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Greenwich Students' Union: Safeguarding Statement

- If in doubt, share your concern!
- Problems can worsen if you keep quiet, and keeping quiet adds to your own distress.
- You are not wasting anyone's time by reporting genuine concerns: it's better to discount the possibility that there is abuse, harm or neglect, than to wait and allow harm to worsen.
- Your concern may seem small in itself, but it could be one small piece of a jigsaw that enables others to build up a complete picture and to prevent harm.

All staff, volunteers and trustees are responsible for ensuring that children, young people and adults at risk who use our services are safeguarded, and for reporting on concerns under this policy.

Where staff or volunteers have reason to be concerned that a child or adult is at risk of harm, for any reason, those concerns must be reported at the earliest opportunity to their relevant supervisor or line manager.

The supervisor or line manager will inform the Senior Adviser, who is the Designated Safeguarding Officer (DSO) for children and vulnerable adults.

Contact: Jason King
Phone: 0208 331 8267
Email: jason.king@gre.ac.uk

If the Senior Adviser is not available, the Deputy DSOs are:

Contact: Lisa Connellan
Role: Head of Commercial
Phone: 0208 331 9256
Email: l.conellan@gre.ac.uk

Contact: Heather Doon
Role: Representation & Advice Manager
Phone: 0208 331 9259
Email: h.doon@gre.ac.uk

Allegations against trustees, staff or volunteers shall be reported to the Chief Executive

Contact: John Schless
Phone: 0208 331 8953
Email: j.schless@gre.ac.uk

Concerns about external speakers attending SU or student group events shall be reported to the Student Activities Manager, who is responsible for ensuring that the SU complies with its internal procedure and the University Code of Conduct.

Contact: Onyinye Nkemderim
Phone: 0208 331 8463
Email: O.D.NKemdirm@gre.ac.uk

Allegations against the Chief Executive shall be reported to the Chair of the Board of Trustees.

Contact: Liz Jones
Phone: 0204715437
Email: liz.vanjones@gmail.com

A list of current postholders is found at Appendix 1: staff contact information will be included on printed posters and online statements

1. Introduction

- 1.1 Students using SU services should feel safe and be able to trust us. All workers including volunteers must be aware of their responsibilities to safeguard children and vulnerable adults using our services, and to report on causes for concern about children or vulnerable adults if we are aware of wider concerns.
- 1.2 Although we do not provide regulated services, we often work with adults who may be vulnerable. It is very rare, but possible, that we could work with young students aged 16-18, who are legally classed as children (in this policy, we have referred to children aged 16-18 as 'young people'). It is also possible that we may become aware of risks to others as a result of information passed to us by students, staff and trustees.
- 1.3 The SU is committed to ensure that
 - (1) our clients and third parties are protected from potential harm whilst using our services, and
 - (2) To take steps to ensure that if we aware of vulnerable adults or children who are at risk, that we pass on information to enable statutory services to fulfil their safeguarding responsibilities.
- 1.4 This policy outlines our policy and procedures to identify and respond to concerns regarding safeguarding. It urges all staff, volunteers and trustees ('staff' for short) to be alert and vigilant about such concerns, and provides guidance on how to respond to these concerns.
- 1.5 The SU recognises that all children, young people and adults at risk must be safeguarded and protected from harm; and that they have a right to be listened to and heard. Their views, however communicated, should always be respected and taken seriously.
- 1.6 The SU will take all allegations of abuse against a child or vulnerable adult seriously. Adherence to this policy protects children and vulnerable adults, and also SU staff and the reputation of the service.
- 1.7 In putting this policy into practice, the SU shall have regard to guidance, policies and procedures detailed in **Appendix 2 (Further Information)**, and comply with Greenwich Safeguarding Children's Board and Greenwich Safeguarding Adults Board requirements.
- 1.8 Sections (3) to (5) detailing Safeguarding Children and Young People, Adults at Risk and Extremism, list
 - (a) Actions and responsibilities actions to take (highlighted in text boxes for all staff)
 - (b) Important definitions, for example 'abuse'

(c) Key considerations for the Students' Union to take into account.

1.9 If in doubt, if there is any reason to be concerned about a child, young person, or adult at risk, this policy requires staff to report on those concerns, to enable the Designated Safeguarding Officer to act.

2. General Principles

2.1 Students capable of making informed decisions should be allowed to make their own decisions about their lives, which may involve a degree of risk. However, this does not absolve the SU from its responsibility to safeguard young people and adults at risk.

2.2 Where the person in question does not have the mental capacity to make an informed choice, the SU will need to consider what is in the best interests of the person at risk, informed where appropriate by discussion with relatives, carers or others in regular contact with the person. Any action to be taken by the SU will respect the right of service users to privacy, and will involve the least number of people necessary to safeguard the person at risk, with the minimum interference necessary. Action will be proportionate to the assessed level of risk. These decisions will be made by the Designated Safeguarding Officer, in consultation with local Safeguarding Services (see **Reporting Concerns, section 6**).

2.3 Judgments relating to protecting children and vulnerable adults will err in favour of taking action to protect people from possible risks, and to protect the reputation of the SU from perceptions that may deter someone in need from using our service.

2.4 All staff and volunteers, including trustees, will adhere to the policy and guidelines. Failure to do so will have consequences for the reputation and service delivery of the SU, and may lead to disciplinary action.

