ul style="list-style-type: none"> • Adhere to University procedures to recruit staff and select students • Carry out appropriate Disclosure and Barring Service checks as necessary. • Ensure that staff and students are aware of The University of Surrey Safeguarding Policy and related procedures, and that appropriate staff and students are trained on a regular basis. • Take measures to block / filter some University internet traffic, blocking child abuse websites based on Janet subscription services. • Provide information to all interested parties regarding The University of Surrey safeguarding policies and procedures for working with children and adults at risk.

	<ul style="list-style-type: none"> • Provide information to teachers, group leaders, service providers and any other interested parties on The University of Surrey’s expectations regarding safeguarding when visiting the University and when our staff and students are involved in activities on premises external to the University. • Work closely with other organisations to safeguard children and vulnerable adults. • Have procedures for dealing with allegations of abuse against University staff members and students.
2.2	Procedures
2.2.1	Risk Assessments
	<p>The purpose of the risk assessment is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children or adults at risk. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or adult at risk and considering whether the activity could be supervised or observed by others.</p> <p>Information about risk assessments is available from the University Health and Safety department website: https://surreynet.surrey.ac.uk/staff-services/health-safety/resources</p> <ul style="list-style-type: none"> • Guidance on completion of risk assessments can be obtained from the University’s Health and Safety Department, Human Resources, and whoever is responsible for Health and Safety within the faculty/department that is hosting the activity. • Each risk assessment should be signed off by two people. <p>Further information is given in the Child Protection Policy (Safeguarding) - Supporting Procedures and the ‘Safeguarding - Supporting Procedures’ document section.</p>
2.2.2	General Information
	<p>Guidance has been provided in the supporting procedures document to illustrate different scenarios where staff / child or adult at risk contact may occur. Information is given:-</p> <ul style="list-style-type: none"> 1.3.1 To outline risk assessment procedures 1.3.2 To provide an advised code of conduct during contact with children or an adult at risk, including practices never to be sanctioned. 1.3.3 To help identify if abuse <i>may</i> be happening or has occurred 1.3.4 To set out what to do if you receive information regarding abuse, harm or radicalisation. 1.3.5 On Disclosure and Barring Service (DBS) Checks 1.3.6 On additional Information for University Staff and Volunteers <ul style="list-style-type: none"> -Employers and Public Liability -Health and Safety -External Visits -Internet Activities

	<p>-Mobile Phone -Advice to children</p> <p>1.3.7 On child visits and what to do in the event of a missing child on campus</p> <p>1.3.8 Guidelines for students who come into contact with children or an adult at risk as part of a volunteering role</p> <p>1.3.9 Guidelines for staff when dealing with children attending a work experience placement</p> <p>1.3.10 Staff/Students working as mentors with children or adults at risk on or off campus.</p> <p>1.3.11 Guidance on unaccompanied minors on University premises.</p> <p>1.3.12 On recording Allegations or Suspicions of Abuse.</p> <p>1.3.13 On authorisation for use of photographs</p> <p>1.3.14 Example Health and Safety Briefing to Under 18's group</p> <p>1.3.15 Example emergency information to visiting group of children</p> <p>1.3.16 Checklist for staff working with visiting children on or off campus</p> <p>1.3.17 University pastoral support roles always requiring a DBS check</p> <p>1.3.18 Government visa guidance for International students aged 16 or 17.</p> <p>1.4 Who to contact if you have further queries.</p>
3	Governance Requirements
3.1	Responsibility
3.1.1	<p>Overall responsibility for University children protection and vulnerable adults rests with the Vice Provost (Education & Students) or his/her nominee. See supporting procedures for named contact.</p> <p>All members of the University are expected to play an appropriate role in reducing the risk of harm to children and adults at risk.</p>
3.2	Implementation / Communication Plan
3.2.1	<p>This policy together with the associated procedures set out overarching responsibilities, definitions and principles of the University's approach to Child Protection and Adults at Risk.</p> <p>Implementation will be publicised to staff via the Leaders' Alert and SurreyNet. There will be direct email communication to colleagues in relevant offices. Training will be considered on request to HR.</p>
3.3	Exceptions to this Policy
3.3.1	<p>Providing a safe environment and response to identified risks in order to reasonably protect children and adults at risk from harm is essential. There are no exceptions to this policy.</p>
3.4	Supporting documentation
3.4.1	<p>Child Protection and Adults at Risk Policy - Supporting Procedures, Child Protection Child Protection and Adults at Risk Policy - Supporting Procedures, Vulnerable Adults https://www.surrey.ac.uk/currentstudents/ask/regulations/ Safeguarding: Health and Wellbeing concerns Guidelines for Staff</p>

