



Safeguarding Procedures

Date created: 04/06/2018

Date revised: 04/07/2022

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Name:	Safeguarding Procedures	
Contact:	Vice – Provost and Executive Director, Bader College	
Purpose:	In conjunction with the Safeguarding Policy the Safeguarding Procedure sets out a framework for Bader College to safeguard children and vulnerable adults with whom the College’s work brings it into contact.	
Procedure:		
Step:	Procedures	Person(s) Responsible:
Step 1	<p>This Procedure is designed to assist Bader College to achieve the commitments set out above and to take reasonable steps to safeguard children and/or vulnerable adults who have contact with the College. It aims to provide clear guidelines and procedures for identifying risks, reporting concerns and ensuring that appropriate action is taken.</p> <p>Examples of areas where Bader College may have contact with children or vulnerable adults include but are not limited to:</p> <ul style="list-style-type: none"> • Teaching, supervision and support of students; • Experiential Learning Opportunities; • Visits to the College by school groups; • Outreach or volunteer participation activities taking place on or off campus; • The student residence; • Attendance, or participation, at private functions run commercially by Bader College or Herstmonceux Castle Enterprises; • Children accompanying members of staff to work; • Conferences; and • Placements and in other professional and clinical settings. <p>The type of situations which will result in Bader College implementing this Policy and Procedure may include but are not limited to:</p> <ul style="list-style-type: none"> • A child or vulnerable adult raising an allegation of abuse or harm or other inappropriate behaviour; • Suspicions or indicators that a child or vulnerable adult is being abused or harmed or is at risk of abuse or harm; • Observable changes in a child or vulnerable adult’s behaviour or appearance that may indicate abuse or harm or risk thereof; 	VPED All Faculty and Staff

- Concerns raised that an individual presents a risk of abuse or harm towards a child or vulnerable adult, e.g. in relation to criminal convictions or downloading or possession of inappropriate images;
- Signs or behaviour which may suggest a risk of abuse or risk of harm; and
- Indications that a child or vulnerable adult has need for care and support and is unable to protect themselves.

Bader College will take all safeguarding concerns including suspicions and allegations of abuse or harm seriously and will:

- Report concerns promptly;
- Check the suitability of staff whose duties and responsibilities involve regular contact or supervision of children.
- Ensure that appropriate suitability checks are carried out of staff, including criminal record checks and other checks where appropriate; and
- Make referrals to the relevant statutory authority based on identified and considered risk.

Designated Safeguarding Officers

The Vice-Provost and Executive Director of Bader College is the Principal Safeguarding Officer. The Director of Student Experience and Residence Life, for student issues, and the Director of Finance and Assets, for staff issues, are the Designated Safeguarding Officers (DSO).

Their responsibilities include:

- Undertaking relevant training in safeguarding procedures to ensure that their knowledge is current;
- Acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
- Acting upon concerns as appropriate in the circumstances, e.g. by making external referrals to East Sussex Adult Social Care, the East Sussex Duty and Assessment Team (for children); and
- Monitoring the implementation of the Safeguarding Policy and Procedure.

Dealing with Safeguarding Concerns

If a child or adult raises a safeguarding concern, the matter is to be reported on the Safeguarding Concern Form (Appendix 3) to the DSO.

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	<p>If it is a vulnerable adult being abused or harmed or at risk of abuse or harm, the DSO may make a referral to:</p> <ul style="list-style-type: none">• East Sussex Adult Social Care; and/or• East Sussex Police. <p>For children, the DSO may make a referral to:</p> <ul style="list-style-type: none">• East Sussex Duty and Assessment Team;• East Sussex Local Safeguarding Children Board through the Single Point of Advice (SPoA) for Level 3 or 4 concerns on the Continuum of Need¹; and/or• East Sussex Police. <p>If the DSO is not available, or the safeguarding concern involves a concern against them, then the member of staff to be contacted is the Vice-Provost and Executive Director.</p> <p>If any student or member of staff other than a DSO makes a referral to East Sussex Adult Social Care the East Sussex Duty and Assessment Team (for children), or the Police, then they must notify the DSO that a referral has been made as soon as reasonably practicable.</p> <p>The DSO will consult with East Sussex Adult Social Care or the East Sussex Duty and Assessment Team (for children) to determine whether the allegation warrants further investigation.</p> <p>Bader College may liaise with the local safeguarding children partnership: (https://www.esscp.org.uk/) or local safeguarding adults board (https://new.eastsussex.gov.uk/socialcare/worried/sab/) as appropriate.</p> <p>Confidentiality Staff should not guarantee absolute confidentiality to children who disclose information about abuse, but make clear that they may need to pass on the information to those who can provide help. Confidentiality is necessarily limited by the law and by some Bader College policies.</p> <p>When staff are aware that sensitive issues are about to be discussed, they should immediately make clear what are the limitations on confidentiality.</p>	
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¹ <https://new.eastsussex.gov.uk/childrenandfamilies/professional-resources-including-single-point-of-advice/how-the-continuum-of-need-works/the-continuum-of-need/>