3. Safeguarding Children And Young People

3.a Action to take if staff have a reason to be concerned about a child or young person:

All staff and volunteers are responsible for ensuring that children and young people using our services are safeguarded, and that causes for concern about children and young people are passed on to the Designated Safeguarding Officer (DSO) or deputy.

Staff will follow the procedure for Reporting Concerns (section 6) to enable the DSO or deputy to act, and to involve relevant Safeguarding services when appropriate, in general:

1. The Police (999) If a child or young person is in immediate danger.
2. University Safeguarding officers, if the student is at risk or another student under 18 is at risk;
3. **Royal Borough of Greenwich Safeguarding Children Team**
(020 8921 3172 (office hours for referrals), 020 8921 2267 (consultation line for workers), 020 8854 8888 (out of hours social worker)
Secure email for referrals: initial.response@royalgreenwich.gov.uk
Allegations against staff or volunteers: phone 020 8921 3930 for Quality Improvement Leaders.
4. If the child or young person at risk does not live in the Borough of Greenwich, relevant Childrens Services in the Local Authority area where the child lives.

If there is doubt about whether or not to share information, or to breach confidentiality, the DSO or deputies will contact the NSPCC helpline on 0808 800 5000, for experts to advise on the most appropriate course of action.

3.b Key definitions:

3.b.1 Safeguarding

For the purposes of this policy we have adopted the definition used in 'Working Together' which defines safeguarding and promoting children and young people's welfare as:

- Protection from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Take action to enable all children to have the best outcomes.

3.b.2 Children and Young People:

A child in law is anyone who is under the age of 18.

In this policy, **young people** refers specifically to children aged 16 to 18.

3.b.3 Child Abuse is defined in the London Child Protection Procedures. Professionals must refer to these Procedures.

Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Children may be abused in a family or institutional or community setting; by those known to them, or, more rarely, by strangers. They may be abused by an adult or adults, or another child or children.

3.b.4 Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of that child's health or development. Neglect may include (but is not limited to)

- substance abuse during pregnancy;
- failure to provide adequate food and clothing or shelter;
- failing to protect from physical or emotional harm or danger;
- failure to ensure adequate supervision or to ensure adequate access to medical care or treatment.
- It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

3.b.5 Emotional abuse is the persistent emotional ill treatment such as to cause severe and persistent adverse effects on the child's emotional development. It may convey to a child that s/he is worthless, unloved, inadequate or valued only insofar as the child meets the needs of another person. It may feature age or developmentally inappropriate expectations of children. It may involve witnessing or hearing the ill-treatment of another. It may involve more serious bullying causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of ill treatment of children, though it may occur alone.

3.b.6 Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates symptoms of, or deliberately induces illness in a child. Female genital mutilation is a form of physical abuse.

3.b.7 Sexual abuse involves forcing or enticing a minor to take part in sexual activities, whether or not the minor is aware of what is happening. This may involve physical contact whether penetrative or non-penetrative. Sexual abuse may also include non-contact activities such as involving minors in looking at or producing pornographic material, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

3.c Issues for Greenwich Students' Union:

3.c.1 Information given to SU staff may indicate a young student, a family member or another child or children are at risk of abuse, neglect or other harm, or have been harmed in the past.

3.c.2 A small number of students may be under 18 when they arrive at University and engage with SU services. More commonly, we will engage with students at all levels who have parental responsibility, are pregnant or who are themselves engaging with children within their families, neighbourhoods, or possibly through voluntary work connected with the University or the Students; Union. In some cases, Social Services may have ongoing legal responsibilities for students beyond the age of 18. For other students, childhood experiences of abuse or neglect may have an ongoing impact in their lives into adulthood.

If in doubt, staff should consult the DSO for guidance in supporting young students, or to support students who have disclosed past abuse or neglect.

3.c.3 We will respond to specific concerns about children and young people at risk of significant harm, and will refer concerns to Children's Services or Police to ensure that children and young people are kept safe. Such concerns may include:

- Sexual abuse
- Physical abuse
- Emotional abuse
- Neglect

We recognise that children and young people may face other risks and challenges such as:

- Exposure to domestic violence at home, even if they are not the direct victim
- Child trafficking
- Sexual exploitation
- Female Genital Mutilation
- Forced Marriage
- Chastisement
- Radicalisation
- Gang culture
- Private fostering

All workers must be alert to these risks and challenges and treat them seriously by ensuring that concerns are reported to line managers and on the DSO in order to both to protect the person we know about, and to safeguard others who may be at risk.

3.c.4 Children and young people may be vulnerable due to one or more of the above risks. They may also have existing needs. Staff must be alert to the potential need for help and support. For example, if they:

- Are disabled and have specific additional needs

- Have special educational needs
- Are young carers, looking after an adult or sibling
- Are showing signs of engaging in antisocial or criminal behaviour
- Live in challenging family situations, for example parental substance misuse, parental mental health problems or domestic violence
- Have returned home to their family from care, or are living on their own following time in care.
- Are showing early signs of abuse or neglect
- Are being privately fostered

These issues may also be relevant in considering whether students who have recently left home or care may be vulnerable as adults.

