

UNIVERSITY OF BOLTON SAFEGUARDING POLICY AND PROCEDURES: CHILDREN AND ADULTS AT RISK (PREVIOUSLY VULNERABLE ADULTS)

SAFEGUARDING

1 Introduction

- 1.1 The University of Bolton (**University**) Board of Governors has formal responsibility for the safeguarding of children and adults at risk (previously vulnerable adults) and for ensuring that this policy complies with the University's legal obligations, and that all those under the University's control comply with it. The Board of Governors have appointed a member to the role of Nominated Safeguarding Lead who, together with the Registrar (Senior Designated Executive Safeguarding Lead) and Assistant Vice-Chancellor (Transformation) (Designated Executive Safeguarding Lead), will act on their behalf to ensure that all members, students and employees of the University comply with the requirements of this policy.

2 Safeguarding and protecting people

- 2.1 Safeguarding is the protection of people from harm. It includes the protection of children and adults at risk of harm and the prevention of those who are deemed unsuitable to work with them from doing so.
- 2.2 The University will take reasonable steps to ensure that its students and others who come into contact with the University, including children and adults at risk, do not, as a result, come to harm or are exposed to abuse and will be alert to and act upon situations where they may be caused harm.
- 2.3 The University acknowledges that it has statutory duties relating to the safeguarding of children and adults at risk, namely:
- 2.3.1 In respect of children (including everyone under the age of 18):
- (i) protecting children from maltreatment;
 - (ii) preventing impairment of children's health or development;
 - (iii) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - (iv) taking action to enable all children to have the best outcomes.
- 2.3.2 In respect of adults at risk:
- (i) protecting their right to live in safety and free from abuse and neglect, where as a result of their care and support needs they are unable to do so themselves.
- 2.4 The University has a zero-tolerance approach to any forms of potentially harmful behaviour.

2.5 The University whilst not a health and care provider recognises the importance of and acts in accordance with the six principles of safeguarding first introduced by the Department of Health in 2011 but now embedded in the Care Act, these being:

- Empowerment – People being supported and encouraged to make their own decisions and informed consent.
- Prevention – It is better to take action before harm occurs
- Proportionality – The least intrusive response appropriate to the risk presented
- Protection – Support and representation for those in greatest need
- Partnership – Local solutions through services working with their communities. Communities have a part in preventing, detecting and reporting neglect and abuse
- Accountability – Accountability and transparency in safeguarding practices.

2.5.1 Empowerment: As with all safeguarding principles, the University recognises it's important to act in the best interest of the vulnerable person. Empowerment ensures their thoughts, feelings and opinions are taken in to account, unless they do not have capacity to make decisions as defined in the Mental Capacity Act 2005.

2.5.2 Prevention: It is important to be able to recognise the signs of abuse, harm and neglect. Advice and information regarding safeguarding will be provided by the University in an accessible format and communicated with others, so that any signs of potential harm or harm can be recognised and acted on as early as possible.

2.5.3 Proportionality: The University will ensure the way safeguarding support is provided and concerns are addressed is proportional to the risk presented.

2.5.4 Protection: University staff understand safeguarding processes, know how to make a referral/raise a concern and how to mitigate against harm.

2.5.5 Partnership: University staff will share concerns about those who are vulnerable with other organisations and the local community as long as it is necessary to keep someone safe.

2.5.6 Accountability: The University through implementation of this policy and procedure has clear roles and responsibilities.

3 Purpose of this Policy

3.1 The purpose of this Policy is to aid the University in fulfilling its statutory duties and minimise the risk of harm to children and adults at risk. This Policy forms part of the University's approach to safeguarding and protecting people and should be read in conjunction with the policy and procedures listed at 22.

3.2 The University will ensure that there are appropriate safeguarding policies, procedures and measures in place that are fit for purpose and reviewed annually.

Furthermore, where the University's staff, students or visitors have concerns about the welfare of children or adults at risk, the University will ensure that they know what to do about those concerns and are quick to respond to such concerns.

- 3.3 This Policy has been approved by the Governing Body and is applicable to all members of staff and students as well as visitors to the University (where appropriate). The policy is available on both the student and staff webpages of the University Website.
- 3.4 All incidents of alleged misconduct concerning safeguarding will be taken seriously by the University and may lead to disciplinary action against those involved.
- 3.5 Whilst the University is primarily a Higher Education Institution and as such staff are not routinely directly involved with children (i.e. those under the age of eighteen), there are a number of situations when University Staff and Students have direct contact with children, these may include:
- Teaching enrolled students who are under 18
 - Acting as a personal tutor to students under 18
 - Providing support services to applicants and students under 18, including counselling, disability and student finance advice
 - Running summer schools at the University or off campus
 - Providing work experience for children under 18
 - Running open days
 - Undertaking outreach work in schools or colleges
 - Guest lecturing on a regular/frequent basis in the University Collegiate School or other schools or colleges
 - Interviewing applicants
 - Undertaking research involving children
 - Observing trainee teachers who are teaching children under 18 or student nurses who are providing care to under 18s
 - Voluntary work with children under 18
 - Placements undertaken with children under 18
 - It should also be noted that some members of the University of Bolton community will be parents and through engagement with these staff or students concerns may arise regarding their children or other family members.

- 3.6 Where, as part of their studies, a student is required to engage in a placement outside of the University, they shall use the safeguarding arrangements applicable at that provider. The University will ensure as part of its assessment of placement providers that such a policy is in place.
- 3.7 Apprenticeships: Employers offering apprenticeships to University students will be made aware of who the relevant Designated Safeguarding Champion is within the Apprenticeship Hub at the University in the event that Employers need to share any concerns about a child or adult at risk, being at risk of harm. The Director of Apprenticeships has responsibility for informing Employers of safeguarding arrangements at the University of Bolton. The University will work with Employers accepting University students as apprentices in relation to training and to ensure appropriate safeguarding measures are in place.
- 3.7.1 Safeguarding, PREVENT and British Values are key themes discussed with apprentices at their quarterly review meetings, apprentices can also discuss such topics with their employers;
- 3.7.2 In addition, apprentices will be provided with information on Safeguarding, PREVENT, Bullying, Harassment, Victimisation and Sexual Misconduct at their induction;
- 3.7.3 The University has developed four online tutorials for all students including apprentices on Safeguarding, PREVENT, British Values and Sexual Consent, it is expected all apprentices will complete these online tutorials during their studies;
- 3.7.4 Apprenticeship students have access to the same support as all other students this includes but is not limited to support from the: Disability Service, Life Lounge (Student Mental Health and Wellbeing Services), Student Funding Advisor, Student Advisors, Student Liaison Officers and Students' Union.

4 Relevant Legislation

- 4.1 The legislation relevant to this Policy includes the Children Acts (1989 and 2004) and related guidance. This includes the DfE statutory guidance 'Keeping Children Safe in Education', September (2023); the DfE revised Statutory Framework for Early Years Foundation Stage (2017) and Working Together to Safeguard Children (2018), The Care Act (2014) and the Safeguarding Vulnerable Groups Act (2006) (SVGA 2006), Prevent Duty under the Counter-Terrorism and Security Act 2015 and the Domestic Abuse Act 2021.

5 Definitions

- 5.1 There are various definitions used in this Policy as follows:
- 5.2 "Abuse" - definitions of the categories of abuse related to both children and adults at risk can be found in Appendix 2.
- 5.3 "Child" or "children" includes all those who are under the age of 18 years.

- 5.4 “Regulated activity relating to adults at risk/vulnerable adults” is defined in the SVGA 2006 and includes (this is not an exhaustive list): the provision of health care treatment in any setting by a health care professional, or by a person acting under the direction or supervision of a health care professional, the provision of certain types of personal care to a person who needs it because of age, illness or disability, the provision of prescribed social work by a social worker to clients or potential clients’ the provision of assistance, in relation to general household matters, to a person who requires it because of age, illness or disability, transportation provided because of a person's age, illness or disability.
- 5.5 “regulated activity relating to children” is defined in the SVGA 2006 and includes (this is not an exhaustive list):
- 5.5.1 specified unsupervised activities relating to children (e.g. teaching, training, instruction, care or supervision) which are carried out on a frequent (as a general rule at least once a week), or intensive (more than three days in any 30 day period) basis, or overnight (between 2am and 6am where the activity gives the person the opportunity to have face-to-face contact with children);or
- 5.5.2 certain work in a specified place which provides the opportunity for frequent contact with children (e.g. a school).
- 5.6 “Adult at risk” (previously “Vulnerable adult”) - means a person aged 18 or over whose ability to protect himself or herself from violence, abuse or neglect is significantly impaired through physical or mental disability or illness, through old age or otherwise and to whom a “regulated activity relating to vulnerable adults” is provided.
- 5.7 The Care Act 2014 informs us that safeguarding duties apply to an adult who is over 18 years of age, who:
- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
 - Is experiencing, or at risk of, abuse or neglect; and
 - As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- 5.8 “University Member” is used to describe anyone at the University who is engaged in working with children or vulnerable adults on the University’s behalf, whether as an employee, volunteer, apprentice or student.

6 Positions of Responsibility

- 6.1 The University has appointed a (Senior) Designated Executive Safeguarding Lead who is the Registrar & Clerk to the Governors and is also the Executive PREVENT Lead and a Designated Executive Safeguarding Lead who is the Assistant Vice Chancellor (Transformation) are responsible for:
- 6.1.1 acting as the main executive lead on all safeguarding matters;

- 6.1.2 appointing a Safeguarding Officer (SO) who will take an operational lead on safeguarding;
 - 6.1.3 ensuring the Safeguarding Officer implements and promotes the policy;
 - 6.1.4 reporting to appropriate committees, Vice Chancellor and Board of Governors on Safeguarding and providing assurances on the effectiveness of safeguarding measures at the university;
 - 6.1.5 chairing the University Safeguarding and Prevent Working Group;
 - 6.1.6 supporting operational safeguarding post holders and the wider staff on complex safeguarding matters including where appropriate seeking legal advice.
- 6.2 All the University's staff, students and visitors should know who to go to report a concern around safeguarding.
- 6.3 The University will therefore appoint two **Safeguarding Officers (SO)** who will lead on safeguarding in the University. The **SOs** will be responsible for:
- 6.3.1 implementing and promoting this Policy ensuring the Policy is available to all staff, students and externals via the University Policy Zone and associated Safeguarding webpages;
 - 6.3.2 regularly reporting to the Registrar and Assistant Vice-Chancellor (Transformation) as applicable;
 - 6.3.3 on a regular basis the Safeguarding Officers will report to the Assistant Vice-Chancellor (Transformation) who is the Designated Executive Safeguarding Lead on all issues that arise in relation to this policy and will confirm to the Assistant Vice-Chancellor (Transformation) on an annual basis that the policy has had necessary revisions in accordance with changes in legislation and guidance on the safeguarding of children and adults at risk;
 - 6.3.4 acting as the main operational lead within the University for the safeguarding of children and adults at risk;
 - 6.3.5 providing University members with information, advice and guidance in relation to safeguarding;
 - 6.3.6 referring concerns that a child might be at risk of significant harm to the local children's social care services and/or the Police;
 - 6.3.7 establishing and maintaining contacts with the local children's social care services departments and Police;
 - 6.3.8 ensuring that concerns are logged and stored securely, training will be provided to any newly appointed SDSC on how to record and report new referrals, this training will be delivered in person by the SOs/DSOs or an experienced SDSC;

6.3.9 maintaining confidential records of reported concerns and action taken; and

6.3.10 supporting colleagues with referrals to the Disclosure and Barring Service (“DBS”) where required under the SVGA 2006.

