Safeguarding Policy

Organisation	Leeds Beckett University
Owner	Registrar & Secretary's Office
Developed in consultation	Registrar & Secretary's Office; Student Safeguarding and Safety Group (representing all Schools and relevant Service areas)
Target audience	Staff/Students/third parties that come into contact with children and/or Adults at Risk as a result of activities organised by the University
Sensitivity	Public
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Status	Published
Appendices	• Annex A – Key Contacts • Annex B – Categories of Abuse • Annex C – Safeguarding Code of Conduct • Annex D – Flow chart on considering a student/apprentice concern • Annex E – Dealing with Disclosures of Abuse and Reporting Concerns • Annex F – Recruitment and Selection of Staff – Vetting & Barring Procedures • Annex G – Disclosure and Barring Service (DBS) Checks for New Students • Annex H – Admission of Students Under 18 years of age and Adults at Risk • Annex I – Support of Students Under 18 years of age • Annex J - External Agencies • Annex K – Management of declared Prevent vulnerabilities • Annex L – Local safeguarding procedures in place • Annex M – Useful links
External references	• Safeguarding Vulnerable Groups Act 2006 • Care Act 2014 • Mental Capacity Act 2005 • Counter-Terrorism Act 2015 • Children Act 1989 and 2004 • Working Together to Safeguard Children 2018 and 2023 • Care and Support Statutory Guidance 2020 • Office of the Public Guardian Safeguarding Policy • Keeping Children Safe in Education 2023 • British Council Care of Under 18s • Sexual Offences Act 2003
Links to other internal policies / procedures	• Prevent Duty • Whistleblowing Policy • Student Services – Safeguarding • Student Services - Crisis Protocols • Student Information and Disclosures ('Support Report Respect') • Personal Relationships at Work Policy • University Disclosure & Barring Service (DBS) Policy • Privacy Notices / Data Protection Policy • Recruitment of Ex-Offenders Policy • Preventing & Addressing Bullying, Harassment & Sexual Misconduct Policy
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Contents

PART A - Safeguarding Policy Statement 3

Introduction 3

Scope and Definitions 3

Safeguarding 3

Children and Adults at Risk 3

Regulated Activity 3

Our University's Commitments 4

Children 4

Adults at Risk 4

Application of the Policy 5

Policy Management 5

PART B - Prevent Duty 6

Susceptible to radicalisation or extreme viewpoints (Prevent) 6

PART C - Safeguarding Responsibilities and Procedures 6

Strategy 6

Responsibilities 6

Procedures 8

Reporting Concerns 8

Working with External Agencies 9

Annex A – Key Contacts 10

Annex B – Categories of Abuse 11

Annex C – Safeguarding Code of Conduct 12

Annex D - Flow chart on considering a student/apprentice concern 13

Annex E – Dealing with Disclosures of Abuse and Reporting Concerns 14

Annex F – Recruitment and Selection of Staff – Vetting & Barring Procedures 16

Annex G – Disclosure and Barring Service (DBS) Checks for New Students 17

Annex H – Admission of Students Under 18 years of age and Adults at Risk 18

Annex I – Support of Students Under 18 years of age 21

Annex J – External Agencies 23

Annex K – Management of declared Prevent vulnerabilities 24

Annex L – Local safeguarding procedures in place 25

Annex M – Useful links 26

PART A - Safeguarding Policy Statement

Introduction

1. Our University considers the safety and wellbeing of children and Adults at Risk to be paramount. We are committed to providing a safe environment for children and Adults at Risk who may be engaged in University activities for a variety of reasons.

2. This Policy and supporting procedures provide guidance to safeguard children and Adults at Risk. Additionally, this Policy enables the University to have due regard to 'the need to prevent people from becoming terrorists or supporting terrorism' (known as the 'Prevent Duty'). This Policy has been developed in accordance with the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) and the Care Act 2014.

3. The majority of students' or apprentices' safety, health and wellbeing concerns relate to welfare which would be dealt with in line with our Student Support framework, including our student incident protocols, consultancy and advice from the Student Wellbeing Team and 'Support Report Respect' approach.

Scope and Definitions

4. The University is not subject to legal safeguarding duties in the same way that schools, further education providers, local authorities and care provider are. However, the term 'safeguarding' is used to cover wider ethical or pastoral responsibilities where it may be possible to help to safeguard the welfare of children and Adults at Risk of abuse or neglect. Additionally, the University is an exempt charity, which carries responsibilities outlined in the Charity Act 2011.

Safeguarding

5. Safeguarding is to:
   - **protect the safety of children and Adults at Risk from abuse or neglect**
   - **promote their welfare**
   - **address and stop all incidents of harm and abuse**

Children and Adults at Risk

6. For the purpose of this Policy, **children** and **Adults at Risk of harm** (shortened to 'Adults at Risk') are defined as follows:
   - **Children** - any person under the age of 18 years
   - **Adults at Risk** - any person aged 18 or over, who:
     - Has needs for care and support (whether or not the local authority is meeting any of those needs); and
     - is experiencing or is at risk of abuse or neglect; *and*, as a result of those care and support needs, is unable to protect themselves against abuse or neglect, or the risk of it.

Regulated Activity

7. Regulated activities require an enhanced Disclosure and Barring Service (DBS) check to engage with children[1] or Adults at Risk before the start of relevant work or activities. The Department for Education (DfE) advise that regulated activity is likely to take place in relation to Higher Education in the following circumstances:
   - students on placements in some workplaces arranged by HEIs
   - HEI staff or students in carrying out paid or voluntary outreach work with schools

[1] Department for Education – see Regulated activity in relation to children: scope

- HEI staff or students through their academic research
- HEI staff working in HEI health centres or learning support units

Examples might include:
- caring for, being in charge of, or supervising a child or Adult at Risk;
- teaching, training, or instructing a child or Adult at Risk;
- giving advice or guidance to a child or Adult at Risk about their physical, emotional, or educational wellbeing;
- transporting a child or Adult at Risk in a vehicle.

Staff working in student residences will not be covered if care or supervision of students is not an expectation of their role.

Our University's Commitments

Children

8. In defining our approach towards children, the University draws on the definition used by the DfE in Keeping Children Safe in Education 2023 (KCSE). Whilst KCSE only applies to Schools and Colleges, the University will play our part in:
   - protecting children from maltreatment;
   - preventing impairment of children's mental and physical health or development;
   - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
   - taking action to enable all children to have the best outcomes.

