



St Mary's  
University  
Twickenham  
London

## St Mary's University

### Safeguarding policy

#### Children, Young People and Vulnerable Adults

1	Background	2
2	Scope	2
3	Definitions	4
4	Roles & Responsibilities	7
4	Expectations and procedures	8
4.1	Safeguarding Vulnerable Groups and DBS service	8
4.2	Recruitment	8
4.2.1	DBS	9
4.3	Filming and photography	10
4.4	Social media	11
4.5	Training and development	11
4.6	Incident of abuse or causes for concern	12
4.7	Responding to concerns, allegations and incidents	12
5	Monitoring and evaluation	13

## 1. Background

St Mary's University aims to provide a safe environment for children, young people and vulnerable adults to reside, visit and take part in a range of sporting, educational and cultural events. Safeguarding, child protection and the welfare of children, young people and vulnerable adults are very important to the University. The development of the St Mary's First Star Academy (FSA), Sport St Mary's (SSM) summer camps and children's activities and increased conferencing and event activity have placed the safeguarding needs of these groups to the fore.

St Mary's University believes that a child, young person or vulnerable adult should never experience abuse or harm of any kind. We have a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe. We are committed to practise in a way that protects them. We recognise our responsibility to develop awareness of safeguarding issues and are committed to practice that reflects the University's duty of care and protects children, young people and vulnerable adults from harm.

St Mary's University expects that all staff, coaches, students, volunteers and external hirers accept the fundamental principle and legal requirement that, in any given situation, the welfare of the child (any young person under the age of 18) or vulnerable adult is paramount.

## 2. Scope

The purpose of this policy:

- To protect children, young people and vulnerable adults who receive St Mary's University's services or the services of organisations / individuals hiring St Mary's facilities.

This policy applies to all staff and students of the University.

- All persons whose normal place of work is on premises of the University
- All registered students at the University (whether full-time or part-time)
- The St Mary's University Students' Union (SMSU), and any of its constituent societies, clubs and associations
- The officers and employees of the SMSU
- All bodies or persons not associated with the University who hire or otherwise use the University's facilities
- Volunteers and sessional workers/HPA's
- Those who are associated with First Star Academy and Sport St Mary's.

The policy applies to activities which take place:

- On University premises
- During off-site placements, and

- Other off-site activities organised or supported by the University

St Mary's University organises and provides facilities for an extensive range of activities that involve staff, students volunteers and external organisations/individuals working with children, young people and vulnerable adults both on and off our campus. This policy has particular importance for staff, students and volunteers working with:

- The St Mary's First Star Academy;
- Sport St Mary's activities
- Conferencing and external clients
- Widening access school students

**This policy should be read alongside guidance and procedures:**

- I. St Mary's University Safeguarding Policy
- II. Guidance on recognising types of abuse and harm
- III. Guidance on responding to concerns, allegations and incidents
- IV. Documentation retention and handling policy (including DBS)
- V. First Star Academy guidance, codes of conduct and procedures
- VI. Sport St Mary's guidance, codes of conduct and procedures
- VII. Conferencing guidance

We recognise that:

- the welfare of the child is paramount, as enshrined in the Children Act 1989;
- all children and young people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;
- working in partnership with children, young people, vulnerable adults, their parents, carers, local authorities, children's services, social care and other agencies is essential in promoting their welfare;
- all children, young people and vulnerable adults should be involved in decisions, whenever it is possible and appropriate;

- abuse can have serious long-term effects in terms of development, health and well-being including to self-esteem and self-image;

We will seek to keep children, young people and vulnerable adults safe by:

- appointing a University safeguarding officer and lead safeguarding officers with responsibility for children, young people and vulnerable adults;
- adopting child protection and safeguarding practices through procedures, training and codes of conduct for staff and volunteers;
- valuing and respecting children, young people and vulnerable adults;
- believing that all children, young people and vulnerable adults should be listened to and heard;
- taking all concerns, suspicions or allegations of abuse seriously and responding swiftly and appropriately;
- providing effective management for staff, students and volunteers through supervision, support, training and quality assurance measures; including for safeguarding leads;
- recording and storing information professionally and securely, and sharing information about safeguarding and good practice with children, young people, vulnerable adults, families, staff, carers and volunteers;
- using our procedures to manage any allegations against staff and volunteers appropriately;
- implementing appropriate procedures for responding to accidents, incidents, and alleged or suspected harm;
- ensuring that bullying is not accepted and maintaining an anti-bullying environment through policies and procedure to help us deal effectively with any bullying that does arise;
- implementing carefully the procedures for recruitment and selection of staff, students and volunteers who may be in contact with children or vulnerable people, including Disclosure and Barring Scheme (DBS) checks;
- ensuring that users of the facilities at St Mary's are aware of and adhere to our procedures;

- ensuring that we provide a safe physical environment for our children, young people, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance;

### 3. Definitions

**Child** - Under the terms of the Children Act 1989 a '*child*' is defined as anyone under the age of 18 years. For the purposes of this policy a child and young person are both considered to be under 18 years of age.

**Vulnerable Adult** – refers to any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. It should be noted that the definition of a vulnerable adult means that this can be a transient category for some individuals. It is difficult to give an exhaustive list of those who may be considered 'vulnerable adults', so what follows is intended to be indicative only:

- People who do not have the mental capacity to make decisions about their own safety
- People who have communication difficulties
- People who are physically dependent on others for personal care and activities of daily life
- Those who have experienced abuse / childhood abuse
- Those living in an environment marked by domestic violence or drug misuse
- Those living in sheltered or temporary accommodation
- Migrants or people are seeking refugee status
- Victims of trafficking
- Individuals who have a history of bullying and/or abuse
- Care Leavers or young carers
- Someone subject to forced marriage

**Volunteers** - someone spending time, unpaid, doing something that aims to benefit other people or the environment.

**Visitors** - Including clients, external groups, organisations, visiting children and individuals in any kind of capacity.

**Safeguarding** is the action that is taken to promote the welfare of children, young people and vulnerable adults and to protect them from harm. Defined as:

- Protecting children and vulnerable adults from abuse, bullying and maltreatment.
- Preventing harm to a child or vulnerable adults' health or development.
- Ensuring children grow up with the provision of safe and effective care.

- Taking action to enable all children and young people to have the best outcomes.

**Child protection** is protecting individual children identified as suffering or likely to suffer harm. This includes child protection procedures which detail how to respond to concerns about a child and forms part of the safeguarding process.

**Bullying or abuse** is when a situation arises where a child, young person or vulnerable adult behaves inappropriately to another vulnerable person. A decision must be made whether the behaviour constitutes bullying or abuse and thus is a child protection concern. Neither is acceptable. All forms of bullying will be addressed.

Bullying will be addressed through the medium of the Director (First Star) or Manager (Sport St Mary's). If the bullying occurs the safeguarding officer and staff responsible for day-to-day working with the vulnerable person and the manager/director of the service, must consult to consider if a referral to local authority services is necessary. Situations of significant harm, the perception (by the victim) that the behaviour is abusive, sexual abuse, most physical assaults and repeated patterns of incidents should be considered as abuse.

Informing the decision. NSPCC guidelines suggest that attention should be given to:

- The difference of power; often relatively small between bully and victim;
- Bullying may be from a number of individuals working as a group;
- Bullying behaviour may be directed towards a group of individuals;
- Bullying behaviour includes: excluding someone from games and conversations, making fun of someone, pressuring others into ignoring and not being friends, spreading hurtful rumours, cyber bullying, shouting, stealing possessions, making threats based on ['protected characteristics' under the Equality Act 2010](#).