6.4 It is not the role of the Safeguarding Officers to decide whether a child/ adult at risk has been abused or not - that is the responsibility of investigative statutory agencies such as Children’s Social Work Services or the Police.

The Safeguarding Officers will appoint three **Deputy Safeguarding Officers (DSOs)**, **Senior Designated Safeguarding Champions (SDSCs)** and **Designated Safeguarding Champions (DSCs)** to assist in discharging their responsibilities. The SO in consultation with the Academic Management will also ensure DSCs are appointed for each school and relevant professional support services including the Students’ Union.

The role of the **DSOs** includes:

- deputising in the absence of the SOs;
- supporting the SDSCs and DSCs;
- providing University members with information, advice and guidance in relation to safeguarding;
- referring concerns that a child might be at risk of significant harm to the local children’s social care services and/or the Police;
- establishing and maintaining contacts with the local children’s social care services departments and Police;
- ensuring that concerns are logged and stored securely, training will be provided to any newly appointed SDSC on how to record and report new referrals;
- maintaining confidential records of reported concerns and action taken; and
- supporting colleagues with referrals to the Disclosure and Barring Service (“DBS”) where required under the SVGA 2006.

The role of the **SDSCs** includes:

- acting as the first port of contact for the DSCs who are making a report/referral, which includes checking on safeguarding@bolton.ac.uk on a daily basis;
- provide support to colleagues with safeguarding enquiries/concerns;
- to liaise directly with the SOs and DSOs in relation to incidents which may require referring externally;

- referring concerns that a child might be at risk of significant harm to the local children's social care services and/or the Police;
- liaise with external bodies under the direction of the SOs and DSOs.

The role of the **Designated Safeguarding Champions (DSCs)** includes:

- acting as the first port of call for all safeguarding concerns within their department;
- ensuring that University staff and students, and visitors to the University (where appropriate), are aware of the policies and procedures in place for safeguarding children and adults at risk and that these policies and procedures are followed;
- signposting and/or providing support services for individuals who are named on a Safeguarding Report;
- With prior approval of the SOs or DSOs the DSCs can seek to verify information with external organisations and liaise with external organisations with regards safeguarding concerns and the provision of any support for any student for whom a safeguarding referral to the SDSCs, DSOs or SOs has been made,
- signposting support for staff who have reported a concern.

6.5 The **Executive Director of HR** shall be the institutional point of contact for managing any safeguarding concerns relating to staff and with the assistance of the HR DSC will be responsible for the co-ordination of all safeguarding training (see training) and ensuring appropriate procedure is adhered to in accordance with this Policy for recruitment of University staff.

6.6 A list of key contacts, including details of the SO, the DSO, SDSCs and the DSCs, can be found at Appendix 3. The relevant contact details for each of the key contacts can be found at Appendix 8. Alternatively, a list of SDSCs and DSCs is available from the Student Centre; Life Lounge, Security or Main Reception.

7 Training

7.1 HR has formal responsibility for sourcing, coordinating, monitoring engagement with Safeguarding and PREVENT Training, ensuring staff undertake the required training. This is applicable for all staff including those with a named position within this policy. HR are also responsible for retaining records and evidence of completion of all Safeguarding and PREVENT Training and providing data as required for instance, to support audits, inspections and reporting purposes.

7.2 Training will be arranged by HR for the SO, DSO, SDSCs and DSCs to ensure that they are aware of issues, policies and procedures. The Designated Executive Safeguarding Leads, SO and DSO will undertake formal training every two years. Staff who hold a position of SDSC or DSC will be required to undertake training as a minimum every three years. This training will be CPD accredited training and will be delivered online.

- 7.2.1 The Designated Executive Safeguarding Leads, SOs and DSOs will as a minimum have completed PREVENT Training and Level 3 Child and Adult Safeguarding Training.
- 7.2.2 The SDSCs will as a minimum have completed PREVENT Training and Level 2 Child and Adult Safeguarding Training.
- 7.2.3 The DSCs will as a minimum have completed PREVENT Training and Level 1 Child and Adult Safeguarding Training.
- 7.3 The SO, DSO, SDSCs, DSCs and all members of the University's staff shall undertake training provided by HR, to ensure that:
 - 7.3.1 they are made aware of this Policy and the procedures and protocols for promoting and safeguarding the welfare of children and adults at risk;
 - 7.3.2 they learn how to recognise their responsibilities with regard to their own good practice and the reporting of suspected poor practice/ concerns of possible abuse.
 - 7.3.3 they are familiar with, and should know whom to contact, to express concerns about a child's welfare or adult at risk, health and/or development; and
 - 7.3.4 safeguarding awareness training is mandatory for all staff, all new staff will undertake safeguarding awareness training as part of their induction process. Existing staff be asked to complete safeguarding awareness training every three years.
 - 7.3.5 safeguarding training will be provided to any volunteer i.e. Peer Mentor/PASS Leader or student employed by the University i.e. Student Ambassador who works directly with children and/adults at risk in their capacity as a volunteer or employee of the University of Bolton by HR.
 - 7.3.6 PREVENT training is mandatory for all staff, all new staff will undertake PREVENT training as part of their induction process. Existing staff will be asked to complete PREVENT training every three years or more frequently if required.
- 7.4 All staff will be informed annually of any updates in relation to safeguarding including changes to this policy and procedure.
- 7.5 Newly appointed SDSCs, DSOs and SOs in addition to CPD accredited training provided by HR will receive training from an existing/experienced SO/DSO/SDSC on managing safeguarding referrals in accordance with this policy and university practices. This training will be delivered in person and will focus on responding to a safeguarding referral and maintaining safeguarding records.
- 7.6 Networking events with the DSCs will take place bi-annually and these will be used to disseminate best practice, inform of changes to legislation, inform of changes to policy and procedure, provide additional training and afford DSCs with an opportunity to reflect on any concerns, allegations or referrals they have made noting any case studies or reflective work will be anonymised. HR have

responsibility for organising and recording attendance at these events. The agenda and event delivery will be coordinated by the SO, DSO and colleagues in HR working collaboratively.

8 Code of Behaviour and Good Practice in Relation to Safeguarding Children and Adults at Risk

- 8.1 All members of the University's staff, students and visitors (where appropriate) should treat each other in accordance with Equal Opportunities Policy and the Code of Behaviour and Good Practice at Appendix 4.

9 Reporting a concern

- 9.1 Any incidents which cause concern in respect of a child or adult at risk are required to be reported immediately. University staff and students should in the first instance report any safeguarding concern to their relevant Designated Safeguarding Champion (DSC). University of Bolton students should in the first instance report any safeguarding concern to their relevant DSC or alternatively to safeguarding@bolton.ac.uk. Externals i.e. non staff or students can report any safeguarding concern to safeguarding@bolton.ac.uk.
- 9.2 Appendix 10 provides guidance on raising and reporting Low-Level Safeguarding Concerns and Supporting Students and Staff with Pastoral and Welfare Related Issues. Low-Level Safeguarding Concerns is defined in Keeping Children Safe in Education 2023 as any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working on or on behalf of the University including a student on a placement or an apprentice in employment may have acted in a way that is inconsistent with our policies and procedures and relevant codes of conduct.
- 9.3 DSCs can make a safeguarding referral to the SDSCs, DSOs and SOs using the Reporting a Concern Form as in Appendix 5 or via the online DSC Reporting a Concern Form. Examples of incidents that you may want to include are at Appendix 6. The Senior Designated Safeguarding Champions will share any concern directly with the SO or DSO as required.
- 9.4 If a concern is reported to you, there is guidance about handling allegations at Appendix 7. You should then complete the form at Appendix 5
- 9.5 The process of raising and reporting a safeguarding concern is diagrammatically represented in Appendix 1.
- 9.6 The reporting of a safeguarding concern may require the implementation of other procedures and or policies including but not limited to the Staff and or Student Non Academic Conduct and Disciplinary Policy and Procedure or Fitness to Practice Policy and Procedure.

We will aim to take action on any concern reported/incident of abuse on the same day were possible or within two working days if this is not possible. Actions taken may include any combination of the following (non-exhaustive list):

- a. Sharing of information with statutory agencies/external safeguarding partners;
- b. responding to the person making the referral with an offer of support, additional

information to be shared with the person whom is of concern including signposting information to sources of support both within the University and external to the University;

- c. establishing contact with the person who is of concern to establish further information, provide support, discuss next steps;
- d. make further enquiries as required to ascertain necessary information to support decision making.

These actions or any required on receipt of a concern will be undertaken by the Safeguarding Officers, Deputy Safeguarding Officers, Senior Designated Safeguarding Champions, Assistant Vice-Chancellor (Transformation) or in their absence the Executive Director of HR. It is these staff who will report concerns raised/share data with any relevant external organisation.

- 9.7 To support the Safeguarding of students at Petroc College and Bradford College (Satellite Centres) the University has University employed staff at these centres who fulfil the role of Designated Safeguarding Champions. Reporting of a safeguarding concern for a student at a satellite centre is undertaken in the same way as reporting a concern of a student for a student at the Bolton campus as documented in Appendix 1.

9.8 Additional reporting

- 9.8.1 In addition to the reporting requirements explained above, the University will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to the following:

Health and Safety Executive

- (i) The University is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the University's Health and Safety Policy for further details about this.

9.8.2 Disclosure and Barring Service (DBS)

- (i) A referral to the DBS will be made promptly if the relevant criteria are met.

9.8.3 Insurers

- (i) The University will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (ii) Care should be taken to ensure this is done before renewal to ensure that the University complies with its duties under the Insurance Act 2015. If the University is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to

locate the relevant insurer, professional advice should be sought.

9.8.4 Office for Students (OfS)

- (i) A referral to the OfS will be made if the relevant criteria are met in accordance with the Reportable Events guidance.

10 Record Keeping

- 10.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The records created in accordance with this Policy may contain personal data.
- 10.2 All personal data will be processed by the University in accordance with the requirements of data protection legislation, including the Data Protection Act 2018 and UK General Data Protection Regulation. The University has a number of privacy notices which explain how the University will use personal data for the benefit of students and staff. The privacy notices are published on the University's website and can be found here:

<https://www.bolton.ac.uk/about/governance/documents/#dataprotection>.

In addition, staff must ensure that they follow the University's Data Protection Policy when handling personal data created in connection with this policy.