Adults at Risk

9. Whilst the University is not subject to the provisions of the Care Act 2014, broadly this informs our approach to 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; and
   - ensure that the wellbeing of Adults 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.

10. Our University recognises the welfare of children and Adults at Risk as paramount and believes that all children and Adults at Risk have the right to protection from abuse. Categories of abuse are set out in Annex B. To safeguard children and Adults at Risk with whom we engage, our University will:
    (a) Implement a Safeguarding Code of Conduct for our University. This is set out in Annex C.
    (b) Implement a procedure (set out in Annex E) for dealing with safeguarding concerns, ensuring that there is a clear reporting (Annex D) and escalation route. This includes disclosures relating to Prevent vulnerabilities (set out in Annex K).
    (c) Implement appropriate procedures for the recruitment and selection of staff, volunteers and students for positions or activities which may entail contact with children and/or Adults at Risk. These procedures are set out, and referenced, in Annexes F and G.
    (d) Implement appropriate procedures for the admission and support of under 18s to our academic courses. These procedures are set out in Annexes H and I.
    (e) Provide appropriate training, support and supervision for staff and students engaged with children and/or Adults at Risk as part of their University roles.

11. The nature of some University activities requires local safeguarding procedures to be in place. These are documented with links to local procedures at Annex L.

Application of the Policy

12. This Policy applies to University staff, consultants, students[2], volunteers, employers and contractors who may come into contact with children and/or Adults at Risk as a result of activities or services organised by the University, unless the activity being undertaken is explicitly defined as falling under the jurisdiction of the safeguarding procedures of another organisation.

13. A non-exhaustive list of examples of activities and services, both on and off campus, includes:

    - Accommodation
    - Admission of students (for students under 18 years of ages as well as Adults at Risk)
    - Children accompanying members of staff or students to work
    - Clinical or health centre settings
    - Events or conferences run by the University
    - Field trips, excursions, volunteering and other social activities at both the University and via the Students' Union
    - Outreach activities
    - Placements
    - Recruitment on or off campus
    - Research
    - Sport-related activities
    - Summer schools, school visits, and other events
    - Support and counselling
    - Talks and lectures delivered by external speakers on campus
    - Teaching, supervision and training
    - Work experience and employment

14. All staff and students whose roles and responsibilities include regular contact with children or Adults at Risk must ensure that they have read, understood and comply with this Policy and any associated procedures.

15. Where third parties are using University premises, it remains their responsibility to ensure that safeguarding procedures are in place. In other instances, for example if staff, students or visitors bring children or Adults at Risk onto University campus, they remain the responsibility of the parent/guardian or designated custodian.

16. Any concerns regarding the implementation of this Policy should be reported to the Registrar & Secretary.

17. The University's Whistleblowing Policy can be used for raising concerns within its scope.

Policy Management

18. This policy will be reviewed every two years by the Registrar & Secretary's Office. Any proposed amendments or changes will be put to the University Executive Team for approval. This Policy shall be published on the University's website.

[2] This includes apprentices registered on University's degree apprenticeship programmes.

PART B - Prevent Duty

Susceptible to radicalisation or extreme viewpoints (Prevent)

19. Our University recognises its duty under the Counter-Terrorism Act 2015 and related guidance to have due regard to 'the need to prevent people from becoming terrorists or supporting terrorism'. The University has put in place reasonable measures to safeguard and support people who may be susceptible to radicalisation which may lead to the harm of self, others, or property. Our University engages in the Prevent partnership in the City, as well as with the Regional Prevent Co-ordinator for Further and Higher Education in the sector to ensure appropriate procedures, risk assessments and staff training are in place.

20. The University's delivery of our obligations under the Prevent Duty are aligned with safeguarding and welfare procedures so that concerns and early signs of potential vulnerabilities to being drawn into terrorism can be identified and enable the most appropriate support to be provided. The process for managing disclosures relating to Prevent vulnerabilities is set out in Annex K. In carrying out the Prevent Duty, the University is mindful of other legal obligations regarding data protection, freedom of speech and through the Equality Act 2010.

21. The University is required to complete an annual return signed by the Board of Governors and submitted to the Office for Students (OfS). The Audit Committee oversees and receives assurance on the adequacy of the University's policies and procedures in respect of the Prevent Duty.

22. Where there is reason to believe that a student to whom this policy applies may be at risk of being drawn into terrorism, concerns should be referred to the **Institutional Prevent Lead**[3].

PART C - Safeguarding Responsibilities and Procedures

Strategy

23. Our University's responsibility is to develop Policy, procedures, and guidance, alongside provision of training to support appropriate staff and students in safeguarding children and Adults at Risk with whom they engage. The Vice Chancellor designates a senior member of staff as the Nominated Officer responsible for the strategic leadership of this Policy, for its implementation, review, and development.

24. The Nominated Officer is the **Registrar & Secretary**. This Policy and its associated procedures will be reviewed every two years or, more frequently to take account of any legislative changes or changes in the University's activities. Any proposed revisions to the Policy will be put to the University Executive Team for approval.

Responsibilities

25. The following sets out the roles and responsibilities of individuals under our Safeguarding Policy:

Role	Responsibilities
Nominated Officer	• The Nominated Officer is responsible for the strategic leadership of our University's safeguarding practice and for creating a network of safeguarding contacts across the University who will implement this Policy and related guidance. • The Nominated Officer will ensure that appropriate policies and procedures are in place to ensure the safeguarding of children and Adults at Risk, ensuring relevant staff have

[3] Where required, the Registrar & Secretary may determine that the matter should be referred to the University Executive Team for consideration as an Office for Students' **Reportable Event**.

