

Safeguarding Framework

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Approved by Senate – September 2020

A Statement of Intent

The University recognises that:

- a) We have responsibility to safeguard the welfare of:
 1. Children¹ within the University community.
 2. Young people² within the University community.
 3. Vulnerable adults³ within the University community.
 4. Those children, young people and vulnerable adults who come into contact with University activities.
 5. University students at risk of harm or radicalisation⁴.
- b) The welfare of the child, young person, vulnerable adult or student for whom we have duty of care is paramount.
- c) Where we have a duty of care, all individuals, regardless of age, disability, gender, ethnicity, religious belief, sexual orientation or gender identity have the right to equal protection from all types of harm or abuse.
- d) We must work in partnership with those for whom we have a duty of care and with appropriate individuals and agencies to promote safeguarding.

For the purpose of this policy, UON has safeguarding responsibilities in relation to:

- a) All current students.
- b) Prospective students engaged in UON activities.
- c) Vulnerable adults registered as current students.
- d) Vulnerable adults engaged in UON activities as prospective students.
- e) Children, young people and vulnerable adults engaged in UON activities.
- f) Staff during their duties.
- g) External organisations/individuals where the University is engaged in branded activities.

This policy covers the responsibilities of all members of the University engaged in any activity in which children and/or vulnerable adults are present.

All members of staff and students engaged in activities involving children and/or young people and/or vulnerable adults, either as a volunteer, researcher, worker or employee, are expected to familiarise themselves with all aspects of this framework and associated policies. Additionally, it is recognised that some members of the University will be

¹ A child is a person under the age of sixteen.

² A young person is someone aged between sixteen and eighteen

³ A vulnerable adult, as defined in Section 59 of the Safeguarding Vulnerable Groups Act 2006, is someone over the age of eighteen who is or may be unable to take care of themselves, or is or may be unable to protect themselves against significant harm or exploitation, due to disability, age or illness.

⁴ A student at risk of harm or radicalisation, for the purpose of this framework, is one who is at risk of harm or exploitation relating to their physical, mental, psychological wellbeing or potential for being drawn into criminality.

required to familiarise themselves with and adhere to the safeguarding policies of partners with whom the University works. This includes students who are registered for programmes that require them to engage in regulated activity.

The definition of safeguarding adopted by the University is the 'Protection of children, young people and vulnerable adults from harm or abuse'.

The purpose of this Framework is:

- a) To reflect the legislative context and take account of relevant guidance and good practice relating to the education sector.
- b) To provide protection for the children, young people and vulnerable adults who come into contact with UON.
- c) To provide staff, students and volunteers with guidance on procedures that must be adopted in order to ensure safeguarding in relation to children, young people and vulnerable adults and in the event that they suspect a child, young person or vulnerable adult may be experiencing, or be at risk of, harm.

The University's policy framework is supported by a series of operating procedures relating to the above activities.

There are also legal and policy requirements relating to our engagement with others (e.g. Health and Safety, Equality Act) that are not outlined in this policy but must be observed.

Policies associated with this Framework include:

- a) Admissions.
- b) Prevent Duty and Safeguarding Guidelines.
- c) Health, Wellbeing and Fitness to Study.
- d) Fitness to Practice.
- e) Children on Campus.
- f) Students under the age of 18.

Policies in relation to staff reside with HR.

This Framework has been developed in the context of relevant external legislation, including The Children Act (2004), The Safeguarding Vulnerable Groups Act (2006) and the Data Protection Act (2018).

B Governance Structure and Responsibilities

B1. Student Experience Committee (SEC)

SEC, under the designated accountability to Senate, has responsibility for:

- a) Provision of guidance and support relating to safeguarding (relating to individuals and to specific populations).
- b) Development, review, update and dissemination of over-arching policy and procedures.
- c) Consideration and adoption of specific policies from individual academic areas and departments.

- d) Delegation of responsibilities to individual academic areas and departments as appropriate.
- e) Responding to changes in legislation, regulation and guidance from appropriate external agencies.

B2. The Lead Safeguarding Officer (LSO)

The Academic Registrar is the Lead Safeguarding Officer (LSO). The LSO is the main point of contact for individuals wishing to report any incidents of harm or potential harm. The Academic Registrar is also the designated PREVENT Duty Officer and concerns should be raised in accordance with the [PREVENT Duty guidelines](#).

The Lead Safeguarding Officer will be responsible for:

- Liaison with external agencies and ensuring highest level of confidentiality while ensuring that information is shared as necessary to safeguard individuals and the University's compliance with legislation, regulation, relevant guidance and the University's reputation.
- Monitoring and reviewing policy and procedures in respect of safeguarding.
- Reporting as necessary to Senate and/or the Board of Governors.
- Oversight of risk assessment activities when required.