- 10.3 All records created in accordance with this Policy are managed in accordance with the University's policies that apply to the retention and destruction of records.

11 Information sharing and multi-agency working

- 11.1 The University will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The University will always act in order to safeguard and promote the welfare of others.
- 11.2 The University understands that information sharing is essential for effective safeguarding and promoting the welfare of children, young people and adults at risk. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of the University's students, which is always the University's paramount concern. The University understands that the Data Protection Act 2018 and the UK General Data Protection Regulation provide a framework to ensure that personal information is shared appropriately.
- 11.3 Where allegations have been made against staff, the University will consult with the Designated Offices(s) of the Local Authority and, where appropriate, the police to agree the information that should be disclosed and to whom.
- 11.4 While the University will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

12 Recruitment

- 12.1 The University will undertake appropriate checks on all staff (including people from or working overseas) to ensure an individual's suitability for their role. In particular, consideration will be given to eligibility for the following checks and if so at what level and frequency checks should be undertaken for the role:
- 12.1.1 CVs;
 - 12.1.2 References;
 - 12.1.3 Employment history (and exploring any gaps in their employment history);
 - 12.1.4 Whether it is appropriate to ask a potential member of staff whether they have any unspent criminal convictions or to themselves obtain a basic DBS check;
 - 12.1.5 Where a role includes carrying work which would be deemed "regulated activity" if done more regularly, the University will consider whether or not it is appropriate to require a standard or enhanced disclosure from the DBS or an International Child Protection certificate before they are permitted to work on an unsupervised basis.
 - 12.1.6 Confirmation that the person can work in the UK; and
 - 12.1.7 Health checks where appropriate.
- 12.2 For positions that involve "regulated activity relating to children" or "regulated activity relating to vulnerable adults (adults at risk)", the following procedures will be completed:
- 12.2.1 All applicants will be required to complete an application and as part of this application in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and/or the Police Act 1997 (Criminal Records) Regulations 2002 will be required to disclose any convictions, cautions, reprimands or final warnings which would not be filtered. Therefore, applicants are required to disclose information in relation to any past criminal behaviour that is relevant to the position.
 - 12.2.2 References will be sought from all staff applicants and from prospective students to specific programmes of study.
 - 12.2.3 If the applicant or an existing University Member who has not previously been required to work with children or adults at risk in their position has no experience of working with children or adults at risk the University will agree specific training requirements with them before appointment.
 - 12.2.4 The University is registered with the DBS and will ensure that any University Members who will engage in "regulated activity relating to children" or "regulated activity relating to vulnerable adults (adults at risk)" are checked for relevant criminal convictions. The University will request an Enhanced Disclosure from the DBS and, if applicable to any

particular role, seek confirmation that the applicant is not named on the Children's and/or Adults' Barred List in respect of all applicants who will engage in such activity. Any such disclosures will be stored securely and confidentially and only used for the purposes of the applicant's application and otherwise in accordance with the Policy and Guidance Notes on the use of the Disclosure and Barring Service (DBS) and Employment Contract, the University's Data Protection Policy and data protection legislation, including the Data Protection Act 2018 and General Data Protection Regulation.

13 Activities or events run by the University where children or adults at risk are to be present (to be read in conjunction with Outreach Events – Safeguarding Guidelines)

13.1 University staff or students organising activities at the University involving children and/or adults at risk must ensure that:

13.1.1 the DSC (Events and Division of Marketing and UG Recruitment and Admissions) is informed of the activity taking place well in advance and provided with details of the activity as well as details of those individuals involved in the activity;

13.1.2 the individuals involved in the activity are aware of and understand the Policy and these procedures;

13.1.3 private or unobserved contact with children is avoided wherever possible;

13.1.4 if first aid is required, where possible, it is administered in the presence of another adult and the DSC is informed; and

13.1.5 parental consent is obtained for the use of any photographs, film or videos.

13.2 The DSC (Events and Division of Marketing and UG Recruitment and Admissions) is then responsible for ensuring that those individuals assisting in the activity, be they University staff, students or volunteers are suitable to work with children or adults at risk and that they have had the necessary checks.

14 External organisations visiting the University

14.1 External organisations working with children or adults at risk and using University facilities will be required to provide a written statement stating that their staff, and/or volunteers, where appropriate have had the necessary checks and that the organisation has its own policy and procedure and nominated safeguarding officer. The written statement must identify who the organisation has nominated as a safeguarding officer.

15 Research

15.1 Where any research involves contact with children or adults at risk, the University Research Ethics Committee will, with guidance from the Research and Graduate

School DSC, identify any specific practices to be followed in the research in the interests of safeguarding the welfare of children and/or adults at risk.

16 Prevent Duty

- 16.1 Under the Prevent duty introduced by the Counter-Terrorism and Security Act 2015, the University, as a higher education body will need to assess the risks of people being drawn into terrorism and ensure that it has plans in place for mitigating these risks.
- 16.2 The University will have due regard to the need to prevent people from being drawn into terrorism and will have regard to the Government's Prevent Duty Guidance: for England and Wales.
- 16.3 Staff who have concerns relating to students or colleagues being drawn in to terrorism should contact the relevant DSC.
- 16.4 The University Safeguarding Officer and one of the Senior Designated Safeguarding Champions are members of the Bolton Prevent Steering Group.
- 16.5 The University Safeguarding Officer and one of the Senior Designated Safeguarding Champions are members of the Greater Manchester Prevent University Group.

17 Channel

- 17.1 Channel forms a key part of the Prevent strategy. It is a local way of various agencies acting to identify and support individuals and support individuals to prevent them from moving into terrorism.
- 17.2 Manchester Local Authority is required by law to establish a "Channel Panel" to assess whether a particular person is at risk of being drawn into terrorism and if he/she is then supported in reducing that risk.
- 17.3 The law states that the University is a partner of the Channel Panel and that the University must, so far as is lawful and reasonably practicable, co-operate with:
 - 17.3.1 The Channel Panel in the carrying out of the Panel's functions; and
 - 17.3.2 The Police who work with the Channel Panel
- 17.4 In co-operating with the Channel Panel and the Police, the University will act in accordance with its statutory and legal obligations and will not act outside of its powers.
- 17.5 In accordance with the University's obligations under data protection legislation, including the Data Protection Act 2018 and UK General Data Protection Regulation, the University will share information with the Channel Panel.

18 Students' Union

- 18.1 The University will work with its Students' Union to manage the risks relating to activity which involves Children or Adults at Risk and originates with the Students'

Union. To this extent the Students' Union has a Designated Safeguarding Champion who is also a member of the University Safeguarding and PREVENT Working Group.

19 Welfare and pastoral care/chaplaincy support

- 19.1 The welfare of the University's staff and students is paramount. The University therefore has support services including chaplaincy and pastoral support including but not limited to Mental Health Advisors, Counsellors, CBT Therapists, Wellbeing Staff and Dignity at Study Champions (Bullying and Harassment) available for all students. Staff have access to VIVUP and the chaplaincy.

20 Working in Partnership

- 20.1 The University recognises the importance of safeguarding children and adults at risk and the need to work in partnership with external organisations in order to fulfil its responsibilities.

21 Promotion of Safeguarding

- 21.1 This policy and procedure is available via the University of Bolton webpages/ Policy Zone and Safeguarding webpage <https://www.bolton.ac.uk/student-policy-zone/> and <https://www.bolton.ac.uk/student-area/safeguarding>.

22 Policies and Further Information

- 22.1 This policy and procedure should be read in conjunction with:
- Disclosure and Barring Service (DBS) Policy and Procedure
 - Student Non Academic Conduct and Disciplinary Policy and Procedure
 - Staff Disciplinary Policy
 - Prevent Policy
 - Dignity at Study (Harassment, Bullying, Discrimination and Victimisation) Policy
 - Freedom of Speech and Meetings on University Premises
 - Freedom of Speech and Planned, Affiliated, Funded or Branded Events taking place Off Campus
 - Data Protection Policy
 - University Health and Safety Manual inc. Death of a Student Procedure and Support of Students under 18 years of age
 - Children in the Library Procedure
 - Student Mental Health Policy
 - Student Mental Health and Wellbeing Strategy 2021-2026
 - Suicide Prevention and Response Strategy 2021-2026

The above list of policies and procedures are available from:
<https://www.bolton.ac.uk/student-policy-zone>

- 22.2 Bolton's Safeguarding Adult Board has a vision that all agencies will work together so that adults experiencing, or at risk of abuse or neglect should be able to live a life free from harm, abuse and exploitation. An online manual is available at the link below to provide all the guidance needed for staff working

to safeguard adults experiencing, or at risk of abuse or neglect including those working in social care services, health, police and other services, and the voluntary sector:

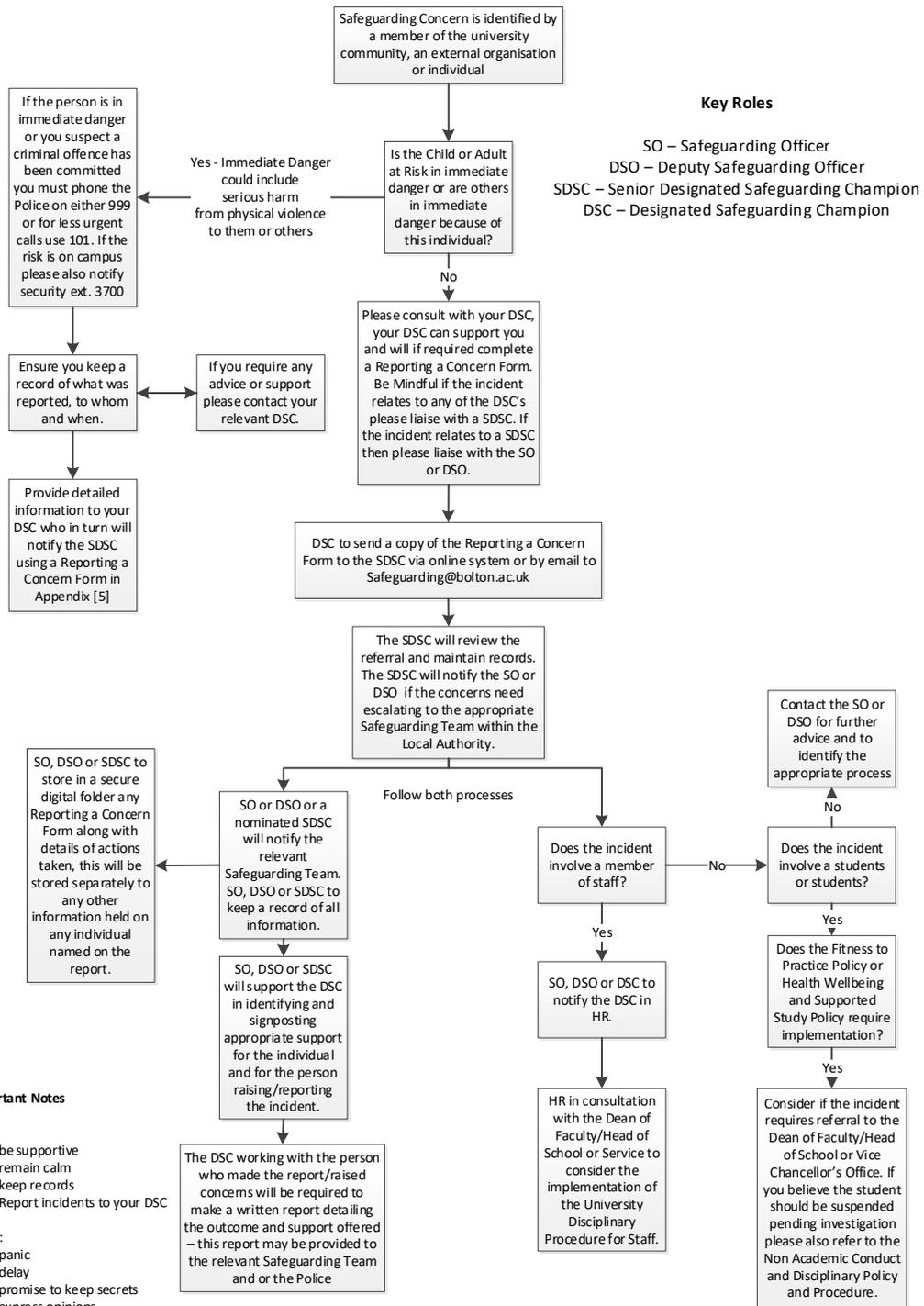
<https://www.bolton.gov.uk/adult-safeguarding-board/professionals>