Role	Responsibilities
	appropriate training and also creating links with appropriate local safeguarding agencies. The Registrar & Secretary's Office will maintain confidential records of cases and action taken. • Where a safeguarding concern is raised, the Nominated Officer or their representative acting as a Deputy, will make an initial assessment of the matter, consulting with the local authority designated officer and make any formal referrals to the appropriate investigating agency as required.
DSO and SPoC	• Designated Safeguarding Officers (DSO) and Local Safeguarding Point of Contacts (SPoC) (as set out in Annex A) act as a first point of contact for anyone who has concerns or queries about a child or Adult at Risk's safety. The DSO / SPoC should take appropriate records of incidents and report any concerns to the Nominated Officer. • DSOs and SPoCs are required to complete specific training on safeguarding and the Prevent Duty and champion best practice relating to safeguarding and attend the Student Safeguarding and Safety Group.
Staff	• All University staff are responsible for ensuring that, through their behaviour, whether on or away from University premises, children and Adults at Risk are not placed at a risk of harm. All staff are required to beware of and comply with the expectations of behaviour set out in this Policy (specifically the Safeguarding Code of Conduct set out in Annex C), any specific guidance issued by the University from time to time and the University DBS Policy and Guidelines where appropriate. • Staff should know how to escalate matters relating to safeguarding and report any safeguarding concerns in accordance with this Policy. • Where staff will be engaging in regulated activity with children or Adults at Risk as part of their role, the University will ensure that staff complete a DBS check in advance of any such activity. • Some front facing staff will be identified to completed specific training on safeguarding. • Staff organising University-approved activities involving children and Adults at Risk, must make reasonable efforts to ensure that parents/carers receive information about the activities and give permission for the individual's participation where appropriate or that, where the activity is organised for a group of children from a school, college or other organisation, the school, college or organisation is aware of the University's expectations and has in place risk assessments with clear responsibility for safeguarding.
Deans / Directors	Deans of Schools and Directors of Professional Services must ensure that all activities in their areas involving children or Adults at Risk are in accordance with this Policy and associated procedures. Where the nature of some activities requires, local safeguarding procedures shall also be in place and aligned to this Policy. Where required, local Safeguarding Contacts (DSO/SPoC) shall be nominated by the Dean / Director.
Students and apprentices	• Students and apprentices will be provided with accessible information about safeguarding. Students who may come into contact with children and Adults at Risk on University premises or in connection with University business, must also ensure that their behaviour is compliant with this Policy and associated guidance. This applies particularly to students on programmes to whom activity-specific guidance may be issued, and to students taking part in activities with children organised by the University. • Students should report any safeguarding concerns in accordance with this Policy.
Contractors	Contractors must ensure that their behaviour towards children and Adults at Risk is appropriate and does not breach any specific codes of conduct issued by the University. Contractors must ensure that their actions do not prejudice the health and safety of children or Adults at Risk or put them at risk of harm. Where the University lawfully requires them to do so, contractors must also comply with vetting requirements, including criminal record disclosures.
Apprenticeship Employers	Schools offering apprenticeship programmes must maintain open communications with employers regarding the safety and wellbeing of apprentices and ensure that those they work with are aware of their safeguarding and Prevent Duty obligations, with support from the Degree Apprenticeship Team and safeguarding contacts where appropriate.

Procedures

26. Procedures and guidance are further detailed in the Annexes of this Policy.

Admission of under 18s and Adults at Risk	The University has appropriate procedures for the admission and support of under 18s and Adults at Risk to our academic courses, set out in Annexes H and I. Under ESFA funding rules, the University is **not** permitted to allow any under 18 to join an apprenticeship programme.
DBS checks	Students who undertake programmes of study or placements which involve regulated activity with children or Adults at Risk are required to complete a DBS check. Annex G sets out the process for courses where a DBS check is required.
Research	No research using (or otherwise engaging) children or Adults at Risk circumstances, or where topics fall within the Prevent Duty, may be carried out without the consideration of the **Research Ethics Sub-Committee** and Directors of Research. The relevant Director of Research shall be responsible for ensuring that a satisfactory written risk assessment is completed and that control measures specified therein are carried out.
Events and activities	For activities involving children or Adults at Risk there may be added health and safety risks. A Health and Safety assessment template, available from **Safety, Health and Wellbeing**, should be used to capture risks. Risk assessments should not be used to assess individual cases of alleged or suspected harm. Disclosures should be referred through the appropriate channels, as outlined in this Policy.
Employment and work experience	A written risk assessment shall be completed by the relevant Dean of School or Director of Service before any child or Adult at Risk is employed by the University or offered 'work experience'. This should be in accordance with the provisions of the relevant HR policies. Annex F outlines the recruitment and selection of staff and Vetting & Barring Procedures.

Reporting Concerns

27. **In a situation where there is an immediate threat to life, do not delay contacting the emergency services by calling 999.**

28. Any student or apprentice-related concerns may be reported using the **online reporting form** or immediate concerns through the University's Student Wellbeing Team: 0113 812 8507 or studentwellbeing@leedsbeckett.ac.uk. Outside hours concerns should be directed to Security (who are available 24/7 on 0113 812 3165) to determine whether the concern constitutes a safeguarding matter or is better handled as a wellbeing concern. The Student Wellbeing Team will alert the Nominated Officer were required.

29. Seek further advice from your Safeguarding Officer or your Local Safeguarding Point of Contact at the University.

30. Safeguarding matters will then be brought to the attention of the **Nominated Officer**. The Nominated Officer (or deputy) will then invoke the reporting procedure as set out in Annex E.

31. The University has **Privacy Notices** which detail that data held by the University may be used to protect data subjects' vital interests. The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) supports the sharing of relevant information for the purposes of keeping children and Adults at Risk safe. It is noted that our University's reporting obligations will override any data protection obligations; therefore, if the University has concerns regarding any child or Adult at Risk, we reserve the right to make a report to the Disclosure and Barring Service or other agency that includes any necessary information regarding any student or staff member involved.

Working with External Agencies

32. Our University will not investigate concerns directly but rather will refer these concerns to relevant external agencies in accordance with the reporting procedures set out in Annex E. Our University will work with relevant agencies to ensure that it provides a high standard of advice and support to its staff with responsibilities for safeguarding. Reports to external agencies will normally be made by the **Nominated Officer (or deputy)**.

Annex A – Key Contacts

Reporting Safeguarding Concerns

- **Immediate risk to life**: If there is an immediate threat to life, contact 999 without delay. Please also inform Security that the emergency services have been contacted.

- **Student or apprentice-related concerns**: Report concerns using the online reporting form. For concerns requiring an immediate response, contact the Student Wellbeing Team on 0113 812 8507 or at studentwellbeing@leedsbeckett.ac.uk.

  Outside normal working hours, concerns should be directed to Security, who are available 24/7 on 0113 812 3165; Security will assess whether the concern constitutes a safeguarding matter or would be more appropriately managed as a wellbeing concern.

  Where required, the Student Wellbeing Team will notify the relevant Student Lead, who will initiate the appropriate reporting procedures.