- 3.c.5 Concerns shall be passed on promptly, as per **section 6 (Reporting Concerns)**. Lead responsibility for safeguarding children and young people lies with the DSO.
- 3.c.6 The SU does not assume that it is appropriate to inform family members or others without the young person's consent if the young person is competent to make informed decisions. However, data protection exceptions and the SU policy for the Advice Service on breaching confidentiality allow information to be shared when it is necessary to prevent harm.
- 3.c.7 We will endeavour to support young people, and adults who have experienced abuse or neglect as young people, to disclose information voluntarily, without taking that decision away from them, unless there is no practical alternative to protect them or others at risk.
- 3.c.8 The **Advice Service** procedure on Working with Vulnerable Clients, its general Client Care procedure and Code of Conduct for Advice Staff detail how advisers will work generally with young people. We will welcome and encourage the involvement of key workers, with the young person's consent, at client interviews.
- 3.c.9 Intimate relationships between SU staff and young people are forbidden. Sexual relationships between SU staff and young people will be considered gross misconduct, and could lead to civil and criminal proceedings. Grooming of young people, and other age-inappropriate conduct (whether face-to-face or via information and communications technology) will be treated similarly.
- 3.c.10 **Allegations against staff** in relation to child protection, either while carrying out their work or in relation to their private lives, must be dealt with in accordance with the current London Child Protection Procedures, full details of which are available at www.londonscb.gov.uk. Where a criminal offence is alleged to have taken place, the police must be informed.
- 3.c.11 The SU is accountable to the Greenwich Local Safeguarding Children Board.

4. Safeguarding Adults at Risk:

4.a Action to take when staff have concerns about an adult at risk:

All staff, volunteers and trustees ('staff') have the responsibility to report on concerns about any allegations or suspicions of abuse or potential abuse of an adult at risk to the Designated Safeguarding Officer (DSO) or deputies.

Staff will follow the procedure for Reporting Concerns (section 5) to enable the DSO or deputy to act, and to involve relevant Safeguarding services when appropriate, in general:

1. To call 999 if an adult at risk is in immediate danger;
2. University Safeguarding officers, if the adult at risk is a student;
3. Royal Borough of Greenwich Contact Assessment Team (020 8921 2304 (office hours), 020 8854 8888 (emergency duty team), email aops.contact.officers@royalgreenwich.gov.uk)
4. If the adult at risk does not live in the Borough of Greenwich, the relevant Adult Care Services (Social Services) in the Local Authority area where the adult at risk lives.

4.b Key Definitions:

4.b.1 A 'vulnerable adult' or an 'adult at risk' is a person aged 18 or over who:

- Is in need of care and support; and
- Is experiencing, or is at risk of, abuse or neglect; and
- As a result of their need for care and support, is unable to protect themselves from experiencing or risking abuse or neglect.

In this policy, we have referred to vulnerable adults as 'adults at risk'.

Someone may need care and support, for example, due to:

- physical ill-health, disability or cognitive impairment;
- Learning disability;
- Mental ill-health, including dementia or a personality disorder;
- long-term illness / condition
- Alcohol / substance misuse
- Responding to traumatic or difficult life events
- Or for other reasons, the person may be unable to demonstrate their capacity to make a decision when at risk.

4.b.2 **Safeguarding** is defined as 'protecting an adult's right to live in safety, free from abuse and neglect'. The range of abuse experienced by children – emotional, physical and sexual – and neglect applies also to adults, though the context may differ.

4.b.3 **Abuse** is defined in 'No Secrets' as '...the violation of an individual's human and civil rights by any other person or persons.'

Abuse is any action that harms another person, and includes:

- Physical abuse
- Domestic violence
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery, including human trafficking, forced labour and domestic servitude
- Discriminatory abuse
- Organisational abuse, including neglect and poor practice
- Neglect and acts of omission
- Self neglect

Abuse may occur in any relationship and may result in significant harm to, or the exploitation of, the person subjected to it.

- It may be a single incident or repeated. It is more likely to be part of a systematic pattern.
- It may be emotional, physical, sexual or psychological.
- It may occur when an adult is persuaded to enter into a financial transaction or sexual act to which they have not, or cannot, consent.
- It may be an abuse of power and may constitute a criminal act.
- It may occur because of a failure to act or to undertake appropriate care tasks.
- It can take place in a variety of settings, including the family home or the person's own home.
- It can take place in both personal and professional relationships.
- It may be carried out by other services users, or people who deliberately form a relationship in order to cause harm.

4.c Issues for Greenwich Students' Union:

4.c.1 As with children, the interests and safety of an adult at risk are paramount. All adults have the right to live their life free from violence, fear and abuse, and have the right to be protected from harm and exploitation. Any action taken will respect the right of the vulnerable adult to privacy and will involve the least number of people necessary to secure the vulnerable adult's protection.

4.c.2 We are likely to come across adults at risk as service users, although we are not providing regulated services. We could work with students who come to University with pre-existing vulnerabilities, as well as students whose vulnerability emerges during their time here, not least because many students aged 18-24 will be living independently for the first time in their life and away from their family and other support networks. We may also work with students at a point of crisis due to life events, such as illness, relationship or family breakdown,

homelessness or poverty, which may make an otherwise-capable student vulnerable to harm, neglect or abuse.

4.c.3 Our own staff and volunteers may be adults at risk. As with safeguarding children and young people, students may be in contact with others who are at risk. Passing on this information to statutory authorities may be crucial to ensuring their welfare is protected.