- 22.3 Online tutorials for students on Safeguarding, PREVENT and British Values are accessible here: <https://leaponline.bolton.ac.uk/Home.aspx>

23 Equality Check

The University is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to the protected characteristics of race, sex, disability, age, sexual orientation, religion or belief, gender reassignment, marriage and civil partnership, pregnancy and maternity.

Appendix 1



Important Notes

- Do:**
- be supportive
 - remain calm
 - keep records
 - Report incidents to your DSC
- Don't:**
- panic
 - delay
 - promise to keep secrets
 - express opinions
 - Disclose information with anyone other than designated staff
 - Investigate
 - ask leading questions

Appendix 2

Definition of Abuse (Guidance non-exhaustive lists)

Children

Abuse

1 Abuse is a form of maltreatment and can take a number of forms. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. There are four categories of abuse which are relevant for the purposes of registration on the child protection register and these are:

1.1 **Physical abuse** is a form of abuse which may involve:

- (i) beating;
- (ii) hitting;
- (iii) pushing;
- (iv) shaking;
- (v) kicking;
- (vi) throwing;
- (vii) pinching;
- (viii) biting;
- (ix) choking;
- (x) hair-pulling;
- (xi) burning with cigarettes, scalding water or other hot objects; or
- (xii) severe physical punishment.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

1.2 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening and which may involve:

- (i) Fondling, touching or kissing a child's genitals or making a child fondle an adult's genitals;
- (ii) violations of bodily privacy, such as forcing the child to undress or spying on a child in the bathroom or bedroom;
- (iii) using a child in the production of pornography, such as a film or magazine or exposing children to pornography;
- (iv) luring a child for sexual liaisons, through the internet or by any other means; or
- (v) sexual exploitation such as using a child to perform sex with others or sexual acts with a child, penetration, intercourse, incest, rape, oral sex.

1.3 **Neglect** is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse or, once a child is born, it may involve:

- (i) failing to provide adequate food or clothing;
- (ii) failing to protect a child from physical and emotional harm or danger;

- (iii) failing to ensure adequate supervision, including using inadequate people to provide care;
- (iv) failing to ensure access to appropriate medical care or treatment; or
- (v) being unresponsive to a child's emotional needs.

1.4 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development and which may involve:

- (i) ignoring;
- (ii) withdrawal of attention;
- (iii) rejection;
- (iv) threatening or frightening;
- (v) serious bullying (including cyberbullying);
- (vi) belittling such as telling the child he or she is "no good", "worthless", "bad", or "a mistake";
- (vii) using extreme forms of punishment, such as confinement to a closet or dark room; or
- (viii) witnessing the physical abuse of others.

2 The above definitions, provided for guidance purposes only, indicate acts (or omissions) which may constitute abuse. They are as relevant in the context of vulnerable adults as they are with children. They should not be considered exhaustive and if any member of University staff, student or visitor to the University (where appropriate) has any concerns about a child or vulnerable adult they should raise these concerns with the appropriate individual in accordance with these procedures.

Adults

Abuse

3 Abuse can take a number of forms. There are ten categories of abuse which are relevant for the purposes of adults at risk.

3.1 **Physical abuse** which may involve:

- (i) assault;
- (ii) hitting;
- (iii) punching;
- (iv) slapping;
- (v) kicking;
- (vi) throwing;
- (vii) pinching;
- (viii) biting;
- (ix) choking;
- (x) hair-pulling;
- (xi) burning with cigarettes, scalding water or other hot objects; or

- (xii) severe physical punishment
- (xiii) making someone purposefully uncomfortable
- (xiv) involuntary isolation or confinement
- (xv) misuse of medication
- (xvi) forcible feeding or withholding food
- (xvii) unauthorised restraint

3.2 **Domestic abuse** or violence

- (i) psychological;
- (ii) physical;
- (iii) sexual;
- (iv) financial;
- (v) emotional.

The Domestic Abuse Act 2021 sets out two criteria governing the relationship between the abuser and the abused. The first criteria states that both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over. The second criteria states that both persons must be “personally connected”. The definition ensures that different types of relationships are captured, including ex-partners and family members. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic abuse. Coercive behaviour can include:

- (i) acts of assault, threats, humiliation and intimidation;
- (ii) harming, punishing, or frightening the person;
- (iii) isolating the person from sources of support;
- (iv) exploitation of resources or money;
- (v) preventing the person from escaping abuse;
- (vi) regulating everyday behaviour.

3.3 **Sexual abuse** can include:

- (i) rape, attempted rape or sexual assault;
- (ii) inappropriate touch anywhere;
- (iii) non- consensual masturbation of either or both persons;
- (iv) non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth;

- (v) any sexual activity that the person lacks the capacity to consent to
- (vi) inappropriate looking, sexual teasing or innuendo or sexual harassment;
- (vii) sexual photography or forced use of pornography or witnessing of sexual acts;
- (viii) indecent exposure.

3.4 Psychological or emotional abuse can include:

- (i) enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- (ii) removing mobility or communication aids or intentionally leaving someone unattended when they need assistance;
- (iii) preventing someone from meeting their religious and cultural needs;
- (iv) preventing the expression of choice and opinion;
- (v) failure to respect privacy;
- (vi) preventing stimulation, meaningful occupation or activities
- (vii) intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse;
- (viii) addressing a person in a patronising or infantilising way
- (ix) threats of harm or abandonment
- (x) cyber bullying.

3.5 Financial or material abuse can include:

- (i) theft of money or possessions;
- (ii) fraud, scamming;
- (iii) preventing a person from accessing their own money, benefits or assets;
- (iv) employees taking a loan from a person using the service;
- (v) undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- (vi) arranging less care than is needed to save money to maximise inheritance;
- (vii) denying assistance to manage/monitor financial affairs;
- (viii) denying assistance to access benefits;
- (ix) misuse of personal allowance in a care home;

- (x) misuse of benefits or direct payments in a family home;
- (xi) someone moving into a person's home and living rent free without agreement or under duress;
- (xii) false representation, using another person's bank account, cards or documents;
- (xiii) exploitation of a person's money or assets, e.g. unauthorised use of a car;
- (xiv) misuse of a power of attorney, deputy, appointeeship or other legal authority;
- (xv) rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

3.6 **Modern Slavery** can include:

- (i) human trafficking;
- (ii) forced labour;
- (iii) domestic servitude;
- (iv) sexual exploitation, such as escort work, prostitution and pornography;
- (v) debt bondage – being forced to work to pay off debts that realistically they never will be able to.

3.7 **Discriminatory abuse** can include:

- (i) unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation;
- (ii) verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic;
- (iii) denying access to communication aids, not allowing access to an interpreter, signer or lip-reader;
- (iv) harassment or deliberate exclusion on the grounds of a protected characteristic;
- (v) denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic;
- (vi) substandard service provision relating to a protected characteristic.

3.8 **Organisational or institutional abuse** can include:

- (i) discouraging visits or the involvement of relatives or friends;

- (ii) run-down or overcrowded establishment;
- (iii) authoritarian management or rigid regimes;
- (iv) lack of leadership and supervision;
- (v) insufficient staff or high turnover resulting in poor quality care;
- (vi) abusive and disrespectful attitudes towards people using the service;
- (vii) inappropriate use of restraints;
- (viii) lack of respect for dignity and privacy;
- (ix) failure to manage residents with abusive behaviour;
- (x) not providing adequate food and drink, or assistance with eating;
- (xi) not offering choice or promoting independence;
- (xii) misuse of medication;
- (xiii) failure to provide care with dentures, spectacles or hearing aids;
- (xiv) not taking account of individuals' cultural, religious or ethnic needs;
- (xv) failure to respond to abuse appropriately;
- (xvi) interference with personal correspondence or communication;
- (xvii) failure to respond to complaints.

3.9 Neglects and acts of omission can include:

- (i) failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care;
- (ii) providing care in a way that the person dislikes;
- (iii) failure to administer medication as prescribed;
- (iv) refusal of access to visitors;
- (v) not taking account of individuals' cultural, religious or ethnic needs;
- (vi) not taking account of educational, social and recreational needs;
- (vii) ignoring or isolating the person;
- (viii) preventing the person from making their own decisions;
- (ix) preventing access to glasses, hearing aids, dentures, etc.
- (x) failure to ensure privacy and dignity.