St Mary's University, FSA and SSM staff and volunteers will support the child, young person or vulnerable adult following an incident of bullying by:

- Providing a safe environment for children who wish to talk about bullying or any other issue that affects them and carefully listening to them.
- Displaying the relevant helpline numbers and providing information on other relevant agencies.
- Objectively investigating any reported incidents of bullying.
- Supporting and assisting children being bullied by upholding their right to study, play and live in a safe environment which allows their healthy development.
- Supporting and encouraging those that bully to stop bullying.
- Prohibiting the implementation of sanctions for those bullying others that involve long periods of isolation, or which diminish and make individuals look or feel foolish in front of others.
- Supporting parents/carers by clearly advising them of this policy and the anti-bullying procedures in place.
- Discussing any incident of bullying with the child's parent/carers.

- Consulting parents/carers of the action to be taken (both victim and bully) and agreements made as to what action should be taken during sports sessions. Where this relates to third-party use, the nominated third-party users Safeguarding and Welfare Officer will undertake the consultation.
- Where staff or volunteers suspects that a child, young person or vulnerable adult is or has been subjected to bullying or discloses an incident, they must report it using the Safeguarding Reporting Form and follow the reporting process outlined in the guidance for responding to concerns, allegations and incidents.

Sexual abuse or normal experimentation?

Individual staff, students or volunteers should not seek to make judgements regarding the nature of children's developing interest in their own sexuality. Any concern should be reported to the Designated Safeguarding Officer (DSO). NSPCC guidance suggests that where there is a significant difference in age, power relationship or understanding, the use of threats or bribes or the behaviour occurs in secret then the concern should be discussed with the local authority children's social care department.

#### 4. Roles & Responsibilities

The University has nominated staff to assume responsibility for safeguarding children, young people and vulnerable adults. These include:

**Lead Safeguarding Officers (LSOs)** - have overall responsibility for the strategic and operational implementation of the policy and guidelines. The LSO fulfils a 'facilitative' rather than investigative role. Likewise, where issues about wider protection are not the responsibility of the University, e.g. when a student discloses childhood sexual abuse, the University may enquire about the potential risk for others, but it is the responsibility of the Local Authority and / or the police to ensure that others are not at risk of abuse from an alleged abuser. The roles and responsibilities of Lead Safeguarding Officers (LSOs) are currently divided between the following areas:

- **Registrar** with responsibility for students (including those under 18)
- **Head of Student Services** with responsibility for vulnerable adults (excluding staff members)
- **Academic Director for Enterprise & Development** with responsibility for First Star Academy
- **Director of Sport** with responsibility for those engaged in activities organised by Sport St Mary's
- **Director of Facilities** with responsibility for visitors, including visiting children

- **Head of Human Resources** with responsibility for vulnerable adults who are staff members

**Designated Safeguarding Officers (DSOs)** - Each school and service will have a DSO responsible for providing immediate support and for liaising with the relevant Lead Safeguarding Officer. The University will ensure that all staff are aware of their responsibilities and, where appropriate, will provide training in safeguarding and Prevent Duty awareness for staff (however appointed or engaged), in line with current policy, procedures and professional guidance.

**Senior Management Lead – Senior Director of People** - with responsibility for ensuring suitable safeguarding policies and procedures are in place.

### **Safeguarding Working Group**

The group monitors the implementation of the policy and keeps the policy and guidelines under review, ensuring that new guidance is incorporated as required, e.g. in line with legal requirements and appropriate guidance.

## **5. Expectations and procedures**

Staff, students and volunteers working with children, young people and vulnerable adults are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child, young people and vulnerable adults.

This guidance will be included with and referenced in other University policies and procedures in induction and resource packs and on the University webpage. Relevant staff, students, coaches, student ambassadors and volunteers will be informed during recruitment and induction processes and will be provided with a level of training appropriate to their responsibilities and the risks involved. The policy and other relevant safeguarding guidance will also be provided to external organisations hosting events at the University involving children, young people or vulnerable adults.