4.c.4 We are most likely to engage with adults at risk through the Advice Service.

Advice Service clients are made aware of the possibility that the Advice Service may need to break confidentiality through its Service Standards, published on <https://www.greenwichsu.co.uk/advice/studentsafeguarding/>, and at initial meetings with advisers. The decision to pass on information, whether or not there is strictly a breach of confidentiality, is a management decision and not to be made individually.

4.c.5 We recognise that vulnerability, and capacity, may fluctuate. Adults at risk, capable of making informed decisions, having been made aware of the options and consequences of the available options, should be allowed to make their own decisions about their lives. These choices may involve a degree of risk, however this choice does not absolve the SU from its responsibility as an organisation.

4.c.6 Staff must act in accordance with the wishes of the adult at risk wherever possible. Circumstances where these wishes may need to be overridden would include where:

- A serious crime is alleged to have been committed
- There is an active police investigation
- There is significant risk of suicide or self-harm putting an adult at risk of significant harm
- There is significant risk of harm to a third party
- The alleged perpetrator is a member of staff or volunteer
- The adult at risk lacks capacity to consent to an investigation (most commonly, temporary incapacity due to intoxication or a mental health crisis).

4.c.7 In situations when an adult is at risk and unable to make informed decisions (often temporarily rather than permanently), or when an adult at risk, but with capacity, is failing to take steps to safeguard themselves and is at risk, the SU shall take action necessary to safeguard an adult at risk, including breaking confidentiality if there is no other reasonably-practicable way to safeguard them.

4.c.8 Judgments on whether or not an adult at risk has capacity to make informed decisions, and the proportionality of any response to safeguard adults at risk, will be made by the DSO or deputies in accordance with the Mental Capacity Act 2005, but recognising that in emergencies with limited opportunity to make a full

assessment, we will err on the side of taking action to protect an adult from risk from harm until a more informed assessment is made. If in doubt, we will contact Royal Greenwich Contact Team for guidance.

- 4.c.9 The **Code of Conduct** for the Advice Service expressly forbids relationships between advice staff and clients: such relationships will be considered gross misconduct.

Relationships between permanent staff and students generally are strongly discouraged. Relationships between any staff and students may lead to disciplinary proceedings if there are concerns that vulnerable students are at risk or have suffered harm, or if the reputation of the SU is jeopardised because of a relationship with a vulnerable student.

- 4.c.10 **Allegations against staff and trustees** will be dealt with under the **Reporting procedure (section 6)**. Internal disciplinary procedures should be managed separately to any adult abuse investigation carried out by statutory services. Where a criminal offence has been alleged to have taken place by staff or trustees, the police must be informed.

5. Safeguarding from Extremism

5.a Actions and Responsibilities:

Trustees must report to the Charity Commission under its 'Reporting Serious Risks' regime if the SU or any individual staff, trustees or volunteers have any known or alleged link to proscribed organisations or to terrorist or other unlawful activity as soon as the SU becomes aware of it.

The SU, as well as its members and member Clubs and Societies, are bound by our Equal Opportunities Policy and our No Platform Policy, which particularly challenges discriminatory or fascist views or actions. Espousing support for terrorism or extremism is likely to be in breach of these Policies, and may lead to disciplinary proceedings.

The SU adheres to the University Code of Practice for Booking and Conduct of Events Held on University Premises.

Concerns about external speakers attending SU or student group events shall be reported to the Student Activities Manager, who is responsible for ensuring that the SU complies with its internal procedures and the University Code of Conduct.

For the purposes of the University Code, the Student Activities Manager and the Chief Executive are the Approving Officers for SU events and activities (see Appendix 1 for contact information)

Concerns about individuals, activities or groups at risk of abuse from extremist individuals or groups shall be reported to the Student Activities Manager, who will inform the SU Designated Safeguarding Officer and the University. Allegations and action taken will be reported to the Chief Executive, to report to Trustees.

Further information and support is available from:

- Royal Borough of Greenwich Community Safety Team
(community-safety@royalgreenwich.gov.uk)
- Metropolitan Police Anti-Terror Helpline (0800 789 321)

5.b Definitions:

5.b.1 Extremism has been defined by the UK Government as “*the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.*”

5.b.2 A proscribed organisation is an organisation which the Home Secretary believes to be concerned in terrorism, as defined by the Terrorism Act 2000. It is a criminal offence for a person to be a member of, or invite support for, or arrange a meeting for, a proscribed organisation. The Home Office maintains a list of

groups defined as terrorist and other banned organisations on its website. The current list is available at:

<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

5.b.3 Designated persons or entities are individuals or groups facing financial restrictions in the UK. HM Treasury maintains the Consolidated List of designated bodies on its website. The current list is available at:

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>

5.b.4 Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

5.c Issues for Greenwich Students' Union:

5.c.1 As an independent charity, and not a Higher Education Institution, the SU does not carry the wider legal responsibilities that the University of Greenwich does, however as we are based on University premises, we adhere to the University Code of Practice for Booking and Conduct of Events held on University Premises (http://www.gre.ac.uk/_data/assets/pdf_file/0011/1098461/Events-booking-CoP-and-procedures.pdf). We also owe a duty of care to our members and legal responsibilities to the Charity Commission as a registered charity to mitigate against risk.