	<p>The need to break confidentiality is rare but applies to safeguarding issues, where:</p> <ul style="list-style-type: none"> • the welfare of a child or vulnerable adult is at risk; • a student is at risk of being drawn into terrorism or ideologies that support terrorism or extremist ideologies are expressed; and/or • an intention to harm oneself or someone else are expressed. <p>When it is considered necessary to break confidentiality, staff are advised to first discuss the issues with a senior colleague (if possible) and to do so on what is called a ‘as much as needed, as little as possible’ basis only. Where possible and safe, the need to break confidentiality should be discussed with the person making a disclosure.</p> <p>In relation to safeguarding, assurance of confidentiality cannot be given to the individual disclosing the information. Instead, the person making the disclosure must be advised the information will be passed on to the relevant Safeguarding Officer, who may need to pass the information on to the police or Social Services. In some exceptional circumstances it may not be appropriate to inform the person making the disclosure that the information will be passed on if it places the safety of others at risk.</p> <p>Disclosure and Barring Service (DBS) Checks</p> <p>Bader College will take all reasonable steps to ensure that persons who are unsuitable to work with children, young persons and adults in vulnerable circumstances are prevented from doing so. Bader College will conduct checks as appropriate in accordance with relevant legislation. For UK nationals who have lived overseas and those who are non-UK nationals, a suitable check will also be required from each country of residence in addition to the DBS check.</p> <p>Any role which involves a Regulated Activity and/or significant contact with children, young persons or adults in vulnerable circumstances must be assessed by the person authorizing such work or employing new members of staff (or volunteers acting as agents of Bader College) to carry out such work. The purpose is to determine whether, and at what level, such checks should be carried out. A satisfactory check must be received by Bader College before any work deemed to require a check is carried out.</p>	
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	<p>Factors taken into consideration when determining eligibility for a DBS check, and /or the appropriate level and type, include the frequency and level of supervision of the activity in question.</p> <p>Contractors shall be expected to complete a DBS check.</p> <p>Teaching, training or instruction of under 18's on an occasional basis is not considered to be regulated activity. "Occasional" means less than the frequency of activity outlined as:</p> <ul style="list-style-type: none">• by the same person once a week or more;• on 4 or more occasions in a 30-day period; or• at any time between 2am and 6am <p>Any individual who is involved in teaching, training or instruction of under 18's on an occasional basis must be supervised. To comply with the Act supervision must be:</p> <ul style="list-style-type: none">• Reasonable in all the circumstances to ensure the protection of children; and• Provided by a person engaged in regulated activity, and conducted on a regular and day to day basis. <p>Bader College will not routinely DBS-check staff or students who are going into schools on an occasional basis, and/or who may be meeting with groups of under-18's; this is the responsibility of the school or group.</p> <p>Student Risk Assessment</p> <p>The Safeguarding Policy and Procedure extends to all Bader College's registered students on and off campus (including placements or other activity associated with, or organized by, Bader College) regardless of their mode of study and irrespective of whether a matter arises during term-time or vacation.</p> <p>A Manager or their nominee is responsible for ensuring that appropriate risk assessments are carried out which seek to identify any risks posed by a student and consider the most appropriate way to manage such risks. This may involve other members of Bader College staff in collating relevant information including from external experts or professions where appropriate.</p> <p>Allegations made against a student or a member of staff</p>	
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In situations where there is concern that the student may pose a safeguarding risk the Director of Student Experience and Residence Life or their nominee will determine the exact process to be followed according to the circumstances of the case and with due attention to fairness. Normally, the information and concerns will be shared with the student (who is thought to pose a risk), and they will be given the opportunity to respond to that information and concern. In some situations, this may not be appropriate, e.g. where it was considered this might result in harm being committed against a child or adult.