- **Other safeguarding matters**: Any other safeguarding concerns should be brought to the attention of the Nominated Officer.

- Further advice and guidance: You can also seek advice from your Safeguarding Officer or Local Safeguarding Point of Contact.

A list of key safeguarding contacts can be accessed via the link below:

https://www.leedsbeckett.ac.uk/-/media/files/policies/safety-health-and-wellbeing/uphs_safegaurding_key_contacts.pdf

Annex B – Categories of Abuse

Abuse and neglect can take many forms[4]. We should not be constrained in the view of what constitutes abuse or neglect and should always consider the circumstances of each individual case.

Abuse and neglect can fall into the following categories:

- Physical
- Domestic
- Sexual[5]
- Psychological
- Financial or material
- Modern slavery
- Discriminatory
- Organisational
- Neglect and acts of omission
- Self-neglect

Signs and indicators of abuse and neglect

See:

- For children: NSPCC – spotting the signs of child abuse
- For adults: SCIE – signs and indicators of abuse

[4] See definition: section 14.17 **Care and Support Statutory Guidance 2020**, and section 9.4 **national guidance, SD8: Office of the Public Guardian Safeguarding Policy**

[5] The Sexual Offences Act 2003 states that any person in a **Position of Trust** engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even though legal age of consent is 16). A 'Position of trust' (section 22, the Sexual Offences Act 2003) is explained as an adult "caring for, training, supervising or being in sole charge" of an under 18-year-old.

Annex C – Safeguarding Code of Conduct

All staff are required to demonstrate exemplary behaviour in order to maintain high professional standards and act as role models. Such behaviour also has the advantage of protecting staff from allegations of misconduct. Similarly, students of our University, volunteers and contractors are expected to conduct and protect themselves properly and effectively when they are in the presence of children or Adults at Risk.

Good practice in this regard is demonstrated by:

- treating all children and Adults at Risk equally and with respect and dignity
- conducting yourself in a manner that sets a good example to children and Adults at Risk
- trying to work in an open environment and avoiding being alone with a child or Adult at Risk, maintaining a safe and appropriate distance with children and Adults at Risk, avoiding physical contact which, however well-intentioned, may be misinterpreted
- never using physical force against a child or Adult at Risk, unless it constitutes reasonable restraint to protect her/him or another person or to protect property
- never using physical punishment
- keeping a written record of any incident or injury sustained by a child or Adult at Risk
- referring any problems or concerns to a designated point of contact or to the Nominated Officer
- questioning any unknown adult who attempts to engage with a child or Adult at Risk on University premises or in off-campus University activities
- never making sexually suggestive comments to anyone
- never allowing allegations made by a child or Adult at Risk to go unchallenged, unrecorded or not acted upon
- avoiding taking responsibility for tasks for which you are not trained or which a child or Adult at Risk can do for themselves

It is also worth considering the appropriateness of contact and communications with children and Adults at Risk by the sharing social media profiles, emails, group messages, personal phone numbers, etc.

Annex D - Flow chart on considering a student/apprentice concern

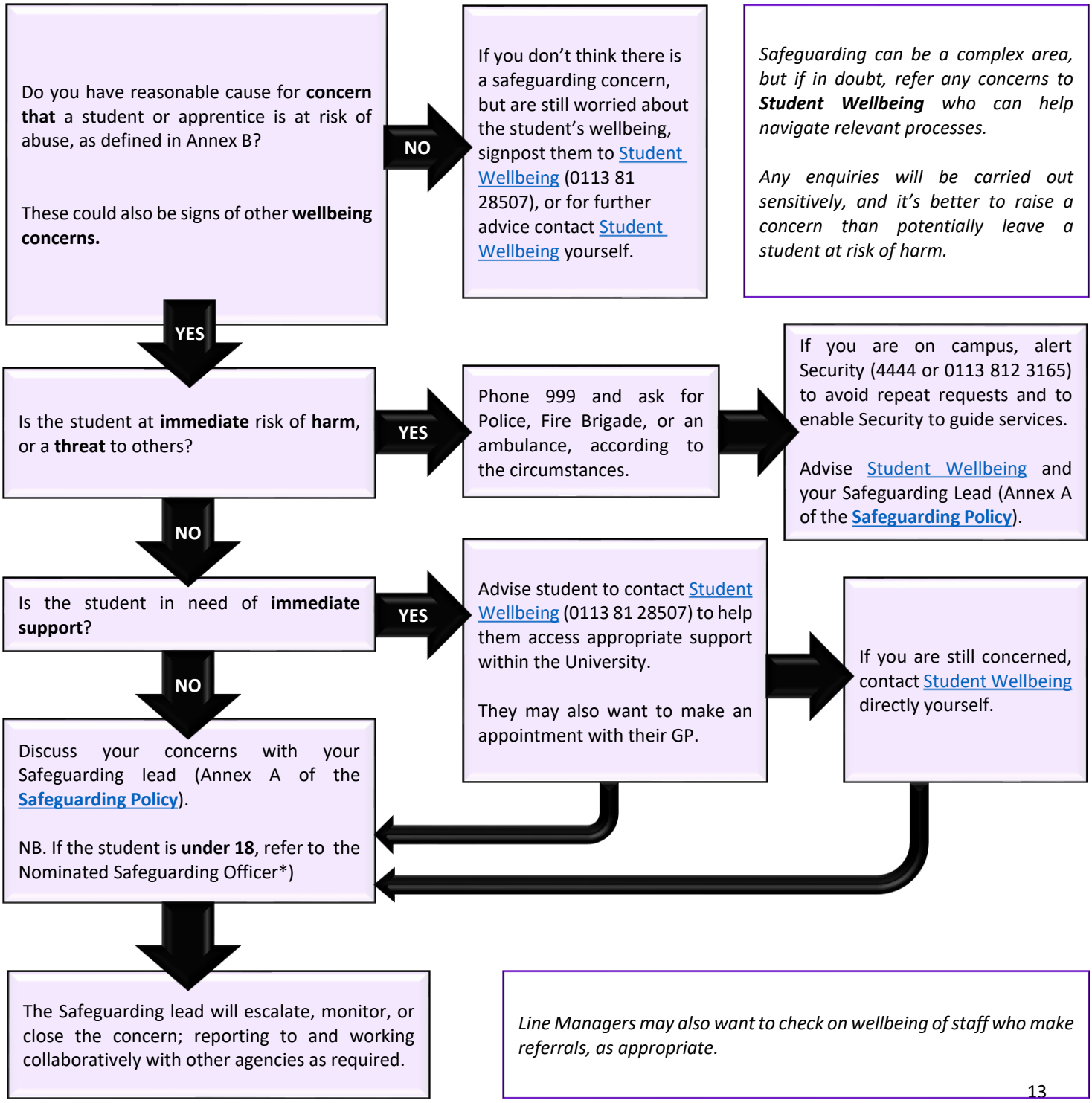
Most student concerns won't meet the definition of safeguarding – this appendix will help colleagues to navigate through relevant support if they're not clear.