5.c.2 Universities are expected to be places of learning and debate that foster open discussion of ideas. Younger students in particular may be questioning narratives that they have grown up with, and may be attracted to apparently radical options. We will not take action that appears to criminalise students or others for expressing opinions, but we also recognise that a high percentage of our student population is aged under 25, often away from home or support networks for the first time in their lives, and that they may be more vulnerable to manipulation or abuse in any form, including from extremists and extremist organisations.

5.c.3 In general, our approach with a student at risk of radicalisation is to treat them as an adult at risk, but we will also bear in mind risks posed to other students in considering appropriate responses. We will consider involving the Chaplaincy Team as well as tutors and staff at the University responsible for safeguarding, alongside any action we may need to take to safeguard the student at risk and the wider community.

5.c.4 We have established procedures for Clubs and Societies to manage events involving external speakers, which ensure that the SU takes appropriate steps to mitigate against risk. The procedure and guidance are published online at: <https://www.greenwichsu.co.uk/activities/handbook/events/speakers/>. Non-

compliance with this procedure, as with the Equal Opportunities Policy, will lead to disciplinary action against Clubs and Societies and be reported to the University.

- 5.c.5 'Designated persons' cannot be appointed as SU trustees. If a trustee is subsequently designated, they must resign as a trustee, or they will be in breach of charity law.
- 5.c.6 Staff and trustees must not engage in conduct or activities which would lead a reasonable member of the public to conclude that the SU is associated with a proscribed organisation or with terrorism or extremism generally.
- 5.c.7 The SU will dissociate itself from activities in which an SU representative has given or has appeared to give support to terrorist or extremist activity, and if appropriate, report to relevant authorities.
- 5.c.8 SU staff, trustees and members who give or appear to give support to terrorism or extremist activity may be subject to disciplinary procedures, which will be reported to the Trustees.

6. Reporting Concerns

6.1 Concerns about individuals:

- 6.1.1 Staff or volunteers concerned that a student or staff member, a visitor or a third party is at risk of harm, must raise their concerns with their immediate line manager or event organiser at the earliest opportunity. In an emergency, this will be verbal but should be backed up in writing. Generally, an email will be sufficient.

Information to include when reporting concerns – who, what, when, and what next:

- Name and contact information for the person making the report
- Name and contact information for the person at risk
- Name and contact information for witnesses (if willing to pass this on).
- Reason for the concern.
- If a person at risk has volunteered information, the person recording the information initially should write down what they have been told, as closely as possible using the words actually spoken by the person at risk, without adding personal judgments.
- Times, locations, what happened, and who was involved – if the information is volunteered. The more information, the easier for the Designated Safeguarding Officer or other external services to take the next steps, but it is better not to delay reporting on concerns than to wait for the full picture. External services have the expertise to obtain the full picture, if they decide there is a risk to investigate.
- If the person at risk is consenting to involving the Advice Service or other services (if known).

Suggested content for reporting causes for concern is repeated in **Appendix 3**.

- 6.1.2 Staff are advised not to delay reporting concerns, but simply to pass on what information is volunteered or known to their line manager without deeper investigation. The line manager (or delegated staff member) will report the concerns on to the Designated Safeguarding Officer (DSO) or deputy, to agree further action to safeguard the person at risk.
- 6.1.3 Staff may have identified that a person is at risk because of their behaviour. In some cases, vulnerable students may be themselves subject to disciplinary or other actions as a result of their behaviour. However the SU has identified that a student may be vulnerable, the SU will inform the DSO and consult the DSO on action that may be taken (or may already have been taken) against a young

student or an adult at risk. This should not be taken as meaning that the SU will not take disciplinary action or other action when appropriate simply because a staff member or service user is considered to be vulnerable.

- 6.1.4 Following an initial discussion, the DSO will email the reporting line manager to confirm in writing action to be taken, noting further action agreed, responsibilities and deadlines. Responses may include:
- a. Deciding that there's no cause for concern (noting reasons)
 - b. Monitoring but no other action yet
 - c. Agreeing further action within the SU
 - d. Referring the student to University or external services with their consent.
 - e. Informing safeguarding services or other relevant external services if there is a risk of significant harm to a student or third party, without consent if there is no other practical way to ensure the safety of students or third parties. Any decision on breaking confidentiality would be agreed first with the DSO or deputies, and reported to the Chief Executive.

Actions will depend on the likelihood of the risk happening, and the likely severity of harm that may be suffered. This will need to be decided on an individual basis by the DSO, in consultation with the reporting line manager and external safeguarding expertise if appropriate. The greater the risk and the greater the severity of harm if the risk occurs, the more likely the DSO will decide to pass on information, with or without consent.