Where, as part of the risk assessment process, the Manager or their nominee invites the student to a meeting to discuss the concern that has been raised, the student will be given the ability to respond. The student has the right to be accompanied to this meeting by a friend, relative, member of Bader College staff, counsellor, or legal representative.

The outcome of the risk assessment process may result in:

- Referral to East Sussex Adult Social Care, the East Sussex Duty and Assessment Team (for children), or the Police;
- No action to be taken; or
- Referral to an alternative procedure, e.g. Queen's University Non-Academic Misconduct Process or Fitness to Study/Student At Risk Procedure.

Should a referral result in a criminal investigation any internal investigation of the incident will be deferred until the conclusion of the criminal proceedings. As outlined in other Queen's documents, interim terms and conditions may be imposed to ensure a safe campus.

The Manager or their nominee is responsible for ensuring that a record of the risk assessment process and its outcome is made.

Where an allegation of inappropriate behaviour, abuse or neglect is made against a member of staff (occurring in the course of their work), the allegation will be referred to the DSO, who in conjunction with the Senior Management Team will consider whether referral to the local authority or other external agencies is appropriate.

In accordance with its employment procedures, Bader College will undertake an investigation in accordance with the Bader College Disciplinary and Dismissal Procedure. Bader College reserves the right, in accordance with its employment procedures, to suspend and /

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	<p>or dismiss staff from employment or from undertaking a specific role with respect to that employment.</p> <p>Disciplinary action may be taken against staff, in accordance with the University's Disciplinary and Dismissal Procedure, for a failure to comply with this policy.</p> <p>Reporting to the Disclosure and Barring Service (DBS). Bader College is under an obligation to notify the DBS if it terminates a student's registration in their programme of study or their involvement in activities that involve children or vulnerable adults, as a result of suspected abuse or harm or risk of abuse or harm. A report will also be made if such action would have been taken if the student had not voluntarily ceased to follow the programme and/or participate in the activity. The report will be made by one of the DSOs.</p> <p>Sensitive Information Issues relating to safeguarding are highly sensitive and are governed by legislation relating to confidentiality, human rights, and/or data protection. Only those who need to know from a professional perspective should be informed or receive written information about allegations.</p> <p>It is recognized that dealing with these situations and listening to personal accounts can be distressing. A debriefing session may therefore be essential. Should this take place, it is important to do so without reference to identifying details and be facilitated by appropriately trained personnel including but not limited to outside human resources experts.</p> <p>Records made about allegations should be kept for six years after the last action or complaint and then destroyed including if an allegation is found to be false.</p> <p>Use of Bader College facilities by External Parties Bader College has no control over, and assumes no liability or responsibility for, ensuring the welfare of children or vulnerable adults who are brought to Bader College by parents, guardians, schools, or groups or who are on Bader College premises without their knowledge or consent.</p>	
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	<p>External groups or organizations that hire or use Bader College grounds or facilities are responsible for ensuring that appropriate care is given and that staff and volunteers are DBS checked and comprehensive risk assessments are undertaken in relation to the health, safety and wellbeing of children and/or vulnerable adults participating in the activities. Where the University is the not the organizer of the activities, fully completed risk assessment documentation and assurances regarding completion of DBS checking procedures must be provided before any booking may be confirmed.</p> <p>Should a child and/or vulnerable adult who is on campus with an external organization makes an allegation of abuse to Bader College employee about a member of that external organization, the University employee will notify the appropriate DSO who will notify the external organization. Bader College expects the organization to follow its own policy and will require confirmation that the appropriate action has been taken.</p> <p>In the event of an allegation of abuse the DSO, in consultation with the Senior Management Team, will consider whether it is permissible to allow the external organization continued use of the facilities during the investigation period and beyond.</p> <p>Training All staff and students whose roles and responsibilities include regular contact with children or adults who are potentially vulnerable will receive regular training and guidance appropriate to their role. All staff will be made aware of the Safeguarding Policy and Procedure and related guidance.</p> <p>Monitoring and Evaluation The DSO's will record any incidents relating to safeguarding concerns and will report them in an anonymized form to the BISC Management Team on an annual basis. This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.</p>	
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Date Approved:	04/07/2022
Approval Authority:	<i>Senior Management Team</i>