The Deputy Safeguarding Officer is the nominated deputy for the LSO and the operational lead for safeguarding in the University. This will be the Head of Student Services.

Information, evidence and guidance will be sought from other officers of the University. Those officers will depend on the nature of the case:

- For those involving students, officers will normally, but not necessarily or exclusively, include the: Residential Life Team Leader, Student Guidance and Information Manager, Additional Needs Manager, Student Support and Advice Manager and the University Police team.
- For those involving a child or young person who attended campus through events organized by the Schools Liaison and/or Schools Engagement Teams, officers will normally, but not necessarily or exclusively, include the: Head of HE Schools Engagement, the Senior Marketing Officer.

The above-mentioned officers form a Safeguarding Panel which meets as necessary and is chaired by the Academic Registrar or Head of Student Services.

B3. Faculties and Departments

Faculties and Departments are responsible for

- a) valuing the needs, views and best interests of those considered to be at risk.
- b) adopting relevant protection guidelines through procedures for staff, students and volunteers.
- c) recruiting staff and volunteers safely, ensuring all appropriate checks are made.
- d) sharing information about safeguarding good practice with staff, students and volunteers and with any external agencies or individuals as appropriate.

- e) sharing information about concerns with agencies who need to know, and involving internal and external individuals appropriately.
- f) providing effective management for staff and volunteers through supervision, support and training.
- g) Identifying safeguarding officers within their own areas as necessary.

B4. Information Sharing

Information will be shared in the case of a safeguarding issue or in circumstances where the University thinks the health and wellbeing of the student may be at risk. The rationale and parameters of this information sharing are set out in the [Student Code of Conduct](#). Such information sharing complies with Data Protection legislation. It should be noted that information sharing related to those under the age of 18 may be managed differently, as per the Students under the Age of Eighteen Policy.

In other circumstances, information sharing will be governed through processes involving consent.

Disclosure concerns must be shared with the LSO, Deputy LSO and/or the Data Protection Officer.

Relevant information will be shared with external agencies as required/appropriate and in accordance with data protection regulations.

Staff and students need to be aware that the University will report legitimate concerns or suspicions to appropriate agencies, always in accordance with relevant guidance and legislation (including Data Protection legislation). Staff and students should also be aware of their responsibility to advise designated safeguarding officers if they have cause to believe that a person covered by this policy is at risk, and to take action in line with current and relevant guidance as required.

C Regulated programmes of study

C1. Disclosure and barring checks

In accordance with current policy and legislation, the University will ensure appropriate disclosure and barring checks are in place for regulated programmes of study. These processes are set out in the following:

1. [Admissions Policy](#) (section 4.8).
2. [Admission of Students with Criminal Convictions Policy](#).
3. University webpages:
 - <https://www.northampton.ac.uk/student-life/new-students/before-you-arrive/disclosure-and-barring-service-dbs/>
 - <https://www.northampton.ac.uk/undergraduate/how-to-apply/>
 - <https://www.northampton.ac.uk/postgraduate/how-to-apply/>
 - <https://www.northampton.ac.uk/about-us/privacy-policy/>

C2. Risk Assessments

Risk assessments, where required, are managed according to appropriate processes. The Placement and Work-Based Learning Team oversees risk assessments for

programmes of study involving placement activity.

D Students under 18

D1. Admission of students under the age of Eighteen

In accordance with the University's [Admissions Policy](#), the University will admit students who are able to demonstrate the potential to benefit from, and have a reasonable chance of successfully completing, its programmes of study. This may include students who are under the age of 18.

The University's [Students under the age of Eighteen Policy](#) and associated procedures set out how the University approaches matters associated with the recruitment of students under the age of eighteen.

D2. Under 18s in Residences

The University does not generally allow students under the age of 18 to live in halls of residence as students.

As per the University's [Accommodation Terms and Conditions](#) and the [Overnight Guest Policy](#), the University does not permit guests under the age of 18 to stay overnight in halls of residence when visiting a resident. Nonetheless, individuals under the age of 18 may be permitted to stay on campus as part of other activities (e.g. those run by the Schools Engagement Team and Schools and Colleges Liaison Team). Where this is the case, the policies and procedures of those teams will apply.