- 6.1.5 The DSO will report causes for concern and responses to the Chief Executive, without personally-identifying the person at risk, noting the case number to enable follow-up and scrutiny of decisions, but without passing on personal information unless it is necessary to safeguard individuals.
- 6.1.5 Concerns or risks that are part of the Advice Service's standard work shall not be reported further without the person at risk's consent if the person at risk is a student and co-operating with the Advice Service to mitigate against the risk. Others will be referred with their consent to relevant services, or if it is not possible to obtain consent or the person at risk is unable to consent, the DSO will inform relevant safeguarding authorities. If we need to report on to safeguarding authorities, and/or to breach confidentiality, the DSO will report this to the Chief Executive to report on to the Trustees.
- 6.1.6 In an emergency, if the DSO or deputy is not available (especially outside of normal office hours) and there are concerns that an adult or child is at immediate risk, the line manager will contact emergency services (999) to prevent harm, and report as soon as possible after the event to the DSO to enable necessary follow-on support.
- 6.1.7 In the event of students or others ('student' for short) experiencing emotional distress or suicidal thoughts after normal working hours (particularly within SU

run bars and premises) staff will ask if the person in distress is willing to speak to the Samaritans, and offer the use of office space and an SU phone line to make the call if available. Staff will follow SU procedures, and would be expected to remain with the student until either the distress becomes manageable or emergency services can respond. Any such incident will be reported on to the DSO to consider further action and follow-up: emotional distress is likely to be linked to other issues.

6.1.8 The DSO will generally be responsible for necessary follow-up and ensuring that other relevant services (within the SU, the University and externally are informed).

6.1.9 Allegations against members of staff, volunteers or trustees, including suspicions of abuse, neglect or harm, or participation / support for terrorism or extremism, will be raised with the Chief Executive. Allegations against the Chief Executive will be raised with the Chair of the Board of Trustees. The SU will report on formal investigations to the University.

6.2 Issues concerning events including external speakers:

6.2.1 Questions or concerns about SU events, or events run by members or Clubs and Societies, should be raised with the Student Activities Manager, who will consider appropriate responses, and inform the DSO or deputy and University staff (see **section 5**).

6.3 Annual review:

6.3.1 The DSO will prepare an annual report reviewing practice in dealing with causes for concern, and implications for changes in the procedure or for training needs, in consultation with the Student Activities Manager and the Chief Executive. The report will be forwarded to the Staff Consultative Group, Unison and Trustees.

7. Sharing Information

- If in doubt, share your concern!
- Problems can worsen if you keep quiet, and keeping quiet adds to your own distress.
- You are not wasting anyone's time by reporting genuine concerns: it's better to discount the possibility that there is abuse, harm or neglect, than to wait and allow harm to worsen.
- Your concern may seem small in itself, but it could be one small piece of a jigsaw that enables others to build up a complete picture and to prevent harm.

7.1 Although the Data Protection Act does generally limit the uses of personal data to that which has been agreed with the data subject, it is permissible to share information when necessary to safeguard a person at risk.

7.2 **Any information sharing should ideally be with the data subject's consent.** It may only be passed on without consent if (1) our Policies allow it, and (2) it is legally-permissible.

7.3 Information passed on should be accurate to the best of our knowledge, passed on promptly, and only to those who need to know it to safeguard the person at risk's best interests.

7.4 The **Safeguarding Statement** found online at (<https://www.greenwichsu.co.uk/advice/studentsafeguarding/>), and in poster format in Advice offices) make it clear that the Advice Service may pass on information if:

- 1) we are obliged to share information subject to a Warrant
- 2) it is necessary to comply with our legal duties under Prevention of Terrorism legislation
- 3) we are concerned that there is a significant risk to your safety, or to the safety of other staff, students or other people unless we break confidentiality
- 4) you are incapable of giving consent to share information (for example, due to intoxication or to mental ill-health) and it is necessary to break confidentiality to protect your welfare.'

7.5 Information received that indicates a student is vulnerable and at risk, or poses a risk to others, shall be passed on to the DSO by relevant teams. This includes students subject to any disciplinary proceedings from the University generally, from Accommodation, or from the SU. The DSO will agree with the line manager forwarding the information who else needs to be informed within the SU, the University or external organisations, to ensure that involved in assisting the student at risk have the full picture and can consider their own responsibilities.

- 7.6 If it is agreed that a student is both vulnerable and at significant risk if information is not shared, the SU will err on the side of sharing information. If there is disagreement on sharing information, the issue shall be reported following the DSO to either of the deputy DSOs, and then if there is still disagreement to the Chief Executive.

8. Key Responsibilities for Staff, Trustees and Volunteers

- 8.1 **All staff, trustees and volunteers** are responsible for passing on information when they have a cause for concern about an adult at risk or a child in order to safeguard that person.
- 8.2 **Line Managers** are responsible for ensuring that staff know how to identify causes for concern and are confident to report those concerns on. Line Managers will liaise with the DSO or deputies to respond to causes for concern. Line managers are also responsible for considering the potential for abuse, neglect or harm by staff and volunteers they are responsible for, and agreeing appropriate DBS requirements.
- 8.3 **Staff and volunteers** engaged in unsupervised 1-2-1 contact with people who may be children or vulnerable adults will be expected to have a DBS check, as appropriate for their role, at the start of their paid or voluntary commitments, to declare subsequent convictions or cautions, and to repeat the DBS check every 3 years, when their role or responsibility within the SU changes, or as subject to ongoing licensing requirements.
- 8.4 **Trustees** are particularly responsible for ensuring that the SU Safeguarding Policy complies with Charity Commission requirements, including reporting of safeguarding issues, and that the policy and practice is effective, taking into account reports from staff. The **Chair** is responsible for investigating allegations against the Chief Executive.
- 8.5 The **Chief Executive** is responsible for ensuring that the Safeguarding Policy is implemented, and has responsibility for dealing with allegations against SU staff.
- 8.6 The **Senior Adviser** is the main point of contact within the SU both to respond to causes for concern and to support information and training given to staff and volunteers, and is the **Designated Safeguarding Officer**. In the absence of the DSO, the **Head of Commercial, Head of Membership, or Representation & Advice Manager** shall deputise. The DSO will make the initial decision on breaking confidentiality, or sharing information with other services to safeguard a child or vulnerable adult. If in doubt, this may ultimately be a decision for the **Chief Executive**. Decisions on breaking confidentiality and on responding to causes for concern shall be reported to the Chief Executive.
- 8.7 The **Student Activities Manager** is responsible for ensuring that events involving speakers are planned in accordance with the events booking procedure, which ensures the SU and member Clubs and Societies mitigate against the risk of appearing to support terrorism or extremism. The Student Activities Manager and Chief Executive are **Approving Officers** under the University Code of Practice for Booking and Conduct of Events held on University Premises, and report to the University.