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Commencement Date:	Select the date on which this guideline will become active.
Amendment Dates:	04/07/2022
Date for Next Review:	30/06/2023
Related Documents:	<i>Sexual Violence Policy Involving Queen's University</i> (Policy on Sexual Violence Involving Queen's University Students University Secretariat and Legal Counsel (queensu.ca)), <i>Harassment and Discrimination Complaint Procedures</i> (Complaint Procedure University Secretariat and Legal Counsel (queensu.ca)), <i>Queen's University Student Code of Conduct</i> (Queen's University Student Code of Conduct (queensu.ca)).

Appendix 1 - Guidance for Staff Working with Students Under the Age of 18 Years

All staff who have regular one-to-one contact with students who are under the age of 18 should adhere to the following guidance to ensure safety both for themselves and the young person.

If you have any concerns or queries arising from reading this guidance please contact the Student and Enrolment Services Manager who is responsible for matters relating to the safeguarding of vulnerable groups.

General Guidelines

- Respect all individuals whatever their age.
- Place the safety and wellbeing of the young person first. It must be placed before any personal or organizational goals and before loyalty to friends and colleagues.
- Form appropriate relationships with young people. These should be based on mutual trust and respect.
- Be aware of the relative powerlessness of young people compared to staff members.
- Be committed to actively preventing the exploitation and abuse of children and young people.

Guidelines for working students under the age of 18 years

- Conduct meetings with the student either with another staff member present or in an open environment (e.g. leave the office door open/ensure visual access and do not hold meetings when lone working). Where this is not possible, the member of staff should ensure that there is another adult nearby.
- If staff have a concern about a student which specifically relates to the age of an under 18-year-old student, they can contact the Director of Student Experience and Residence Life and/or refer to the Safeguarding Policy and Procedure.
- Academic staff should follow guidance on signposting, consultation and referral to appropriate services if they have concerns about individual students.
- If physical contact is necessary, e.g., for demonstration purposes, ensure it takes place only with the full consent of the student and that its purpose is clear. Use statements such as 'I am going to take your arm now, is this okay'.
- Do not use touch as a form of communication, even to comfort a student who is distressed.
- Consider implications of transporting students in your own vehicle, offer alternatives when possible so the student travels with peers. Bader College Insurance does not provide coverage for this nor do domestically insured vehicles.
- Consider your expected behaviour in certain situations and what might be considered unacceptable, e.g., sexually suggestive comments, inappropriate language.
- Be mindful that it is a criminal offence for any person in a position of trust to engage in sexual activity with someone who is under 18.

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- Remember that it is illegal for students who are under 18 to buy alcohol, and that it would not be appropriate to offer them alcohol. Planning and organization of events involving students should take this into account.

As a member of BISC staff you should never:

- Spend unnecessary amounts of time alone with a student away from others
- Take students in your car or to your home where they will be alone with you
- Engage in or allow others to engage in rough, physical or sexually provocative games, including horseplay
- Allow or engage in any form of inappropriate touching
- Allow students to use inappropriate language unchallenged
- Make sexually suggestive comments to a student, even in fun
- Exploit your authority over a student unnecessarily as a form of control
- Allow allegations made by a student to go unchallenged, unrecorded or not acted upon
- Provide personal or intimate care for a student unless specifically employed to do so
- Give any medication to a student (prescribed or otherwise) unless you are trained to do so and / or a full risk assessment has been undertaken

Appendix 2 – Types of Abuse or Harm

Abuse is a violation of an individual's human and civil rights by any other person or persons and may result in significant harm to, or exploitation of, the person subjected to the abuse.²

The following list is an example of the types of abuse or harm children or adults may encounter (this list is not exhaustive):

