UNIVERSITY SAFEGUARDING PROCEDURE

1. INTRODUCTION

The University is committed to providing a safe environment where individuals can work, learn, socialise and live. The University will take such steps which are reasonable to ensure that children, young people and adults at risk are safe, and that policies and procedures are in place to reduce the risk of harm. This Procedure should be read alongside the University Safeguarding Policy.

2. PURPOSE

Prevention and early action are essential to reducing the risk of harm to children and adults-at-risk. This procedure is for managing concerns and allegations and to ensure staff understand their responsibilities to safeguard children and adults-at-risk.

This procedure outlines the steps staff should take to support students or others they come into contact with whilst undertaking university business (face to face and online) who appear to be at risk of harm, or of being drawn into terrorism or into extremist ideologies. The identification and assessment of a concern is crucial to understanding how to respond to a safeguarding concern. In some cases, the adult/child themselves will disclose that they are at risk, or have experienced abuse, but sometimes a disclosure may relate to someone else, or it may be determined that someone else is at risk.

3. SCOPE

This Policy applies to all University staff, applicants, students, apprentices, contractors, volunteers, visitors and collaborators, and is applicable for all university-led activity on university-managed properties and grounds, off-campus, and online environments. This includes our core activities of teaching and research, as well as university-led events and activities, such as sport, volunteering projects, and outreach activities

4. PROCEDURES

4.1. Emergencies

If you believe an individual is at immediate risk, or there is a threat to the life of any person, action should be taken immediately by calling the Police on '999'. The University's Campus Safety Team can be contacted on **01782 733999** and students and staff can also use the Safezone app to get help quickly from the Campus Safety Team.

4.2. Student Wellbeing Concerns

The University provides a range of support services for students and students can either self-refer or be referred to a specialist wellbeing related service.

When working with students it is important to recognise that there are a number of potential indicators that someone may be at risk (see Annex 1. Definitions). These are not exhaustive lists and there may be other signs or contributing factors which lead to a concern about an individual. It is important to recognise that within the University the majority of students are adults, but there may be signs of wellbeing concerns, such as:

- Not engaging with academic work;
- Encountering academic difficulties;
- Not responding to communications;
- Not paying rent, fees or fines;
- Disciplinary/academic misconduct issues;
- Not engaging with other students or staff/isolating themselves;
- Not being involved in community activities.

It is important to recognise that one or more of these signs could indicate a wellbeing concern, but caution should be exercised when assessing a situation. University staff should always seek advice from Student Services or a Safeguarding Coordinator if they are concerned about an individual.

4.3 Disclosures

Staff should ensure their safeguarding training is up to date to ensure they are able to recognise any signs that an individual may be at risk. If an adult or child makes a safeguarding disclosure the following suggestions may be helpful:

- Listen carefully and respond sensitively;
- Do not ask invasive questions which prevent the person from telling the full story;
- Encourage, give lots of time and don't pressurise;
- Be aware that, for various reasons, disclosing such information can be difficult;
- Stay calm and keep listening, without expressing whatever shock or alarm may personally be felt;
- Make notes which explain in the person's own words what is being said;
- Be honest about needing to tell other people in cases of concern;
- Under no circumstances should you contact or confront the alleged abuser/radicaliser/source of risk, even if they are known to you in any capacity, or are a member of staff or are a student / staff member of the University;
- Keep the details of the conversation and any related notes in accordance with data protection legislation.

When concerns first come to light it is important to listen accurately record any information. If a member of staff has a safeguarding concern, they should complete the Safeguarding Concern Form and send it to Safeguarding.keele@keele.ac.uk. The University's Safeguarding team will work with appropriate external colleagues when required to respond to a safeguarding concern.

Where there is a concern about immediate danger or violence, staff should contact the Emergency Services on 999 and Campus Safety Team, if on campus and able to do so.