- 8.8 **Advice staff** are forbidden from personal relationships with clients. Student volunteer advisers may have pre-existing friendships and relationships with other students, which we address through our **Conflicts of Interest Policy**. Forming relationships with current clients will be considered gross misconduct. Relationships with former clients are discouraged, and may lead to disciplinary action if there are concerns that vulnerable students are at risk or have suffered harm, or if the reputation of the SU is jeopardised because of a relationship with a vulnerable student.
- 8.9 The following guidance particularly relates to when staff, volunteers or trustees ('staff' for short) are at work or on SU-related business. Line managers working with staff who may themselves be students may have different expectations, particularly for student staff when not on duty. However, line managers should justify and record exceptions to the rule rather than ignore the guidance. Following this guidance should minimise the risk that staff could be accused of acting inappropriately with vulnerable adults or children.

In general, when carrying out SU-related activities:

- a. SU staff should not visit a young person or adult at risk in their home unless on an official pre-arranged visit and usually with a third person present (to be recorded and agreed in advance).
- b. Transport a child or adult at risk alone in their car except by prior arrangement with their line manager or in the case of a medical emergency.
- c. Make any comments with sexual overtones, even in humour, or partake in any 'horse play' with a child or vulnerable adult.
- d. Allow a child or adult at risk into their home.
- e. Engage in rough physical games, apart from structured sports activities which may be part of a community or public event.
- f. Allow or engage in inappropriate touching of any form.
- g. Engage in sexually provocative games
- h. Allow a child or adult at risk to use inappropriate language unchallenged.
- i. Make sexually suggestive comments about or to a child or adult at risk, even in fun.
- j. Let allegations made by a child or adult at risk go unchallenged or unrecorded.
- k. Do things of a personal nature for a child or adult at risk that they can do for themselves.
- l. Lend money to, or borrow money or possessions from, a child or adult at risk.

- m. Agree to make purchases or undertake financial transactions on behalf of a client.
- n. Take photographs of a child or young person without parental consent

9. Safeguarding for Recruitment, Induction and Training

9.1 Recruitment:

9.1.1 It is essential that references are taken up prior to appointment.

9.1.2 Recruitment forms for paid and voluntary roles will ask candidates to declare if they have convictions or cautions, to specify the offences, sentence or outcome, and the date of the conviction or caution.

9.1.3 **Unrelated convictions or cautions shall not be a barrier to paid or voluntary work with the SU.** However, false declarations will be considered grounds to terminate applications.

- (a) If the applicant has proceeded to paid work, false declarations will be considered to amount to gross misconduct leading to immediate suspension pending investigation.
- (b) Voluntary commitments will be cancelled with immediate effect. Line managers may consider with further investigation, and in consultation with the DSO or others as appropriate, whether the voluntary commitment may be reinstated, or alternative voluntary work offered, however dishonesty may also be a factor against offering alternative voluntary work.

9.2. DBS Checks:

9.2.1 Paid staff, sabbaticals, volunteers and trustees whose work involves:

(1) Unsupervised 1-2-1 contact with people who may include children or adults at risk or

(2) Leadership, supervision or financial management

Are expected

- to have a DBS check, as appropriate for their role, at the start of their paid or voluntary commitments;
- to declare subsequent convictions or cautions;
- And to repeat the DBS check every 3 years, when their role or responsibility within the SU changes, or as subject to ongoing licensing requirements.

9.2.2 All staff, volunteers, and trustees are expected to declare if they have any unspent cautions or convictions during their recruitment and at yearly intervals thereafter. False declarations shall be considered gross misconduct.

9.2.3 The SU shall be responsible for asking staff for basic DBS checks, and for requesting standard or enhanced checks as appropriate. The SU shall reimburse costs for staff needing to request their own DBS check, and meet the costs of applications for standard or enhanced checks. Eligible volunteers may be able to request a free check, if they receive no payment for their services. Guidance on DBS checks for volunteers is available online at:

<https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers#volunteer-applications>

9.2.4 Staff are responsible for notifying line managers of changes in circumstances, in particular cautions or convictions. Staff are also responsible for notifying line managers if they are the subject of an external safeguarding investigation, for line managers to consider whether it is appropriate for staff to continue in their present duties until the outcome of such investigations. Failure to notify line managers of such investigations shall be considered gross misconduct and justify immediate suspension pending further investigation.

9.2.5 Requesting DBS Checks:

Unless needing to apply for over 100 DBS checks per year, the SU will need to apply through approved umbrella organisations.