- **Physical abuse or violence**, including hitting, shaking, throwing, slapping, pushing, kicking, poisoning or the giving or supply of illegal drugs, misuse of medication, burning, scalding, drowning, suffocating, restraint or otherwise causing physical harm, or inappropriate sanctions.
- **Sexual abuse**, including grooming, rape and sexual assault or sexual acts to which the child or adult has not consented, or could not consent or was pressured into consenting; the activities may be physical or non-physical for example involving children or adults in looking at, or in the production of, sexual images.
- **Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Financial abuse**, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions or benefits.
- **Physical or emotional neglect and acts of omission**, including ignoring medical or physical care needs, failure to protect a child or adult from physical or emotional danger or to ensure adequate supervision, failure to provide access to social care health, or educational services, the withholding of necessities such as medication, adequate nutrition and heating.
- **Discriminatory abuse**, including racist, sexist, ageist abuse based on a person's disability, and other forms of harassment, slurs or similar treatment.
- **Internet/electronic abuse**, the use of modern communication technologies (e.g. internet, text or video messaging, e-mail, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them.

It is important to note that abuse can:

- Consist of a single act or repeated acts;
- Be intentional or unintentional or result from a lack of knowledge;
- Be an act of neglect, an omission or a failure to act;
- Manifest itself as what might otherwise be labelled bullying;
- Cause harm temporarily or over a period of time;
- Occur in any relationship;
- Be perpetrated by anyone, individually or as part of a group or organization;
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on BISC computers or equipment.

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The following may indicate that abuse is taking place (this list is not exhaustive):

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child, adult's or carer's explanation appears inconsistent;
- The child or adult describes an abusive act or situation;
- Unexplained changes in behaviour;
- The display of inappropriate behaviour (sexual or otherwise);
- Apparent mistrust of others;
- The child or adult appears increasingly unkempt.

Appendix 3 - Safeguarding Concern Form

Name of child/vulnerable adult:	
Date of birth (of child):	Gender: (M/F - undisclosed)
The child's/vulnerable adult's account:	
Time, location, date or other relevant information:	
Description of any visible bruising or other injuries:	
Any other observations/information:	
Action taken:	
Signed:	
Name (print):	
Position:	
Date:	

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Appendix 4 – What to Do and What Not to Do

The following list of useful dos and don'ts is based on those included in the Safeguarding Children: Guidance for English Higher Education Institutions (HEIs) – Department for Innovation Universities and Skills (December 2007).

If a child or adult discloses that they are experiencing abuse or harm or if there are suspicions a child or adult is at risk of abuse or harm consider the following:

 You should:	 You should not:
Be supportive	Panic
Take what the child or vulnerable adult says seriously	Delay
Remain calm	Promise to keep secrets
Reassure them that it was right to tell someone	Ask leading questions
Use language they understand	Ask them to repeat the story unnecessarily.
Explain what will happen next, i.e. that disclosure of relevant information may need to be made to the Designated Safeguarding Officer	Express any opinions about what you are told.
Write down verbatim immediately afterwards what was said, including the time, place and any other observations: sign and date the record.	Discuss the disclosure with anyone other than the Designated Safeguarding Officer and other relevant personnel.
Pass the report to the Designated Safeguarding Officer.	Start to investigate.
Remember that you may need support. Seek advice and support for yourself from HR and/or the Wellbeing Service.	Contact the alleged abuser

Appendix 5 – Useful Links

East Sussex Adult Social Care

- Homepage: <https://new.eastsussex.gov.uk/socialcare/>
- Report a concern: <https://new.eastsussex.gov.uk/socialcare/worried/report/>

East Sussex Child Protection and Safeguarding

- Homepage: <https://new.eastsussex.gov.uk/childrenandfamilies/childprotection/>
- Report a concern: [Report a concern about an adult | East Sussex County Council](#)

East Sussex Safeguarding Children Partnership Homepage: <https://www.esscp.org.uk/>

Keeping Children safe in Education – GOV.UK

- Document List: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Training Opportunities:

- National Society for the Prevention of Cruelty to Children: NSPCC
<https://www.nspcc.org.uk/what-you-can-do/get-expert-training/>
- Social Care Institute for Excellence: <https://www.scie.org.uk/training/safeguarding/>