3.10 Self Neglect can include:

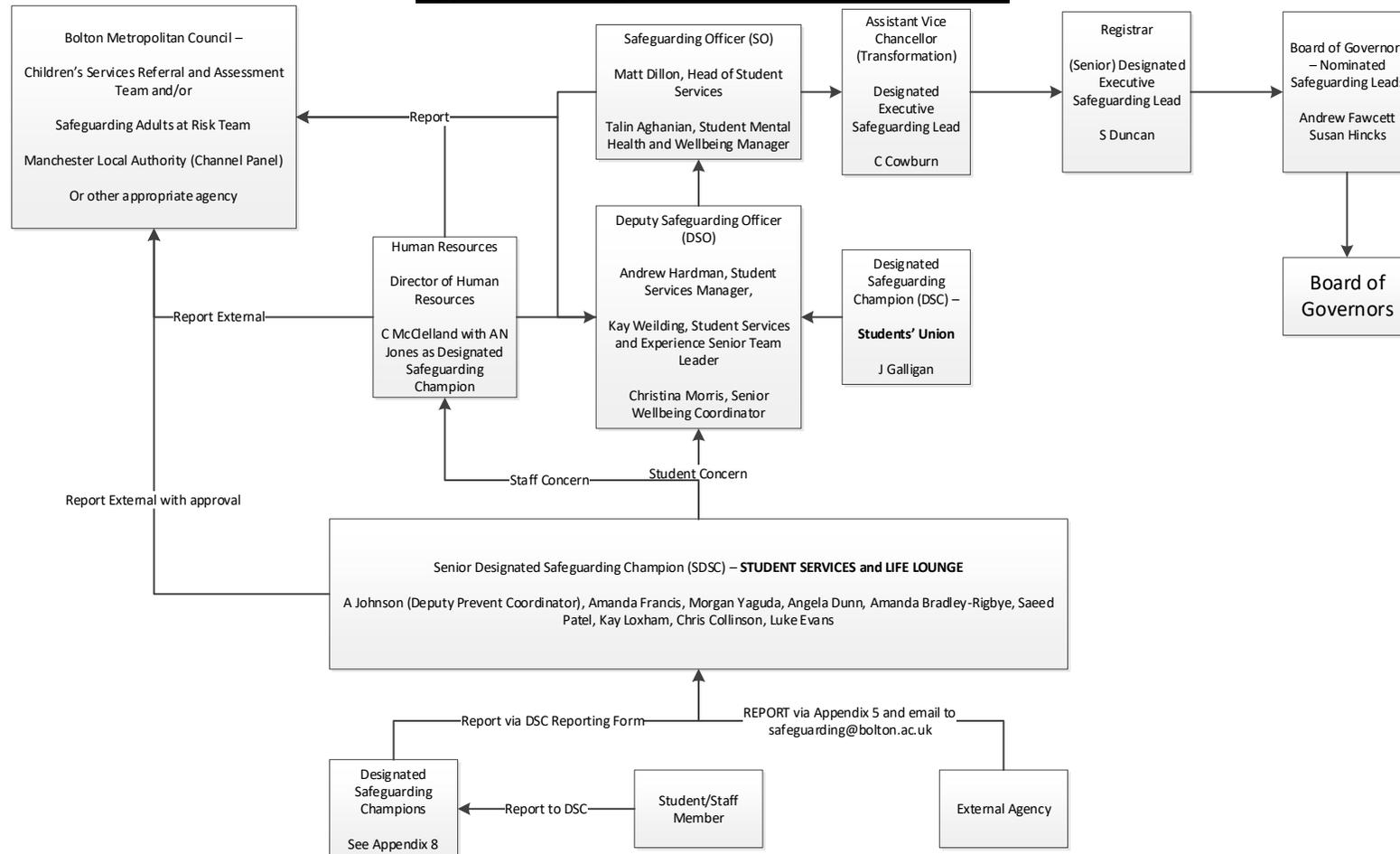
- (i) lack of self-care to an extent that it threatens personal health and safety;
- (ii) neglecting to care for one's personal hygiene, health or surroundings;
- (iii) inability to avoid self-harm

- (iv) failure to seek help or access services to meet health and social care needs;
- (v) inability or unwillingness to manage one's personal affairs.

3.11 **Exploitation** can include:

either opportunistically or premediated, unfairly manipulating someone for profit or personal gain (also see modern slavery)

Appendix 3 - Key Contact Details and Structure



Appendix 4

Code of Behaviour and Good Practice in relation to Safeguarding Children or Adults at Risk

- 1 The University believes that:
 - 1.1 all children, adults at risk, University staff, students and visitors should be treated with respect;
 - 1.2 all activities involving children and adults at risk should have more than one adult present or at least that one is within sight or hearing of others;
 - 1.3 respect should be given to a child's or adults at risk rights to personal privacy;
 - 1.4 in all activities, University staff and students, and visitors to the University where appropriate, should be aware that physical contact with a child or young person may be misinterpreted;
 - 1.5 in all activities, University staff and students, and visitors to the University where appropriate, should recognise that special caution is required when discussing sensitive issues with children or adults at risk;
 - 1.6 where any physical touching is required, it should be provided openly and if this is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body;
 - 1.7 in activities, feedback should be constructive rather than negative;
 - 1.8 in all activities, University staff and students, and visitors to the University where appropriate, are required to challenge unacceptable behaviour in accordance with the provisions of these procedures; and
 - 1.9 any allegations or suspicions of abuse should be reported immediately to a DSC.
- 2 In all dealings with children and adults at risk, University staff and students, and visitors to the University where appropriate, should never:
 - 2.1 play rough physical games or sexually provocative games;
 - 2.2 share a room overnight with a child or vulnerable adult;
 - 2.3 enter the private room of a child or adult at risk unless it is absolutely necessary and if entering such a room must do so accompanied;
 - 2.4 allow or engage in any form of inappropriate touching;
 - 2.5 form or seek to form relationships of a sexual nature or which may lead to sexual activity (i.e. "grooming");

- 2.6 allow children or adults at risk to use inappropriate language without challenging it;
- 2.7 make sexually suggestive comments even in jest;
- 2.8 reduce a child or adult at risk to tears as a form of control;
- 2.9 allow allegations made by a child or adult at risk to go unrecorded or not acted upon in accordance with these procedures; and/or
- 2.10 do personal activities (such as washing or dressing) for a child or adult at risk which they can do for themselves. If a child has a disability, such tasks should only be performed with the full understanding and consent of the parents/carers. An adult at risk may be able to consent for him/her self.

Appendix 5

University of Bolton

Safeguarding Incident Form

You can complete the form below and return this to safeguarding@bolton.ac.uk or alternatively the form is available online here: <https://www.bolton.ac.uk/student-area/safeguarding>.

Your Details (1)	
Name:	
Current job role/ relationship to individual:	
Phone Number:	
Email:	
Address (if external to the University of Bolton):	
Date of completion:	
Referral Details (2)	
(Student or Staff members details for whom a Safeguarding Concern is being raised)	
First Name:	
Surname:	
Student Number (if applicable):	
Staff Number (if applicable):	
Current telephone number (sometimes SITs is not up to date)	
Incident Details (3a)	

Are you reporting a concern raised by?	Yourself <input type="checkbox"/>
	Or Someone Else <input type="checkbox"/>
If reporting concerns raised by someone else, please provide additional information:	
Name:	
Phone Number:	
Email:	
Address (if external to the University of Bolton):	
Does the concern relate to?	Adult at Risk <input type="checkbox"/> (person named above – section 2) Child/Children <input type="checkbox"/> (additional details required – complete section 3a below) Both an Adult at Risk and or a Child/Children <input type="checkbox"/> (additional details required – complete section 3a below)
Additional Personal Details (3b):	
<u>Child 1</u>	
Name:	
Date of Birth:	
Gender:	

Address:	
School or College where child 1 attends: (if applicable)	
<u>Child 2</u>	
Name:	
Date of Birth:	
Gender:	
Address:	
School or College where child 1 attends: (if applicable)	
<u>Child 3</u>	
Name:	
Date of Birth:	
Gender:	
Address:	
School or College where child 1 attends: (if applicable)	

Use the box below to add any additional children or personal details:

--

Details of the Concern (3c): (be clear and factual)

Details of the concern/incident:	
Date of Incident:	
Time of Incident:	
Witnesses to the incident: (include full names, contact details and any other relevant information)	
Description of any visible bruising or other injuries (if applicable):	
Actions Taken: (include any support that you have offered, details of who	

<p>you have discussed your concerns with and when, any external organisations you have signposted the person named in section 2 to etc)</p>	
Sharing Information (3d)	
<p>Does the person named in section 2 know you are making this referral?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>Does the person named in section 3a (if applicable) know you are making this referral?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
Additional Information (4)	
<p>Use the box below to include any additional information you feel may help, i.e. are there any other agencies involved?</p> <p>contact details for any other professionals/agency involved?</p>	

Please return completed forms to the Senior Designated Safeguarding Champions (SDSC) by means of email – safeguarding@bolton.ac.uk

Appendix 6

Examples of incidents which should be reported

- 1 Below are examples of incidents which are to be reported. When:
 - 1.1 a child or adult at risk is accidentally hurt;
 - 1.2 there is a concern that a relationship is developing which may be an abuse of trust;
 - 1.3 you are worried that a child or adult at risk is becoming attracted to you;
 - 1.4 you are worried that a child or adult at risk is becoming attracted to a colleague who cares for them;
 - 1.5 you think a child or adult at risk has misunderstood or misinterpreted something you have done;
 - 1.6 you have been required to physically restrain a child or adult at risk to prevent them from harming themselves or another or from causing significant damage to property;
 - 1.7 you receive a report from a child or adult at risk alleging abuse regarding a member of an external organisation using University facilities;
 - 1.8 you see any suspicious marks on a child or adult at risk;
 - 1.9 you hear of any allegations made by a child or adult at risk of events outside the University;
 - 1.10 you have been provided with information that suggests a student or staff member is putting a child or adult at risk outside of the University i.e. a student through their actions or lack of putting their child at risk;
 - 1.11 you are concerned that the behaviours of a student are putting their children at risk;
 - 1.12 you are concerned that a member of the university community is being drawn into terrorist or extremist groups/activities.

The above examples are provided for guidance purposes only. They are as relevant in the context of adults at risk as they are with children. They should not be considered exhaustive and if any member of University staff, student or visitor to the University (where appropriate) has any concerns about a child or adult at risk they should raise these concerns with the appropriate individual in accordance with these procedures.

Appendix 7

Responding to Allegations

The following table provides some useful dos and don'ts about handling allegations (which has been taken from Safeguarding Children: Guidance for English Higher Education Institutions (HEIs) prepared by the (then) Department for Innovation, Universities & Skills)

DO	DON'T
<ul style="list-style-type: none"> • be supportive 	<ul style="list-style-type: none"> • panic
<ul style="list-style-type: none"> • take what the young person says seriously 	<ul style="list-style-type: none"> • delay
<ul style="list-style-type: none"> • remain calm 	<ul style="list-style-type: none"> • promise to keep secrets
<ul style="list-style-type: none"> • reassure the child/young person that it was right to tell someone 	<ul style="list-style-type: none"> • ask leading questions
<ul style="list-style-type: none"> • use language the child/young person understands 	<ul style="list-style-type: none"> • ask the child/young person to repeat the story unnecessarily
<ul style="list-style-type: none"> • explain what will happen next 	<ul style="list-style-type: none"> • express any opinions about what you are told
<ul style="list-style-type: none"> • write down immediately afterwards what was said, including the time, place and any other observations: sign and date the record. 	<ul style="list-style-type: none"> • discuss the disclosure with anyone other than the DSO and other relevant personnel
<ul style="list-style-type: none"> • pass the report to the DSO and, if you are in a school/college or other HEI, pass a copy to the DSO of that organisation 	<ul style="list-style-type: none"> • start to investigate
<ul style="list-style-type: none"> • remember that you need support. Seek advice and support for yourself. 	