### **5.1 Safeguarding Vulnerable Groups Act 2006 and Disclosure and Barring Service**

The Safeguarding Vulnerable Groups Act (England and Wales) 2006, established the Independent Safeguarding Authority (ISA) now the Disclosure and Barring Service (DBS) to make decisions about individuals who should be barred from working with children and to maintain a list of these individuals. St Mary's adopts a safer recruitment approach for those working with vulnerable people. St Mary's University has a duty to be aware of all the spent and unspent criminal records of individuals who are appointed to positions considered exempt under the

Rehabilitation of Offenders Act 1974. Requests to the DBS for information about criminal convictions for both new and existing staff may only be made staff who have been approved by the DBS as counter signatories.

## **5.2 Recruitment of Staff and Volunteers**

The University recognise that implementing certain recruitment, appointment and induction procedures for staff and volunteers is vital to protecting children, young people and vulnerable adults from abuse or harm. We have a responsibility to take reasonable steps to ensure that staff and volunteers working with children, young people and vulnerable adults do not present a risk of harm to them.

The procedure for the recruitment of staff that have a high probability of working with or being responsible for children and vulnerable adults is as follows:

- Applications must be via a fully completed application form or detailed CV..
- Verification of qualifications by checking original certificates.
- Providing a minimum of two references. At least one reference must be able to comment upon the candidate's ability to work safely with children and/or vulnerable adults.
- Before appointment to paid roles, evidence must be provided to confirm identity (as per the most up to date guidance on this).
- First Star or SSM induction including review of this document alongside other relevant policies and documentation.

*The procedure for the recruitment of volunteers is as follows:*

- Applications must be via a fully completed application form or detailed CV.
- All regular volunteers (4 or more sessions) are required to complete a DBS check. This will be required following their first voluntary session should they wish to continue volunteering
- Providing a minimum of two references. At least one reference must be able to comment upon the candidate's ability to work safely with children and/or vulnerable adults.
- Full First Star or SSM induction including review of this document alongside other relevant policies and documentation.

### **5.2.1 DBS checks**

All (staff, coaches, students, visiting staff and volunteers) involved with St Mary's FSA and SSM activities involving 'regulated activity' must be the

holder of a St Mary's Enhanced DBS. Those who may have the opportunity for unsupervised contact with these groups must be the holder of a St Mary's Enhanced DBS where deemed appropriate.

No volunteer or member of FSA or SSM coaching staff without a valid DBS will be allowed to deliver unsupervised activities to children, young people or vulnerable adults.

DBS checks for third party users (SSM/conferencing) are detailed in relevant sections of SSM/Events policies. DBS requirements are confirmed in the terms and conditions for hiring of facilities;

The University will treat all criminal disclosures carefully and confidentially and seek the guidance of HR in ensuring appropriate responses to any criminal records, in compliance with the DBS code.

*What is regulated activity?*

A person will be considered to be engaging in regulated activity if, as a result of their work, they:

- will be responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children;
- will carry out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children;
- engage in intimate or personal care or overnight activity, even if this happens only once.

(Code of Practice for the DBS, 2015)

The university may obtain an enhanced DBS certificate (not including barred list information), for staff and volunteers who are not engaging in regulated activity but have the opportunity to come into unsupervised contact with children or come into contact with children on a regular basis, e.g. supervised volunteers. The Safeguarding Vulnerable Groups Act 2006 states that if the person carrying out the activity does so at any time on more than three days in any period of 30 days it should be regarded as regulated activity.

The Safeguarding Vulnerable Groups Act 2006 also imposed the legal requirement on employers to refer to the DBS information about employees or volunteers who (may) have harmed children while working for them.

### **5.3 Filming and photography**

St Mary's does not advocate the banning of photography of children, young people and vulnerable adults but this policy aims to ensure safeguards are in place to ensure safe sporting and learning environments. This section will help to ensure that all necessary steps are taken to protect children, young people and vulnerable adults from inappropriate use of their images in resources and media publications, on the internet and elsewhere. This applies whether images are taken using cameras, mobile phones or any other equipment.