3.5	Staff Contact – DSL.
3.5.1	<p>The Designated Safeguarding Lead for the University is the Head of Student Support Services. Please call the University Student Information Desk 01483 686868 and ask to be put through, or email c.lowe@surrey.ac.uk</p> <p>For advice for students on different matters please see the University referral chart https://www.surrey.ac.uk/currentstudents/Files/support-referral-chart.pdf</p>

Appendix 1 – Definitions of Abuse and significant harm / Prevent Duty

Abuse can come in many forms, possibly most obviously physical, sexual, emotional, and financial and neglect but can also include a wide range of other issues, including for example discrimination. Female Genital Mutilation, domestic violence, forced marriage and bullying are also issues which can and do occur within the student population but are easily overlooked.

There is some evidence to suggest that young people who are seen as vulnerable are sometimes targeted by groups which wish to radicalise the individual. Whilst the policy does not advocate the university undertaking a surveillance role, it is sensible to report situations which seem odd or give rise to concerns.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development. It may involve conveying to someone that they are worthless or unloved, inadequate, or valued only insofar as they meet the need of another person. It may feature age or developmentally inappropriate expectations being imposed which may include interactions that are beyond the child/adult at risk's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing someone to frequently feel frightened or in danger, or the exploitation or corruption of someone. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the said person is aware of what is happening. The activities may involve physical contact including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving the abused person in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

Radicalisation

Radicalisation includes grooming vulnerable individuals into a particular ideology to instil views that promote "us-and-them thinking", potentially to justify offending and the use of harm or violence against others to achieve an ideological goal

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may incur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Additional - Bullying

In addition to the definitions given above it is important to recognise the impact and extent of bullying in the lives of children and/or adults at risk.

Bullying is most often defined in terms of three components:

- it must occur over time, rather than being a single aggressive act;
- it involves an imbalance of power, with the powerful attacking the powerless;
- it can be psychological, verbal, or physical in nature.

Bullying can include:

- Being called names, insulted or verbally abused;
- Being deliberately embarrassed and humiliated;
- Being made to feel different or like an outsider;
- Being lied about;
- Being physically assaulted or threatened with violence;
- Being ignored;
- Having any possessions or equipment stolen or messed with by others.

Prevent Duty - Definition of terms

Prevent – “The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism... Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation” (Prevent duty guidance).

Prevent duty – The duty imposed on universities and other public authorities by the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. The government has issued statutory guidance for all public authorities, and guidance specifically aimed at universities, on this duty (the ‘Prevent duty guidance’).

Radicalisation – Defined in the Prevent duty guidance as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”.

Terrorism – The current UK definition of terrorism is given in the Terrorism Act 2000. This defines terrorism as 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 must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The terrorist ‘action’ can be that of individuals acting alone or as part of organised or well-trained groups. Four domains are identified: (a) International terrorism, (b) Northern Ireland related terrorism, (c) Extreme Right Wing terrorism and (d) other forms of both secular and religious terrorism (Prevent: Section 5). The Terrorism Act 2006 created a number of ‘offences related to terrorism’, including encouraging terrorism, glorifying terrorism, disseminating terrorist publications, training for terrorism and preparing terrorist acts.

Extremism – defined in the Prevent duty guidance as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas”.