Appendix 8

Key University Contacts

<u>Safeguarding Officers (SOs)</u>	<p>Matthew Dillon (Head of Student Services - Safeguarding Officer and PREVENT Coordinator) Email: mdd1@bolton.ac.uk Telephone: 01204 903498</p> <p>&</p> <p>Talin Aghanian (Student Mental Health and Wellbeing Manager - Safeguarding Officer and Deputy PREVENT Coordinator) Email: T.Aghanian@bolton.ac.uk Telephone: 01204 903069</p>
<u>Deputy Safeguarding Officers (DSOs)</u>	<p>Christina Morris (Senior Wellbeing Coordinator) Email: C.Morris3@bolton.ac.uk Telephone number: 01204 903829</p> <p>&</p> <p>Andrew Hardman (Student Services Manager) Email: A.Hardman@bolton.ac.uk Telephone: 01204 903453</p>
<u>Senior Designated Safeguarding Champions (SDSCs)</u>	
Heather Mackay – Mental Health Advisor	Email: H.Mackay@bolton.ac.uk Telephone: 01204 903566
Vacant – Mental Health Advisor	Email: TBC Telephone: TBC
Leah Lawrenson – Wellbeing Coordinator	Email: L.Lawrenson@bolton.ac.uk Telephone: 01204 903566
Angela Dunn – Counsellor	Email: A.Dunn@bolton.ac.uk Telephone: 01204 903212
Amanda Bradley-Rigbye – Counsellor	Email: A.Bradley-Rigbye@bolton.ac.uk Telephone: 01204 903240
José Carlos Moriano De La Fuente – Disability Service Team Leader	Email: J.MorianoDeLaFuente@bolton.ac.uk Telephone: 01204 903435

Kay Loxham – Student Liaison Officer	Email: K.J.Loxham@bolton.ac.uk Telephone: 01204 903229
Luke Evans – Student Liaison Officer	Email: L.Evans@bolton.ac.uk Telephone: 01204 903541
<u>Designated Safeguarding Champions (DSCs)</u>	
Jason Pendlebury (Student Life, Sport and Wellness Centre)	Email: J.Pendlebury@bolton.ac.uk Telephone: 01204 903577
Kelly Squires (Division of Marketing, Recruitment and Admissions) (Events)	Email: K.Squires@bolton.ac.uk Telephone: 01204 903806
Danielle Ellis (Health and Human Sciences) – Bradford College Satellite Centre	Email: D.Ellis@bolton.ac.uk Telephone: 01204 903856
Shaun Kershaw (Health and Human Sciences) – Petroc College Satellite Centre	Email: S.Kershaw@bolton.ac.uk Telephone: 01271 852505
Martina Kirlew (Health and Human Sciences) – Social Work Centre, Queens	Email: M.Kirlew@bolton.ac.uk Telephone: 01204 903782
Laura Holt (School of Nursing and Midwifery)	Email: L.Holt3@bolton.ac.uk Telephone: N/A
Lucy Bradshaw (School of Nursing and Midwifery)	Email: L.Bradshaw@bolton.ac.uk Telephone: N/A
Sheryl Halliday (School of Nursing and Midwifery)	Email: S.Halliday@bolton.ac.uk Telephone: 01204 903846
Hayley Carr (School of Nursing and Midwifery)	Email: H.Carr@bolton.ac.uk Telephone: 01204 903282
Caroline Rawlinson (School of Nursing and Midwifery)	Email: C.Rawlinson@bolton.ac.uk Telephone: N/A
Sarah Renahan (School of Nursing and Midwifery)	Email: S.Renahan@bolton.ac.uk Telephone: N/A
Andrew Parker (School of Creative Technology)	Email: A.Parker@bolton.ac.uk Telephone: 01204 903467
Rachel Dawson (School of Arts)	Email: R.Dawson@bolton.ac.uk Telephone: 01204 903374
Leanne Lewis (School of Arts)	Email: L.Lewis@bolton.ac.uk

	Telephone: 01204 903379
Angela Tinwell (Research and Graduate School)	Email: A.Tinwell@bolton.ac.uk Telephone: 01204 903589
Anne Cleary (Clinical and Biomedical Sciences)	Email: A.Cleary@bolton.ac.uk Telephone: N/A
Linzi Robertson (School of Psychology)	Email: L.Robertson3@bolton.ac.uk Telephone: N/A
Brian Williamson (School of Engineering)	Email: B.Williamson@bolton.ac.uk Telephone: 01204 903725
Rachael Rogers (School of Engineering)	Email: R.Rogers@bolton.ac.uk Telephone: 01204 903533
Anna Williamson (School of Engineering)	Email: A.Williamson2@bolton.ac.uk Telephone: N/A
Lyndsey Malone (Faculty of Engineering, Arts & Creative Technologies)	Email: L.L.Malone@bolton.ac.uk Telephone: 01204 903602
Wendy Bateman (School of Law)	Email: W.Bateman@bolton.ac.uk Telephone: 01204 903679
Nuran Nahar (Business School)	Email: N.Nahar@bolton.ac.uk Telephone: 01204 903178
Clare Higgins (School of Education)	Email: C.Higgins@bolton.ac.uk Telephone: 01204 903316
Hannah Lovatt (School of Education)	Email: H.Lovatt@bolton.ac.uk Telephone: 01204 903382
Craig Lomas (School of Education)	Email: C.Lomas@bolton.ac.uk Telephone: N/A
Neil Moran (Off Campus)	Email: N.Moran@bolton.ac.uk Telephone: 01204 903627
Shameela Atcha (Apprenticeships)	Email: S.Atcha@bolton.ac.uk Telephone: 01204 903209
Lauren Smith (Apprenticeships)	Email: l.smith2@bolton.ac.uk Telephone 01204 903152
Adam Dietrich (Apprenticeships)	Email: A.Dietrich@bolton.ac.uk Telephone: 01204 903620
Pip Page (School of Clinical and Biomedical Sciences)	Email: P.Page@bolton.ac.uk

	Telephone: 01204 903676
Neil Berry (Facilities)	Email: N.Berry@bolton.ac.uk Telephone: 01204 903585
Alex Jones (Human Resources)	Email: A.Jones@bolton.ac.uk Telephone: 01204 903365
Janet Galligan (Students' Union)	Email: J.Galligan@bolton.ac.uk Telephone: 01204 906850
Caroline Bracewell (Standards and Enhancement Office)	Email: C.Bracewell@bolton.ac.uk Telephone: 01204 903854
Jake Stanworth (CBT Clinic, Life Lounge/School of Psychology)	Email: J.Stanworth2@bolton.ac.uk Telephone: 01204 903566
Lisa Norris (Shockout Arts)	Email: lisanorris@weareshockout.com Telephone: 0161 8339937
Renna Wilson (Shockout Arts)	Email: rennaewilson@weareshockout.com Telephone: 0161 8339937
<u>Other Key Contacts</u>	
(Senior) Designated Executive Safeguarding Lead and Prevent Lead	Sue Duncan Email: S.Duncan@bolton.ac.uk Telephone: 01204 903058
Designated Executive Safeguarding Lead	Caroline Cowburn Email: C.Cowburn@bolton.ac.uk Telephone: 01204 903032
Chief People Officer	Chris McClelland Email: C.McClelland@bolton.ac.uk Telephone: 01204 903572
Chair of Governors	Professor His Honour William Morris via Sharon Sturgess Email: S.Sturgess@bolton.ac.uk Telephone: 01204 903491
Nominated Safeguarding Governors	Name: Andrew Fawcett via Sharon Sturgess Email: S.Sturgess@bolton.ac.uk Telephone: 01204 903491 & Name: Susan Hincks via Sharon Sturgess

	Email: S.Sturgess@bolton.ac.uk Telephone: 01204 903491
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Key External Contacts/Safeguarding Partners

Designated Officer(s) of the Local Authority	<p>Lisa Kelly</p> <p>Bolton Safeguarding Children Board Westhoughton Town Hall Market Street Westhoughton BL5 3AW</p> <p>Email: Lisa.Kelly@bolton.gov.uk or LADO@bolton.gov.uk</p> <p>Telephone: 01204 337474</p>
Bolton Metropolitan Borough Council Multi Agency Screening and Safeguarding – The Integrated Front Door	<p>Email: R&A@bolton.ac.uk</p> <p>Telephone: 01204 331500</p> <p>Out of hours emergency Telephone: 01204 337777</p>
Bolton Safeguarding Adults Board	<p>Email: safeguardingadults@bolton.gov.uk</p> <p>Telephone: 01204 3370000</p>
Bolton Safeguarding Children Board	<p>Bolton Safeguarding Children Board Westhoughton Town Hall Market Street Westhoughton BL5 3AW</p> <p>Email: boltonsafeguardingchildren@bolton.gov.uk</p> <p>Telephone: 01204 337479</p>
Key Contacts for Bradford College	<p>Local Authority Designated Officer (LADO): Email: LADO@bradford.gov.uk Telephone: 01274 435600</p> <p>Multi-Agency Safeguarding Hub (MASH): Email: childrens.enquiries@bradford.gov.uk Telephone: 01274 435600 (Children) 01274 431077 (Adults)</p>
Key Contacts for Petroc College	<p>Local Authority Designated Officer (LADO): Email: childsc.localauthoritydesignatedofficersecure-</p>

	<p>mailbox@devon.gov.uk Telephone: 01392 384964</p> <p>Multi-Agency Safeguarding Hub (MASH): Email: mashsecure@devon.gcsx.gov.uk Telephone: 0345 1551071</p>
FGM Reporting	<p>Non-emergency Police Telephone: 101</p> <p>Bolton FGM Project – Bolton Solidarity Community Association Telephone: 01204 334004</p>
Police Liaison Officer/University point of contact	<p>PC Rick Charlesworth C/O Facilities University of Bolton Deane Road, Bolton, BL3 5AB</p> <p>Email: bolton.neighbourhoodteam@gmp.police.uk In an emergency: call 999</p>
Prevent Partners and advice about extremism	<p>Channel Police – Counter Terrorism Police North West (CTPNW) Please contact either Matt Dillon, Safeguarding Officer and Prevent Coordinator or Talin Aghanian, Safeguarding Officer and Deputy Prevent Coordinator for contact details for CTPNW. Email: channel.project@gmp.police.uk Telephone: 0161 856 6362</p> <p>Bolton Community Safety Team Email: community.safety.services@bolton.gov.uk</p> <p>Non-emergency DfE Advice Email: counter-extremism@education.gov.uk Telephone: 020 7340 7264</p>
UK Safer Internet Centre	<p>Email: enquiries@saferinternet.org.uk Telephone: 0344 800 2382</p>
NSPCC Whistleblowing Helpline	<p>Email: help@nspcc.org.uk Telephone: 0800 028 0285</p>

Appendix 9

University of Bolton Safeguarding Commitment Statement

The University of Bolton is fully committed to safeguarding the welfare of all members of its community, students including but not limited to those pursuing apprenticeships, undergraduate, postgraduate taught and postgraduate research and staff, irrespective of any protected characteristic such as gender, age, disability, sexual orientation, race, language, religion, ethnic or social origin. Safeguarding of our community extends to those students and staff who may work or study away from the Bolton campus for instance those university staff and students at satellite centres such as Petroc College or Bradford College and those university staff and students who work or study at Shockout, Manchester. The University is mindful of the particular safeguarding duties owed to specific vulnerable groups. In all its activities the University aspires to promote the safety and wellbeing of all members of its community.