DO: (see Annex E)

- **Remain calm**
- **Put your safety first**
- **Contact emergency services without delay if there is an immediate risk to life**
- **Ask for advice or escalate concerns where necessary**
- **Familiarise yourself with our Safeguarding Policy**
- **Listen and collect sufficient information, in writing, about the situation to support others in making an assessment**

DON'T:

- **Promise confidentiality – you may have to alert others in order to keep the student safe**
- **Assume that the signs below always point to a safeguarding concern, take the whole situation into account**



The University's Safeguarding Nominated Officer can be contacted at Governance@leedsbeckett.ac.uk

Annex E – Dealing with Disclosures of Abuse and Reporting Concerns

Dealing with Disclosure

If a child or an Adult at Risk tells a member of staff (or a student or third party) about possible abuse:

- listen carefully and stay calm;
- make sure you have understood the matter under discussion, clarifying points if necessary;
- reassure the individual that by telling you, they have done the right thing;
- inform the individual that you must pass on the information now but only to those who need to know, informing them who you are going to tell;
- take a **written note** of the main points of conversation including names, times, dates, etc., together with any injuries observed – where possible, it is important to **record in the discloser's own words**;
- report the conversation immediately to the Nominated Officer or a relevant point of contact (listed in Annex A). **The Nominated Officer will hold written records.**

Students and members of staff should **not** attempt to investigate concerns or allegations themselves.

Reporting Concerns

Any student or apprentice-related concerns/suspicions/disclosures may be reported using the **online reporting form** or immediate concerns through the University's Student Wellbeing Team: 0113 812 8507 or studentwellbeing@leedsbeckett.ac.uk. Outside hours concerns should be directed to Security (who are available 24/7 on 0113 812 3165) to determine whether the concern constitutes a safeguarding matter or is better handled as a wellbeing concern. The Student Wellbeing Team will alert the Nominated Officer once concerns have been screened.

In a situation where there is an immediate threat to life, do not delay contacting the emergency services by calling 999.

The Nominated Officer (or deputy) is responsible for reporting concerns/suspicions/disclosures to the appropriate investigating agency and agreeing any further action which may be necessary. If it is agreed with the investigating agency that a formal referral should be made, this will be followed up in writing within 24 hours, using the agency's pro forma where available.

In the event of the unavailability of the Nominated Officer, one of the named deputies (Annex A) may report to the appropriate investigating agency.

The appropriate investigating agency will be, in the first instance, the local authority responsible for the area where the individual lives, or in the case of potential radicalisation the local Prevent Officer. Contact details are set out in Annex J.

Dealing with Allegations of Abuse Against University Staff

Our University recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that those investigations are thorough and not subject to delay.

The University does not tolerate bullying, harassment or sexual misconduct and will use relevant policies and procedures developed for this purpose to manage any allegations made in this regard.

A member of staff who receives an allegation about another member of staff should follow the guidelines

above for dealing with a disclosure.

The Nominated Officer will make an initial assessment of the matter, consulting with the local authority designated officer (LADO) if appropriate. If this consultation results in a formal referral, then the matter will be investigated by the appropriate local agency and our University shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed. To do otherwise may prejudice the investigation. Any internal enquiries shall comply with our University's Staff Disciplinary Procedure.

The Nominated Officer will consult with the police or other investigating agency and shall inform the following parties of the investigation:

- The individual who made the disclosure and their parent/guardian (if appropriate)
- Via the Director of HR, the member of staff against whom the allegation has been made (if appropriate)
- The Chair of the Board of Governors (if appropriate)

The Nominated Officer shall keep a **written record** of the action taken in connection with the allegation and inform the Vice Chancellor of relevant matters relating to the case.

Suspension of the member of staff concerned may be considered at any stage of the investigation but should not be automatic. Prior to making the decision to suspend, the Vice Chancellor (or nominee) should interview the member of staff. This should take place with the approval of the appropriate investigating agency. Where a member of staff is suspended, the Vice Chancellor (or nominee) shall inform the Chair of Governors, the parents/guardian of the individual who has made the allegations, and senior staff on a 'need to know' basis. Consideration shall be given to informing the individual who made the allegation. The suspension shall remain under review in accordance with our University's Staff Disciplinary Procedure.

Following the outcome of the external agency investigation, the University may instigate its Staff Disciplinary Procedure if appropriate. If a member of staff is dismissed or resigns before the disciplinary process is completed, she/he should be informed about the University's duty to inform the Disclosure and Barring Service or other agency of any concerns.

Where an allegation has been made against a member of staff, the Nominated Officer shall, at the conclusion of the disciplinary process, consider whether there are any matters arising from it that could lead to the improvement of the University's procedures and/or policies which should be drawn to the attention of the relevant local authority. Consideration shall also be given to the training needs of staff.

Dealing with Allegations of Abuse Against University Students

The provisions of Annex E of this Policy shall also apply to students of our University. This shall include student volunteers. The relevant disciplinary procedure shall be the Student Code of Conduct. Students against whom allegations have been made will be advised to contact the Students' Union for advice/representation. On the question of suspension, the Deputy Vice Chancellor (or nominee) shall consider whether it is necessary to suspend the student from all or a specific set of our University activities (e.g., placement).

Our approach to dealing with allegations of bullying, harassment and sexual misconduct is set out in the Preventing and Addressing Bullying, Harassment and Sexual Misconduct Policy.