- FSA requires that the taking of images and films in First Star settings

should be managed – young people taking selfies and other peer to peer photography is discouraged;

- SSM procedures (see SSM procedures part 6) provides details of accreditation and permissions required to record/photograph sports events;
- Written permission to take, retain and publish photographs must be sought from the children, young people or vulnerable adults as well as their parents/carers;
- No photographs or video material may be taken of the young people without the express prior consent of the appropriate Director (FSA) or the manager/designated authority (SSM) and the completion of appropriate consent forms;
- No covert photography is permitted under any circumstances;
- No photos or videos may be published on (including university) social media without the express consent of the Director/Manager (FSA or SSM) and appropriate consent obtained from both the individual and their parents/carers;
- Images of children, young people and vulnerable adults may only be taken using university approved equipment\*;
- Care must be taken when allowing photography where the location of a vulnerable young person might be released;
- \*Staff are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of young people from FSA or SSM activities other than with the express permission of the Director/Manager. Images must then be transferred immediately and solely to the university's network and then deleted from the staff device.

#### **5.4 Social Media**

All (staff, coaches, students, visiting staff and volunteers) should observe university social media policy and in addition:

- should not allow parents or children and young people to add them as a friend, nor must they add them as friends on social networking sites except where the site is established as a closed group for the purposes of the activity;
- must not create, transmit, display or publish any material that is likely to identify children and young people associated with FSA or SSM;
- must not place any information regarding activities or individuals related to the FSA on any social networking or internet site;
- Staff and volunteers should not use mobile phones during FSA or SSM activity, reserving their use times when they are off duty.

#### **5.5 Training and Development**

St Mary's recognises the need for ongoing training and development of staff and volunteers in relation to safeguarding and child protection issues.

- All relevant staff and volunteers are required to complete the appropriate induction. This includes a Safeguarding Awareness course.
- The delivery of training will be tailored to support each role within the university safeguarding structure;
- Relevant staff, LSO(s) and DSO(s) will receive dedicated training to support their role and remain up to date on all matters relating to safeguarding and child protection.

### **5.6 Incidents of abuse or causes for concern**

Any incidents which cause concern in respect of a child, young person or vulnerable adult are required to be reported immediately to a Lead Safeguarding Officer. Below are examples of incidents which are required to be reported. When:

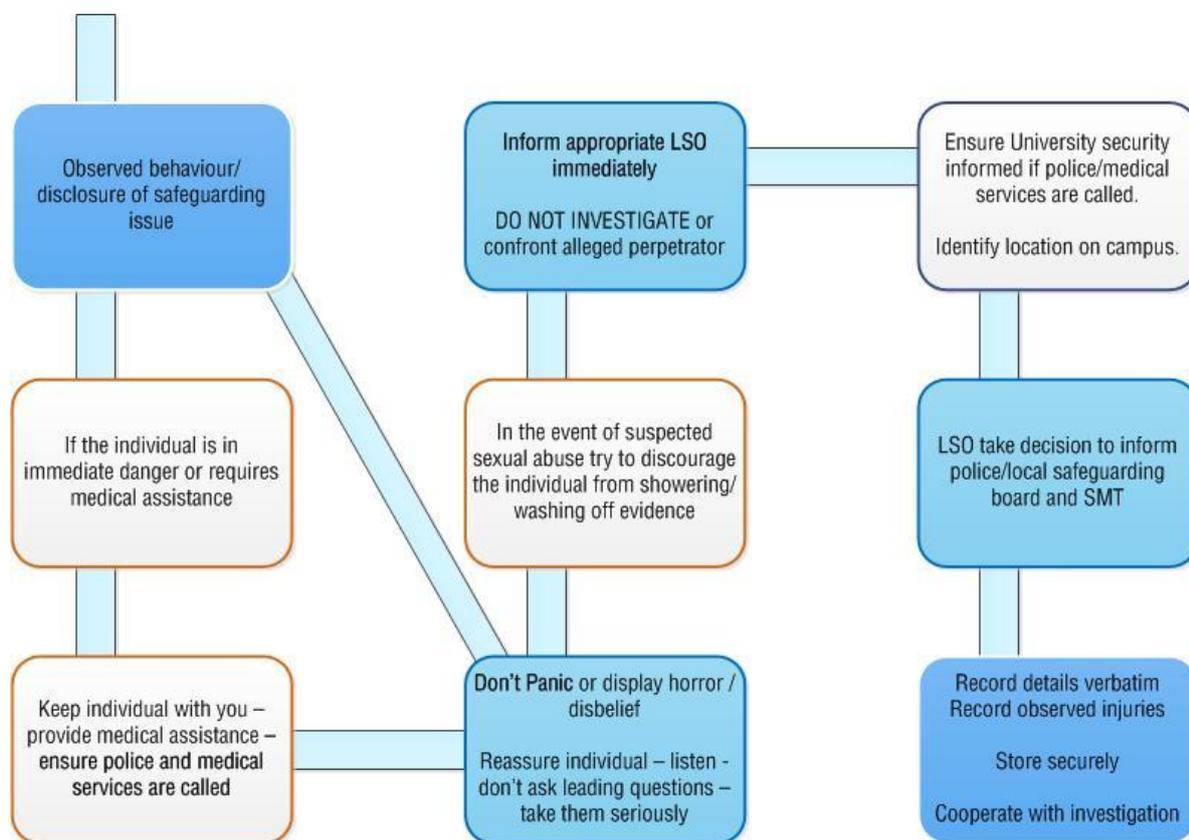
- a child, young person or vulnerable adult is accidentally harmed or injured;
- there is a concern that a relationship is developing which may be an abuse of trust;
- you are worried that a child, young person or vulnerable adult is becoming attracted or overly familiar with you or a colleague or that they may have misunderstood or misinterpreted something you have done;
- you have been required to physically restrain a child, young person or vulnerable adult to prevent them from harming themselves or another or from causing significant damage to property;
- you observe or hear of allegations regarding a staff member, volunteer or a member of an external organisation using the Universities' facilities;
- you see any suspicious marks on a child, young person or vulnerable adult;
- you observe behaviour by a member of staff or volunteer which is concerning or which breaches a University Code of Conduct;
- a child, young person or vulnerable adult shares concerns with you that might indicate that they are being groomed, harmed or are at risk of harm;
- you hear of any allegations made by a child or young person of events outside St Mary's University (eg at school);

### **5.7 Responding to concerns, allegations and incidents**

It is not expected that individual staff will report allegations to or engage with children's services, social care department or the police except where the concern is immediate and an individual is at risk or during follow up investigations.

All concerns to be reported to the Lead Safeguarding Officer for action. Procedures to be followed are identified in the guidelines for responding to allegations and safeguarding training.

The following flow chart gives an overview of handling immediate situations.



## 6 Monitoring and Evaluation

The Safeguarding Working Group will review this policy and any associated procedures as the need arises due to legislative changes, external advice and/or to ensure better operational effectiveness.

### Further support is provided through Safeguarding procedures for SSM and FSA including:

- Contact information = designated safeguarding officer / leads
- Emergency information sheet – First Star Academy
- Emergency information sheet – St Mary's coaching and kids clubs
- Form for reporting concerns about a child/young person/vulnerable adult
- Form for reporting concerns about a member of staff
- Risk assessment for outing/trip with children, young people and vulnerable adults
- Sign in / sign out sheets pro forma
- University risk assessment form

Date Written	<b>9 May 2017</b>
Author	Sue Whitham and Lorna Goodwin
Version number	v.2
Person responsible	Jo Blunden
Effective from	1 July 2017
Review date	June 2022
Impact Assessment date	May 2017
History (where discussed / who circulated to / committees considered)	Directors Forum May 2017. Board of Governors June 2017.