The University also has an obligation to protect its members from the risk of radicalisation in accordance with the PREVENT duty.

As a Higher Education provider we recognise our responsibilities to take all reasonable steps to protect people from harm, abuse, neglect and/or exploitation.

All staff, students and volunteers with the University will endeavour to safeguard people by:

- Making members of the University community aware that we take protecting them and the public seriously and will respond to safeguarding concerns;
- Working together to encourage an ethos which embraces difference and diversity;
- Respecting and empowering people to be safe from harm and/or abuse;
- Recognising and reducing the risk to people experiencing domestic abuse;
- Sharing information about concerns with agencies who need to know and involving people appropriately in that sharing;
- Following national and local safeguarding children and adults policies and procedures including safe recruitment of all our staff;
- Providing effective management for our staff by ensuring they have access to supervision, support and training as appropriate to their identified need;
- Supporting people to make their own decisions and by making best interests decisions for those who cannot make decisions for themselves.;
- Working with employers of apprenticeship students and those on placement to ensure the employer is aware of our safeguarding arrangements, how to share a concern/make a referral and what support is available to any student studying at the University of Bolton.

The University is committed to working within agreed policies and procedures and in partnership with other agencies. The safety and welfare of children and adults at risk who come into contact with our services either directly or indirectly are paramount, and all staff have a responsibility to ensure that the University Safeguarding Policy and Procedure is followed, including compliance with statutory requirements.

Almost all members of the University community are adults and, therefore, the University expects and enables them to act appropriately and take responsibility for their actions, within the confines of the University's policies and procedures.

The University whilst not a health and care provider recognises the importance of and acts in accordance with the six principles of safeguarding first introduced by the Department of Health in 2011 but now embedded in the Care Act, these being:

- Empowerment – People being supported and encouraged to make their own decisions and informed consent.
- Prevention – It is better to take action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities. Communities have a part in preventing, detecting and reporting neglect and abuse
- Accountability – Accountability and transparency in safeguarding practices.

The University of Bolton's Safeguarding Policy and Procedure details our approach to safeguarding and can be found here: <https://www.bolton.ac.uk/student-policy-zone>

For further information or to share a safeguarding concern please email: safeguarding@bolton.ac.uk

Appendix 10

University of Bolton Guidance on Raising and Reporting Low-Level Safeguarding Concerns and Supporting Students and Staff with Pastoral and Welfare Related Issues

1 The purpose of this guidance

- 1.1. Keeping Children Safe in Education 2023 notes the importance of creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person.
- 1.2 Concerns which do meet the threshold if deemed a Safeguarding concern would be reported and dealt with in accordance with the University's Safeguarding Policy and Procedure.
- 1.3 The term low-level concern is sometimes incorrectly applied to students and staff experiencing pastoral and or welfare related issues. This guidance should support staff in distinguishing between the two and in responding to both.

2 Who is this guidance for?

- 2.1 All adults (staff, students and volunteers) whose work will involve contact with children i.e., those under the age of 18 and/or adults at risk (previously vulnerable adults), this includes students on placement and apprentices in employment who work with children and adults at risk.

This guidance should be read in conjunction with the University of Bolton Safeguarding Policy and Procedure which details in full the University's full responsibilities in relation to safeguarding children and adults at risk and confirms how to raise a safeguarding concern.

In addition, the following policies and procedures should be read in conjunction with this guidance:

- Staff Disciplinary Procedure
- Student Non-Academic Conduct Policy and Procedure
- Student Fitness to Practice Policy
- Student Health, Wellbeing and Supported Study Policy (HWSS)
- Public Interest Disclosure Policy

3 What are Low-level concerns?

- 3.1 Keeping children Safe in Education 2023 identifies a low-level concern as any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working on or on behalf of the University including a student on a placement or an apprentice in employment may have acted in a way that is inconsistent with our policies and procedures and relevant codes of conduct as identified above. This could include inappropriate behaviour outside of work.

3.2 A low-level concern may not meet the 'harm threshold' for referral to the Local Authority Designated Officer (LADO) or to other statutory safeguarding partners. The harm threshold is an allegation that means that a person who works with children/adult at risk has:

- behaved in a way that has caused harm, or may have caused harm
- possibly committed a criminal offence against or related to a child/adult at risk; and/or
- behaved towards a child or children/adult at risk in a way that indicates they may pose a risk of harm to children/adult at risk; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children/adult at risk.

Examples of low-level behaviour would include, but is not limited to:

- Not adhering to professional standards/codes of conduct relevant to the role/workplace including but not limited to placements
- Observing someone not adhering to codes of conduct and or codes of practice in relation to their work with a child or adult at risk e.g., a student nurse on placement not adhering to professional practice
- Being over friendly with children or adult at risk, not applying boundaries in terms of relationships
- Having favourites
- Taking photographs of a child/adult at risk on a personal mobile phone
- Engaging with a child on a one-to-one basis in a secluded area
- Humiliating the individual
- Using discriminatory language including language which may cause offence or inappropriate sexualised or intimidating language.
- Inappropriate conduct outside of the workplace
- Inappropriate touching of a child or adult at risk

3.3 Low level concerns may arise as a result naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

4 Reporting a Low-Level Concern?

4.1 The University has a legal duty to keep children and adults at risk safe and protect them from abuse/harm. The reporting of a low-level concern i.e., the behaviour of a staff member employed at the University, a contractor employed on behalf of the university, an official visitor, student on placement or an apprentice in work could be an opportunity for training and process improvement not dissimilar to "near miss" reporting applied to the broader health and safety of the University community.

4.2 Individuals raising a concern do not need to determine if it meets the harm threshold, but they do have an obligation to raise any safeguarding observation as part of our proactive safeguarding culture.

4.3 Individuals may self-refer an issue of concern. The raising of low-level concerns is a professional dialogue in line with good practice and should provide opportunities for shared learning. It is an important step if the adult has found themselves in a

situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

4.4 Who to report to (see Appendix 10.1)

Concern relates to:	Report to:
Member of staff employed by the University	Email: HR@bolton.ac.uk
Contractor working on behalf of the University	Email: HR@bolton.ac.uk
Student on placement	Email: safeguarding@bolton.ac.uk
Apprentice	Email: safeguarding@bolton.ac.uk
Students who volunteer	Email: safeguarding@bolton.ac.uk

4.5 Information to report/include with the email referral

Reports should:

- provide a concise record including a brief context in which the low-level concern arose
- include details of who was involved
- include details of witnesses
- include dates, time, location
- include details of what you feel is unprofessional behaviour/conduct
- include details which are chronological, and as precise and accurate as possible of any such concern and relevant incident(s)

If in doubt if the concern is a low-level safeguarding concern or a safeguarding concern, please complete the Safeguarding Referral form available in appendix 5 of the Safeguarding Policy and Procedure. A member of the Safeguarding Team will then make an informed decision if the referral constitutes a safeguarding concern/allegation or a low-level safeguarding concern, in accordance with section 4.6 and 4.8.

Reports should be made in a timely fashion, within one working day of the incident.

4.6 Responding to a report:

On receipt of a report the following actions may be taken:

- speak to the person who raised the concern
- speak to any potential witnesses (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted)

- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted)
 - review the information and determine whether the behaviour:
 - i. is consistent with relevant code of conducts/expectations of the university
 - ii. constitutes a low-level concern
 - iii. is not serious enough to consider a referral to the local authority/external safeguarding partners – but may merit consulting with and seeking advice from them
 - iv. when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority external safeguarding partners
 - v. in and of itself meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional.
- 4.7 Staff receiving reports of low-level concerns may be required to seek advice and share information with their manager, the employee’s manager, the students Head of School or Dean of Faculty, staff from the Safeguarding Team, the Apprenticeship Team, the placement provider or employer for apprentices. Information will only be shared on a need-to-know basis, to support decision making, inform of next actions/implementation of other policies or training and to support individuals involved.
- 4.8 When receiving a Low-Level Concern, the University of Bolton will:
- ensure all concerns that are raised are handled sensitively and proportionately
 - aim to respond to all concerns raised with in two working days
 - undertake to weigh up information in order to distinguish between unprofessional behaviour and intentional harm or abuse i.e., establish if it is a low-level safeguarding or a safeguarding concern which would be dealt with in accordance with the University of Bolton’s Safeguarding Policy and Procedure
 - identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the local authority dedicated officer (LADO) or equivalent safeguarding partner/officer
 - focus on the behaviour, not the language used to describe or report it
 - address unprofessional behaviour and support the individual to correct it at an early stage
 - identify any areas for development in our safeguarding system as well as any training needs
 - review the report against the relevant staff or student policies as listed earlier in this guidance. The instigation of these policies may be required depending on the nature of what was reported.
- 4.9 Records should be retained locally by the person receiving the report in a safe, secure and confidential manner. Records will be kept confidential (shared only on a need-to-know basis) and will be held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records will also include all actions taken plus the rationale for the decisions made. Such records

may be made available to other organisations as required noting this is a non-exhaustive list:

- Regulatory bodies such as the Office for Students and or Ofsted
- University Insurers
- Health and Safety Executives
- Other University staff as required e.g., Head of School, Dean of Faculty, Personal Academic Tutor, Programme Lead or Line Manager

4.10 Records will be retained for the duration of the persons employment or studies and for 6 years beyond the completion of this.

5 Further Advice on Low Level Concerns

5.1 If your concern relates to a potential Low-level Safeguarding Concern for a university employee or university volunteer further advice is available from your Head of Service, Head of School, Dean of Faculty or Human Resources.

If your concern relates to a potential Low-level Safeguarding Concern for a student including apprentices you can speak with your Designated Safeguarding Champion, a Senior Designated Safeguarding Champion, Deputy Safeguarding Officer, Safeguarding Officer, Head of School, Dean of Faculty or colleagues in the Standard Enhancement Office

6 Student Pastoral and Welfare Issues

6.1 The Department of Education (DfE) states that universities currently have a general duty of care to deliver educational and pastoral services to the standard of an ordinarily competent institution and that in doing so they are expected to act reasonably to protect the health, safety and welfare of their students. This can be summed up as providers owing a duty of care to not cause harm to their students through the university's own actions.

6.2 When staff become aware of a student experiencing pastoral or welfare related issues, they should look to support the individual to the best of their abilities, recognising professional boundaries and signposting or referring to specialist professional support services as required. Records of support provided, advice given, signposting or onward referrals should be retained locally by the staff providing this advice. Academic colleagues can retain such records using Pulse, see 6.5.