Annex F – Recruitment and Selection of Staff – Vetting & Barring Procedures

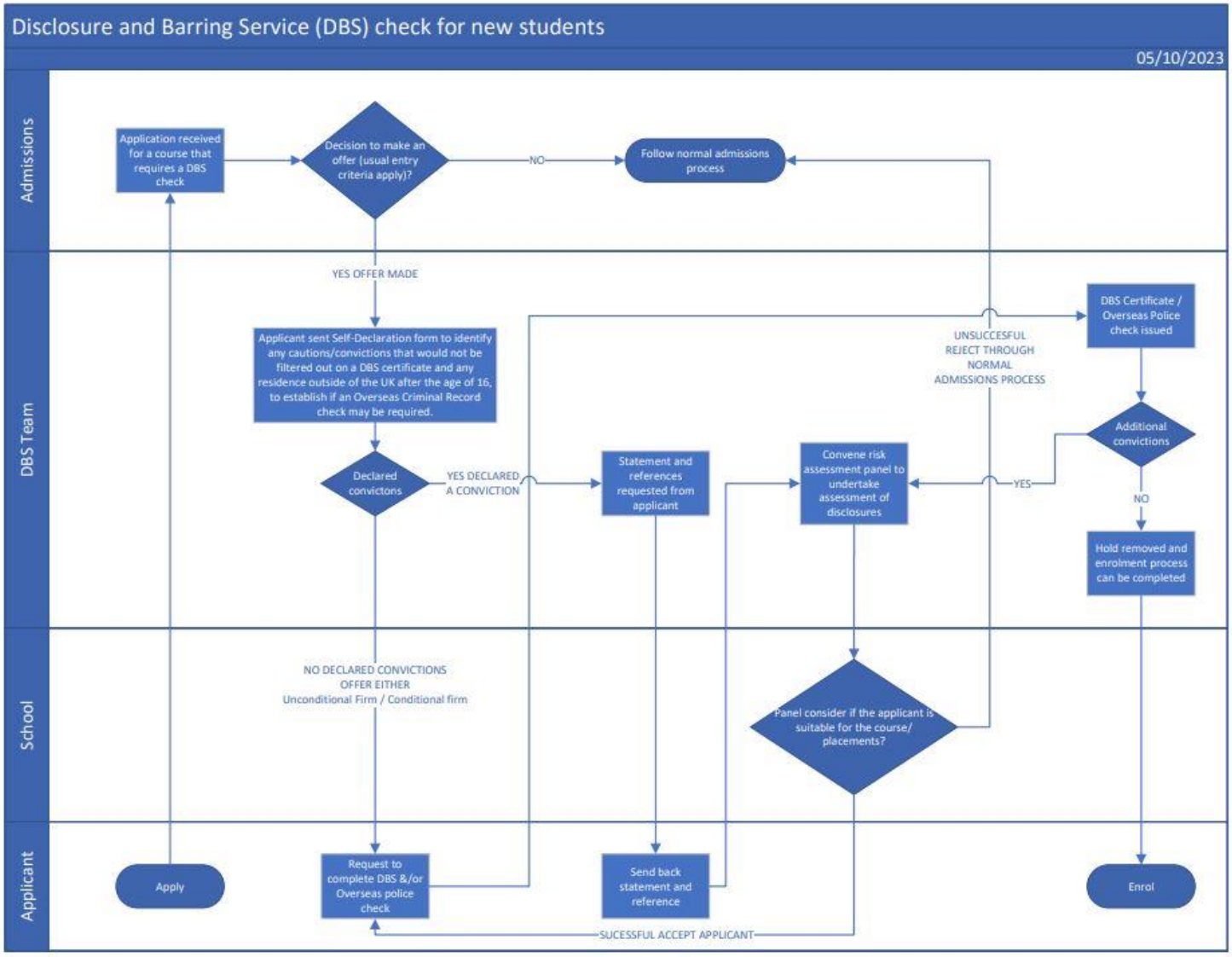
Our University has in place a formal policy and procedure for the recruitment and selection of staff, supported by our University's Disclosure and Barring Service (DBS) Policy and Guidelines and Recruitment of Ex-Offenders Policy. These policies are available on the University webpages:

- Disclosure and Barring Service Policy and Procedure
- Recruitment of Ex-Offenders Policy

In particular, the Disclosure and Barring Service Policy and Guidelines provide information on the identification of posts where the employee will work with or have the potential to work with children and/or Adults at Risk in regulated activity and the recruitment process for such posts.

Annex G – Disclosure and Barring Service (DBS) Checks for New Students

This process applies only to courses where the need for a DBS check has been approved by the School and communicated as part of the course approval process, ahead of the application cycle to the Admissions DBS Team for assessment and set up.



Although a DBS check may not be necessary for admission to some courses, the choice of particular optional modules may necessitate a DBS check where the placement includes regulated activity. In such cases, the Safeguarding point of contact in the relevant School is responsible for ensuring a placement does not commence before DBS checks are received.

Annex H – Admission of Students Under 18 years of age and Adults at Risk

Introduction
Each year, a small number of students **under the age of 18** apply to join our University[6]. This Policy sets out our approach on the admission of such students. It is unlikely that an **Adult at Risk** would seek admission to the University, however, in that event, similar considerations regarding safeguarding arrangements would apply.

Degree Apprentices
Under ESFA funding rules, the University is **not** able to allow any students under 18 to join an apprenticeship.

17-year-olds
Our general approach in considering the admission of students aged 17 at the time of application is not to refuse entry on the grounds of age unless the appropriate safeguards cannot be put in place. The Admissions team will be authorised to make offers to these students. Such offers are conditional and may be revoked if the necessary safeguards are not available, pursuant to our Safeguarding Policy. There are certain courses we cannot admit 17 years to due to Professional, Statutory and Regulatory Bodies (PSRB) requirements. These are:

- BSc (Hons) Adult Nursing
- BSc (Hons) Mental Health Nursing
- BSc (Hons) Dietetics
- BSc (Hons) Speech & Language Therapy
- BSc (Hons) Occupational Therapy
- BA (Hons) Social Work
- BSc (Hons) Physiotherapy
- BA (Hons) Primary Education (Early Years 3-7) with recommendation for QTS
- BA (Hons) Primary Education (5-11) with recommendation for QTS
- BSc (Hons) Nutrition can accept students who are 17 at the start of the course but must be18 years old by 31st December in the year after the course start date (this is due to attendance on placement commencing later than the above courses).

Applicants aged under 16
There are a number of important legal distinctions that apply under the age of 16, and therefore we would not normally enter into direct contractual relationships with anyone under that age.