The University of Greenwich currently uses Atlantic Data to process DBS applications.

A full list of approved organisations is available at <https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers#volunteer-applications>

9.3 Induction & Training:

9.3.1 Understanding and responding to Safeguarding concerns shall be part of staff, volunteer and trustee induction from September 2016.

9.3.2 Line managers responsible for student-facing staff and volunteers, including Club / Society leaders, will work with the DSO to develop team-specific short training relevant for the roles, supplemented with publicly available resources.

10. Planning to Prevent Harm

10.1 The DSO in consultation with SU staff and in particular the Chief Executive will develop an annual plan to implement this policy.

10.2 The action plan will address:

- staff and volunteer information and training needs;
- Monitoring and reporting of causes for concern;
- Information sharing with the University of Greenwich and external services on safeguarding issues;
- Publicity;
- Budget implications.

11. Reviewing Practice

11.1 This policy, and implementation of the annual action plan, will be reviewed annually by the DSO in consultation with staff, and reported to Trustees.

11.2 The policy and practice may be subject to review following critical incidents.

Appendix 1: Contact Information for Staff and Trustees with Safeguarding Responsibility

Role	Name	Phone	Email
Designated Safeguarding Officer	Jason King (Senior Adviser)	020 83318267 (direct line)	Jason.king@greenwich.ac.uk
Deputy Safeguarding Officer	Lisa Connellan (Head of Commercial Services)	020 8331 9256 07813 695 108	l.connellan@gre.ac.uk
Deputy Safeguarding Officer	TBC – Post Vacant	TBC	TBC
Deputy Safeguarding Officer	Heather Doon (Representation & Advice Manager)	020 8331 9259 07507 834 361	h.doon@gre.ac.uk
Approving Officer	Onyinye Nkemdirim (Student Activities Manager)	020 8331 8463 07968 997 643	o.m.nkemdirim@gre.ac.uk
Approving Officer	John Schless (Chief Executive)	020 8331 8593 07813 695 108	j.schless@gre.ac.uk
Chair of Board of Trustees	Liz Jones	N/A	liz.vanjones@gmail.com

Appendix 2: Further Information:

Charity Commission Safeguarding Strategy:

http://forms.charitycommission.gov.uk/media/90446/safeguarding_strategy.pdf

Charity Commission guidance: Protecting Charities from Abuse for Extremist Purposes

<https://www.gov.uk/government/publications/protecting-charities-from-abuse-for-extremist-purposes>

Greenwich Safeguarding Children Board:

<http://www.greenwichsafeguardingchildren.org.uk/site/index.php>

Greenwich Safeguarding Adults Board:

<http://greenwichsafeguardingadults.org.uk/>

London Multi-Agency Adult Safeguarding Policies & Procedures (August 2016)

<http://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures/>

No Secrets: Guidance on Protecting Vulnerable Adults in Care

<https://www.gov.uk/government/publications/no-secrets-guidance-on-protecting-vulnerable-adults-in-care>

NSPCC Helpline: Phone 0808 800 5000

<https://www.nspcc.org.uk/services-and-resources/nspcc-helpline/>

Prevent Duty Guidance for England & Wales (revised 2016)

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Prevent Duty: NUS guidance for Students' Unions (2016)

<http://www.nusconnect.org.uk/resources/nus-guidance-for-students-unions-prevent-duty>

Proscribed organisations – current list available at

<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

Designated persons or entities – current list available at

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>

Safeguarding training (online, free for organisations based in the Borough of Greenwich.

Individuals must register to access training):

https://greenwich.melearning.university/course_centre

SU policies and procedures:

- Activities Events booking
- Advice Client Care Procedure
- Advice Code of Conduct
- Advice Working with Vulnerable Clients
- Bullying & Harassment
- Confidentiality
- Disciplinary Procedures
- Equality Statement
- Health & Safety
- No Platform
- Recruitment Handbook
- Safe Spaces

University of Greenwich policies and procedures:

- Code of Practice for Booking and Conduct of Events held on University Premises
http://www.gre.ac.uk/_data/assets/pdf_file/0011/1098461/Events-booking-CoP-and-procedures.pdf
- Under 18s
- Fitness to Study
- Students Giving Cause for Concern
- Safeguarding Policy 2018
 - <https://docs.gre.ac.uk/rep/sas/university-of-greenwich-safeguarding-policy>

Working Together to Safeguard Children (2015):

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Appendix 3: Reporting Causes for Concern

Information to include when reporting concerns – who, what, when, and what next:

- Name and contact information for the person making the report
- Name and contact information for the person at risk
- Name and contact information for witnesses (if willing to pass this on).
- Reason for the concern.
- If a person at risk has volunteered information, the person recording the information initially should write down what they have been told, as closely as possibly using the words actually spoken by the person at risk, without adding personal judgments.
- Times, locations, what happened, and who was involved – if the information is volunteered. The more information, the easier for the Designated Safeguarding Officer or other external services to take the next steps, but it is better not to delay reporting on concerns than to wait for the full picture. External services have the expertise to obtain the full picture, if they decide there is a risk to investigate.
- If the person at risk is consenting to involving the Advice Service or other services (if known).

The report is best submitted by email to the DSO, who will keep a copy of the report.

The DSO will confirm by email as per Reporting Concerns (section 6) action to be taken, and who is responsible for taking action.