6.3 All students are allocated a Personal Academic Tutor (PAT). The aim of the PAT is to support students achieve their academic and personal aspirations. PATs are able to advise students on academic issues and pastoral issues including those affecting a student's health or wellbeing.

6.4 Students will often seek pastoral support from staff with whom they have built a relationship or have regular contact, this could include academic staff who are not Personal Academic Tutors.

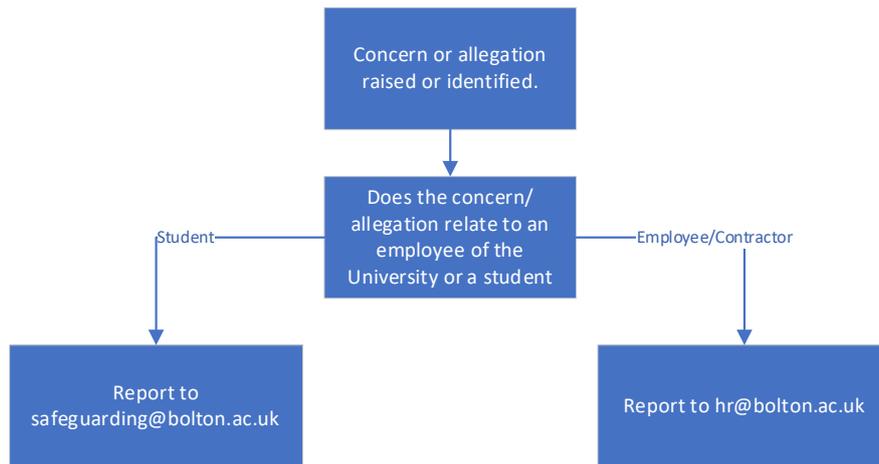
6.5 All advice of a pastoral nature given by academic colleagues should be logged in Pulse unless it is sensitive. If the advice is of a sensitive nature a record should be entered in to Pulse that summarises that confidential advice has been given and whom can be contacted for further information on a need-to-know basis.

- 6.6 All academics including PATs can refer students to professional support services listed in 6.7 using the MyBolton App
- 6.7 All students have access to additional professional support services including:
- Life Lounge (Student Mental Health and Wellbeing)
 - Disability Team
 - Student Funding
 - Student Advisors
 - International Student Advisors
 - Student Liaison Officers
 - Library including Subject Librarians, Learning Excellence Achievement Pathway (LEAP) Online and Live
 - Careers Service and Employability
 - Chaplaincy
 - Students' Union
- 6.8 In the event a pastoral or welfare related issue is reported to the Senior Designated Safeguarding Champions, Deputy Safeguarding Officer or Safeguarding Officer via safeguarding@bolton.ac.uk or a Designated Safeguarding Champion Safeguarding Reporting Form and the concern does not constitute a safeguarding concern then the following actions may be taken
- the person making the report will be offered advice on how best to support the individual for whom a concern has been raised
 - if appropriate the person for whom a concern has been raised may be contacted directly by a member of the safeguarding team.

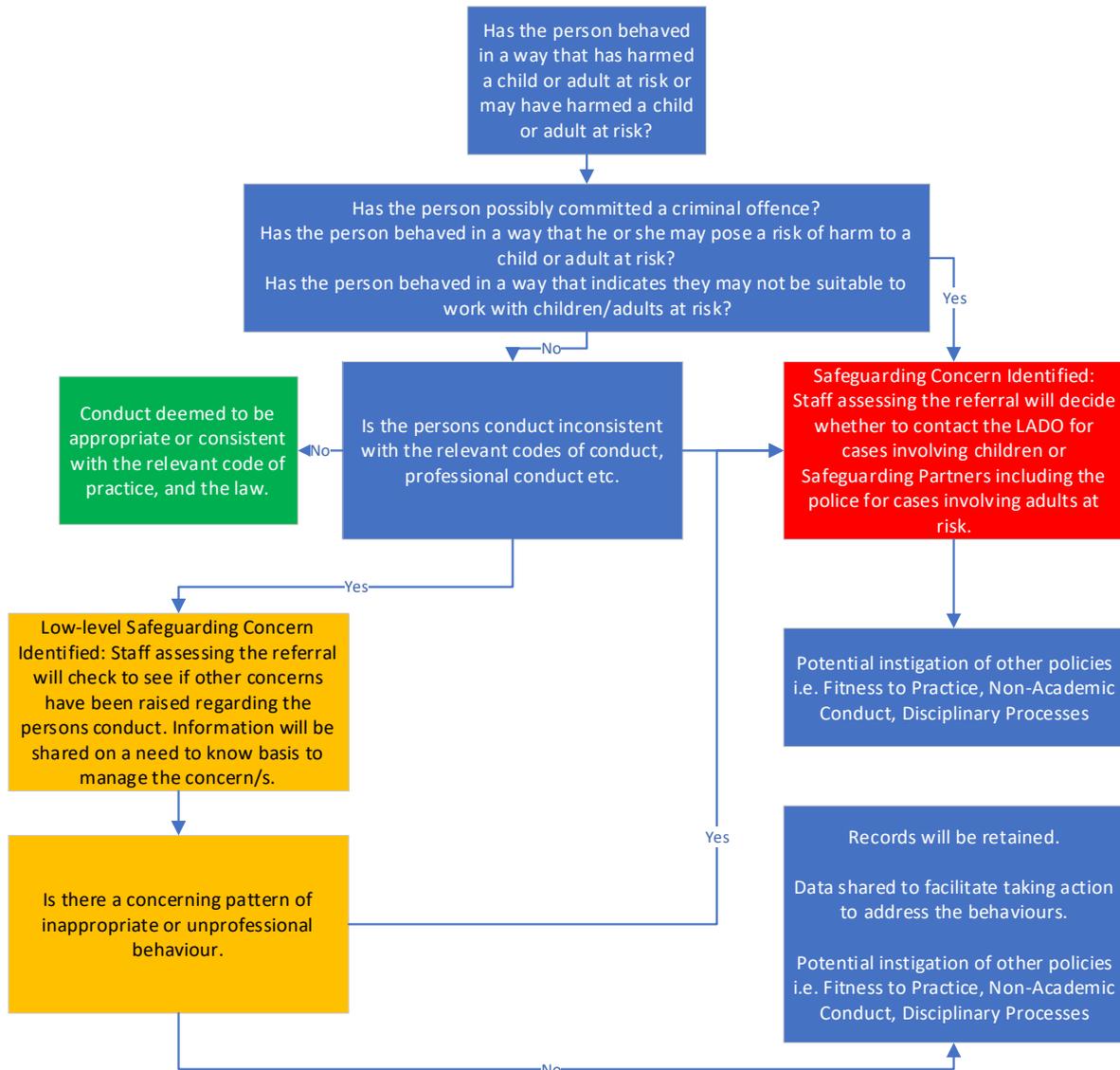
7 Staff Pastoral and Welfare Issues

- 7.1 The University takes the health, safety and wellbeing of its staff seriously and understands that safeguarding issues can affect the wellbeing of staff involved.
- 7.2 Staff should never be afraid to ask for appropriate advice and guidance if they are unsure of what action to take. Confidential advice can be given by the relevant local Designated Safeguarding Champion, Heads of School / Service or relevant HR Safeguarding Champion. Further details are contained in the Safeguarding Policy as updated from time to time.
- 7.3 Staff affected by any aspect of any low-level safeguarding case / process can also access the University Employee Assistance Programme provider, Spectrum Life. The contact details can be found via the HR A to Z.
- 7.4 If it is alleged that a member of staff has breached any aspect of this guidance or the Safeguarding Policy an investigation may be carried out in line with the staff disciplinary procedure.

Low-level Safeguarding Concerns Reporting Process



Managing Low-level Safeguarding Concerns Process



Safeguarding Policy and Procedures: Children and Vulnerable Adults	
Procedure Ref : StuSer/01	
Version Number	19
Version Date	02/05/24
Name of Developer/Reviewer	Head of Student Services and the Student Mental Health and Wellbeing Manager
Procedure Owner (School/Centre/Unit)	Student Services
Person responsible for implementation (post holder)	Assistant Vice-Chancellor (Transformation)
Approving Committee/Board	Board of Governors
Date approved	12/05/23
Effective from	Mar 2016
Dissemination Method (e.g. website)	Staff and Student web pages
Review Frequency	Annually or as required
Reviewing Committee	Safeguarding and PREVENT Working Group.
Document History (e.g. rationale for and dates of previous amendments)	<p>Consultation has taken place with all Heads of Schools, several Heads of Support Services, HR and the SU throughout March 2016. Technical update November 2016 to account for the inclusion of apprentices. Technical Update June 2017 to add a DSC. Technical Update March 2018 to change a DSC.</p> <p>Technical Update March 2019 to change a DSC, Amian to Vivup and additional details of Board of Governors responsibilities and change of Vulnerable Adult to Adult at Risk</p> <p>Technical Update November 2019 to include the role of SDSC, minor change of reporting structure, inclusion of contact details (internal and external)</p> <p>External Health Check – VVW November 2019 – minor changes to wording, updated DPA/GDPR, reorganisation, updated details of sharing information with other organisations. Reviewed in accordance with Ofsted Requirements. Consultation has taken place with HR.</p> <p>March and June 2020 – Review of Policy no changes. Annex to Policy in response to COVID-19 Pandemic approved July 2020.</p> <p>August 2021 – Review of policy no changes.</p> <p>February 2022 – Review and minor technical</p>

	<p>updates undertaken. Legislation names/dates changed (Domestic Abuse Act 2021). Technical positions/named positions changed. Change to referral form/reporting a concern form. Inclusion of training cycle i.e. each 3 years for named staff within the policy. Change of logo. Technical changes approved by the University Safeguarding and Prevent Group.</p> <p>May 2022- Change of SO and DSO and updates to training frequency of Executive Leads, SO and DSO.</p> <p>November 2022 – Updated list of champions.</p> <p>February 2023 – Change of Key Contacts</p> <p>April 2023 – Revisions to reflect changes in roles, updated information relating to apprenticeships, minor changes to reference new legislation, changes to staff training to reflect and codify the decisions of Safeguarding and PREVENT Working Group, updated information on promotion of the policy and inclusion of LEAP Module information. Approved by the University of Bolton Safeguarding and PREVENT Working Group 27/04/23.</p> <p>May 2023 – Updates to include the 6 principles of Safeguarding and technical amends to section 7.</p> <p>May 2023 – Change of one DSC.</p> <p>October 2023 – Technical Updates: change to DSCs, reference to level of training for named positions, response times to allegations/concerns raised</p> <p>January 2024 – Inclusion of the Commitment Statement and updates to the Appendix 8</p> <p>May 2024 – Inclusion of the Low Level Safeguarding Concerns Guidance and updates to the Appendix 8</p>
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