Consideration will be given on a case-by-case basis with a final decision made by the Registrar & Secretary. Circumstances to be taken into account in reaching such a decision will include frequency and method of delivery. Offers would **not** be made to students aged under 16 until approval was received from the Registrar & Secretary.

Parental / Guardian consent
For all students aged under 18 at the point of enrolment, parental / guardian consent will be sought and must be forthcoming before enrolment can be permitted. Such parental consent will not negate the student's right to privacy under, inter alia, Data Protection laws nor will it reduce our University's burdens and responsibilities under law).

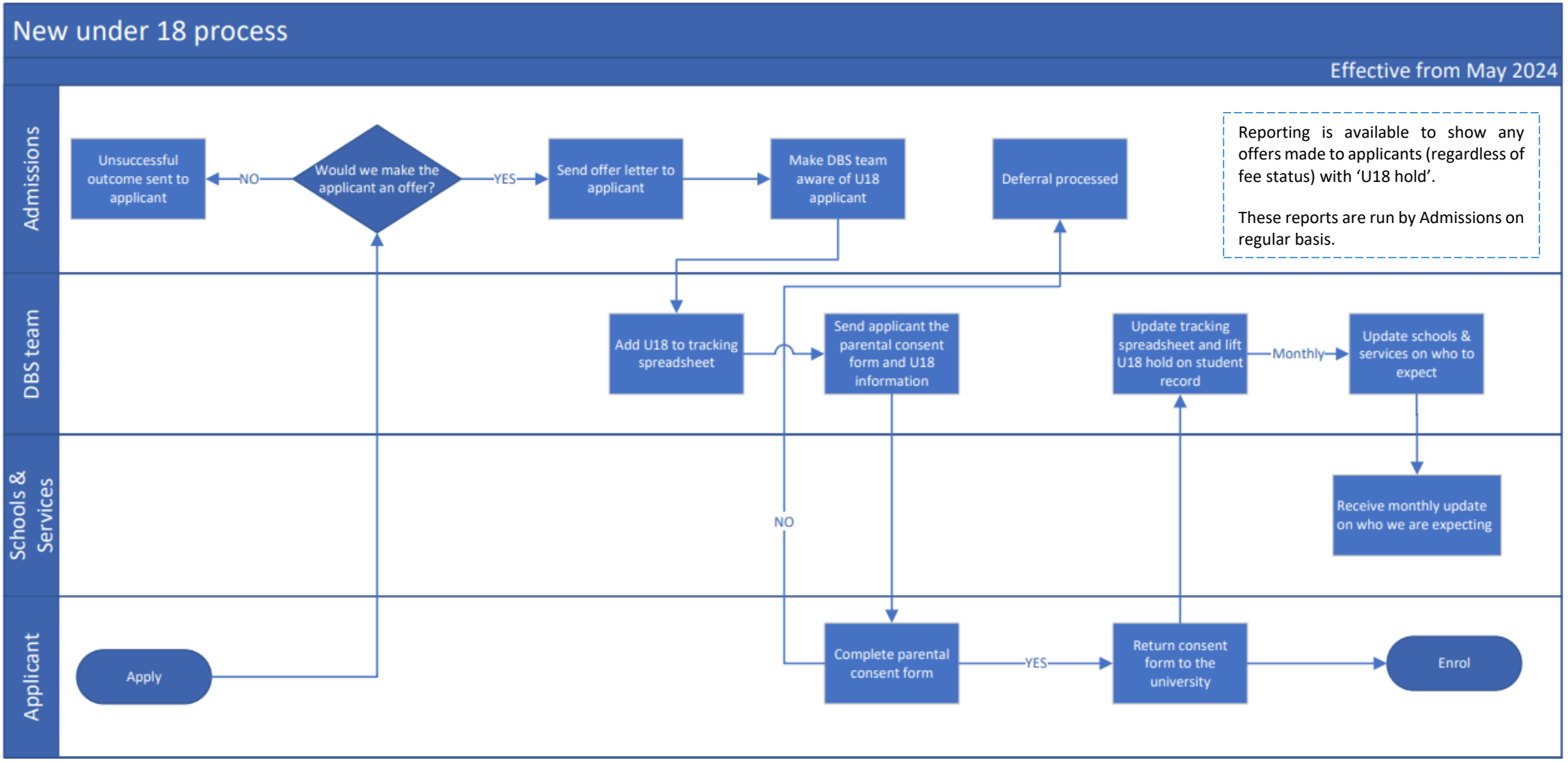
In some cases, we may require a parent or guardian to act as guarantor to any contractual or other arrangements entered into by a student who will be aged under 18 at the point of admission.

[6] Physiotherapy, Dietetics, Speech & Language Therapy, Adult Nursing, Mental Health Nursing and Social Work are excluded as these courses cannot admit students under the age of 18 due to placement restrictions.

Treatment of students aged under 18 after enrolment

The University will not accept parental responsibility for any child enrolled on any course at the University.

The Safeguarding Policy will apply whilst any student is studying at our University below the age of 18, although the University will not actively seek to treat such students differently from the rest of the student population. In any event, particular consideration must be given with regard to University residential accommodation, the sale or consumption of alcohol under English Law, etc.



Additional checks include: Whether the course has a residential trip during the period where the student is aged under 18 or for an Adults at Risk; whether Academic Advisers and/or other key staff have a DBS check in place; etc.

Consultation to take place with Student Services, Accommodation and Course team, as appropriate.

Annex I – Support of Students Under 18 years of age

Our University will not accept parental responsibility for any student under the age of 18 enrolled on any course and will not actively seek to treat such students differently from the rest of the student population. However, our University recognises its enhanced duty of care for this student group and sets out the following guidelines regarding the support of students who are under 18.

Consent Form
A consent form signed by the parent / guardian must be in place before enrolment can take place, confirming their acceptance of the arrangements in place for under 18s**.** Once the student reaches the age of 18, these accepted terms will automatically be regarded as agreed by the student.

Accommodation
All students who are under the age of 18 at the start of their course and are not planning to reside at their family home, should be advised to apply for a place in accommodation owned or managed by Leeds Beckett University, for whom a parent or guardian must sign the tenancy agreement.

Wherever possible, students who are under 18 will be housed together in shared accommodation; however, some facilities, e.g., kitchen areas, may be shared with adults. Residential Officers must be notified of under-18s in their residences and should meet with these students regularly (normally at least weekly) to check on their welfare.