E Children and Young People on Campus

E1. Outreach activities – Schools Engagement Team and Schools and Colleges Liaison Team

The Schools Engagement and Schools and Colleges Liaison Teams follow the following processes to ensure security of children and young people coming onto campus to participate in University activities, and to ensure security of children and young people interacting with University staff offsite:

- Staff are DBS checked
- DBS paperwork is presented on arrival at all schools/colleges
- It is made clear to schools/colleges that the team should always be accompanied by an appropriate school/college staff member during any of the outreach activities we offer and at no point left unaccompanied
- It is stated that the University is not responsible for the behaviour of students during University outreach activities
- Where the University holds data or personal information for those under eighteen (including those under sixteen), this is managed through information sharing agreements with relevant organisations. In such circumstances, data held will normally include 1st name, 2nd name, DOB, post code, school, ethnicity, FMS and looked after status.
- Staff to student ratio at any on campus event is 1:10, unless the school/college is able to provide a satisfactory school/college policy that states adequate alternative arrangements are in place, and implementation of this remains the school/college responsibility at all times.

- Student ambassadors are fully trained prior to working on any outreach activity and are always accompanied by school staff. It is made clear to the school/college that as student ambassadors and not staff members they are not DBS checked.
- All travel arrangements to on or off campus events are made by the school/college to ensure that the travel company meets their requirements
- In any instance where an individual expresses/shares information to a member of the team that indicates they are feeling unwell, unsafe or vulnerable this is immediately reported to the accompanying member of staff at/for the school/college. A follow up communication is then sent within a 48 hour period to enquire whether the matter has been addressed/is being dealt with.

E2. Children on Campus

The Children on Campus Policy [link to be provided] provides information on how the University manages risk associated with children and young people being present on campus.

E3. Safeguarding of under 18s events run by third parties

Conference organisers are responsible for implementing a system of accredited identification for all persons attending a conference where there are groups of under 18s attending. Appropriate adult to under 18s ratios must be maintained to ensure adequate supervision. Third parties renting space to run conferences or other activities e.g. summer schools, will be advised by Estates and Campus Services.

F Criminal convictions

F1. Applications

The [Admission of Students with Criminal Convictions Policy](#) sets out the way in which the University manages applications from those with criminal convictions. It should be noted that changes to Data Protection legislation in 2018 led to a fundamental review and revision of this policy and the limitation of when this information is requested.

F2. Accommodation

The University is currently investigating options for requesting information on criminal convictions from those applying to live in the University's Halls of Residence.

F3. Convictions during studies

Where a student has been convicted of a crime during their studies that leads to a non-custodial sentence, the student should refer to the Admission of Students with Criminal Convictions Policy to determine whether disclosure is required.

Where a custodial sentence of less than one year has been given the student will normally be suspended from their studies. For sentences longer than one year a student will normally be withdrawn from their studies, and informed that they may reapply on their release by following the University's processes.

In some circumstances a student's conviction may also lead to the student being considered under the [Student Disciplinary Policy](#). In such circumstances the protocols and penalties under the Student Disciplinary Policy will be followed. This may include permanent expulsion from the University.

G Vulnerable Adults

G1. Students

It is possible that a current student could be/become a vulnerable adult. In such cases, the [Health, Wellbeing and Fitness to Study Policy](#) may need to be utilized. Where this is being considered, the requirements of that policy will be followed. The Safeguarding Panel will be utilized as necessary.

G2. Visitors

Concerns around procedures and practice relating to vulnerable adult visitors will be referred to the relevant Departmental Director, depending on the reason for the vulnerable adult being onsite.

H PREVENT Duty

The [PREVENT Duty guidelines](#) provide advice to staff on dealing with concerns in relation to potential radicalisation of students. Relevant policies also reference these guidelines. In addition, all staff are required to complete online training on PREVENT, reviewed every three years.

I Students on Placements

Students on placement must adhere to the placement's safeguarding policies and procedures.

Students on placement are likely to be subject to the Fitness to Practice Policy if concerns regarding Fitness to Practice are raised.

Further guidance on managing safeguarding matters on placements is available from the Placements and Work-Based Learning team.

J Agency, Contract and temporary staff

See HR policies.

K Sporting Facilities

This policy is still under development by the Director of Estates and Campus Services.

L Research

Research projects involving children are subject to the University's Ethics Policy.

M University of Northampton International College (UNIC)

The University of Northampton International College has a comprehensive policy⁵ for the care of students under the age of 18, including considerations relating to the appointment of a UK based guardian, and additional support from identified members of staff within the College. Any UNIC student under eighteen is required to live either with the College's approved accommodation provider (Host International) or with a family member.

⁵ The Policy is Navitas Europe's Policy NPR M1a: Safeguarding Children and Vulnerable Adults

All College staff are subject to DBS checks.