Disclosure and Barring Service (DBS) checks
The University will take all reasonable steps to ensure that persons who are unsuitable to work with children and Adults at Risk are prevented from doing so. The University is registered with the DBS and will conduct checks as appropriate in accordance with relevant legislation and the University's procedures published on its website.

Support
All students who are under 18 must have a named contact in the relevant School who will take responsibility for monitoring their wellbeing; this will normally be their Academic Adviser. Under 18s can access the full range of support from Student Services, as all staff who work on a one-to-one basis with students are subject to an enhanced Disclosure and Barring Service check. Course Directors with a number of under 18 students in their entry cohorts are asked to complete a risk assessment in advance of the commencement of the course.

Safety and Security
Student safety considerations are paramount for all Leeds Beckett students. However, it is recognised that under-18s, and especially international students who are under 18, have additional levels of vulnerability for which our University has a duty of care. Orientation/induction sessions for under 18s, with the Safer Student Police Officer assigned to Leeds Beckett will be arranged at the start of all programmes which have a high proportion of under-18s. These sessions will cover aspects of personal safety and security, as well as key aspects of UK law and culture. The Officer is also available to speak to individuals or groups where there are safety / security concerns. Under 18 students are all given details of the 24-hour emergency contact number.

http://www.leedsbeckett.ac.uk/studenthub/security/

Health
All students should be actively encouraged to register with a local GP. Further information is available at https://www.leedsbeckett.ac.uk/student-information/student-wellbeing/looking-after-your-physical-health/

Emergency Contact details
All Leeds Beckett students must provide emergency contact details.

In addition, under 18s must provide emergency contact details of an adult living in the UK. If, however they do not have a contact in the UK, who is willing and able to act as a guardian then there are agencies who will, for a fee, make arrangements for them. The Association of Educational Guardians for International Students (AEGIS) inspects and provides accreditation to guardianship organisations in the UK in line with current UK legislation.

www.aegisuk.net

Residentials
In most instances, students will not be able to participate in any residential component to their course until they are 18, unless explicit consent is given by parents / guardians.

Social events / interaction
Staff with under 18s in their cohort should be mindful of social interactions and activities as part of the course may engender more risks for this age group, e.g., meetings in licensed establishments and the risks associated with the mixing of younger students with adults.

Annex J – External Agencies

NSPCC (for advice, guidance and training on safeguarding matters)	0808 800 5000
Social Care Duty and Advice Team (for Nominated Officer to report concerns)	
Leeds – Children's	
Office Hours	0113 222 4403
Out of hours Emergency	0113 240 9536
Leeds – Adults	0113 222 4401
Bradford – Children's	
Office Hours	01274 437500
Out of hours Emergency	01274 431010
Bradford – Adults	01274 431077
www.bradford.gov.uk/makeanalert	
Police (for urgent action if a child or vulnerable adult is at immediate risk from any form of abuse)	999
Prevent Leeds (for discussion of non-emergency concerns of radicalisation) Nadeem Siddique, Prevent Co-ordinator, Leeds City Council	0113 535 0810 (Monday to Friday, 8am to 4pm) prevent@leeds.gov.uk

Annex K – Management of declared Prevent vulnerabilities

Disclosures relating to Prevent Vulnerabilities

1. Disclosures relating to Prevent vulnerabilities will be handled in line with the University's Safeguarding Policy and procedure – see in particular annex K.

2. Disclosures should be made in confidence to the Prevent Lead (or Deputy) who will consult with the Nominated Safeguarding Officer on an appropriate course of action.

3. Sharing of information will be strictly on a 'need to know' basis, based on the risks identified and actions required (see under point 4 below).

4. Planned actions will take account of:

    - The vulnerabilities of the student or staff member concerned
    - The likely risk of the individual to members of the Leeds Beckett community, taking account of the role (in the case of a staff member) or the course of study (in the case of a student). Any risk assessment will be informed by information provided by the Police or other external agency.
    - The relevance of other procedures to the case (e.g., DBS requirements and declarations; Student Code of Conduct; Staff Disciplinary Policy and procedure).

5. In the event of a student case, a case consultation may be called to inform an agreed course of action taking account of input from external agencies, the course team, student services, accommodation, student casework and the Prevent lead.

6. In the event of a staff case, a case consultation may be called to inform an agreed course of action taking account of input from external agencies, Human Resources and the Prevent lead, and other relevant parties (e.g., Occupational Health).

7. Decisions will be documented.

Annex L – Local safeguarding procedures in place

The nature of some University activities requires local safeguarding procedures to be in place. These are documented with links to local procedures below:

- Beckett Sport Safeguarding Policy
- Carnegie School of Sport - Applied Services - DEXA body-composition scanner (in development in School)
- Carnegie School of Sport - Health and Human Performance Hub Safeguarding Policy
- School of Humanities & Social Sciences - Speech and Language Therapy Clinic
- Business Engagement – Beckett Careers Under 18's Safeguarding Procedures and apprentice induction material

Please contact Governance@leedsbeckett.ac.uk for any support needs in drafting new or reviewing existing local safeguarding policies and procedures.

Annex M – Useful links

External references	• Care Act 2014 • Care and Support Statutory Guidance 2020 • Charity Act 2011 • Children Act 1989 and 2004 • Counter-Terrorism Act 2015 • Data Protection Act 2018 • Equality Act 2010 • Health & Safety at Work Act 1974 • Higher Education (Freedom of Speech) Act • Higher Education and Research Act 2017 (as set out in the OfS Regulatory Framework) • Keeping Children Safe in Education • Mental Capacity Act 2005 • Office of the Public Guardian Safeguarding Policy • Online Safety Act 2023 • Rehabilitation of Offenders Act 1974 • Safeguarding Vulnerable Groups Act 2006 • Serious Crime Act 2015 • Sexual Offences Act 2003 • Working Together to Safeguard Children
Links to other internal policies / procedures	• Disclosure and Barring Service (DBS) Policy / Criminal Convictions and Disclosure Policy • Personal Relationships at Work Policy • Prevent Duty • Preventing and Addressing Bullying, Harassment and Sexual Misconduct Policy for Staff • Preventing and Addressing Bullying, Harassment and Sexual Misconduct Policy for Students • Privacy Notices / Data Protection Policy • Recruitment of Ex-Offenders Policy • Student Information and Disclosures ('Support Report Respect') • Student Services - Crisis Protocols (staff only) • Student Services – Student Wellbeing • Whistleblowing Policy