4.4 Allegations

A member of the University community may become aware of concerns related to another member of staff or student, or a third party might disclose a concern regarding a member of the University community. If this happens, a Safeguarding Concern Form should be completed and sent to Safeguarding.keele@keele.ac.uk. The HR Safeguarding Lead can be contacted for cases involving

allegations against staff, and the Designated Safeguarding Officer or Safeguarding Strategic Lead can be contacted for cases related to staff, students, or another party. The University is required to work with the appropriate external agencies to respond to a Safeguarding allegation and it is vital that staff do not speak to the alleged perpetrator or others about the alleged offence.

Irrespective of the outcome of any external or multiagency investigations, the University may consider carrying out its own internal investigation in accordance with its own disciplinary procedures related to staff or students:

- [Disciplinary and Appeals Procedure (Staff) - Keele University](#)
- [Disciplinary and Appeals Procedure for Academic Staff - Keele University](#)
- [Regulation B1 - Keele University](#)

A risk assessment will be carried out to ensure any immediate risk mitigation can be put in place as part of this process.

The University is required to report instances of misconduct relating to children and adults at risk under the provisions of the Safeguarding Policy. This report is to the Disclosure and Barring Service (DBS) and any relevant professional associations. This would generally apply when the member of staff has been asked to leave the University or a student's studies have been terminated for reasons of misconduct or unsuitability to work with children or adults at risk. In the case of a staff member, the reporting will be done by the Chief People Officer (or delegate). In the case of students, the reporting will be done by the Director of Student Services (or delegate).

4.5. Disclosure and Barring (DBS) and Staff Recruitment Practices

The University Disclosure and Barring Policy (Staff) sets out the action to be taken by the University to respond to the Disclosure and Barring Service (DBS).

A DBS check is a requirement of PSRB for programmes related to the child and adult workforce, namely programmes involving working/volunteering with both children and or adults at risk.

Other roles within the University will also be subject to the requirement of a DBS check prior to engaging with the University in a work or voluntary basis. The University Policy on the use of DBS checks provides further guidance on which roles will require this additional level of assessment, and at what level. The requirement of a DBS check is based upon the role and consideration is given to any level of check required at the time the position is created, prior to appointment.

Where an existing member of staff moves into a role with regulated activity, a DBS check will be carried out. Where duties of an existing member of staff or role evolve, further advice should be sought from HR.

Safer recruitment practices are utilised to prevent unsuitable people working with vulnerable individuals. This includes the use of DBS checks where necessary, checking of DBS barred lists, obtaining a minimum of two references, previous employment history (including any gaps in employment) and qualifications (academic and any other relevant qualifications). The University Disclosure and Barring Policy (Staff) lists specific roles identified as requiring a DBS check and provides examples of the type of duties which are covered at each level of disclosure. Please note this list is not exhaustive and if a person is unsure, advice should be sought from the HR Team.

Staff with responsibility for recruitment and selection activities should adhere to the University's [Recruitment and Selection Code of Practice](#).

Persons working in a regulated position (according to the guidance provided by the Disclosure and Barring Service), who are not direct employees of the University, will also be required to undergo DBS checks. However, these checks may have to be carried out by the employer of that individual. Where a contractual relationship exists between the University and the organisation, this requirement, where applicable, will be reflected in contracts.

Further advice can be sought from the HR Team.

4.6 Under 18's Admissions

The University can admit students who will reach their 18th birthday within the first year of their studies at The University, if they meet all of the admissions criteria and have received consent from the students' parents/legal guardians. Please refer to the Admissions Under 18 procedure. In some cases, and following a risk assessment process, we may admit students at the age of 16.

Following a risk assessment process, the University may not admit or may decide to defer a student application if the applicant is under the age of 18 at the time of entry to the University.

Applicants may be invited to interview as part of the University's admissions process. It is the Academic School's responsibility to ensure all safeguarding measures are in place, including panel members (both internal and external) having an awareness of safeguarding and how to escalate a concern. Good practice guidance can be found on our safeguarding webpages.

The University recognises that the University-owned accommodation is an adult environment and the University will not admit anyone into University-owned accommodation unless they will reach the age of 18 prior to 1st January in their first academic year at the University. Some students will have different start dates and the same timeframe will be used.

4.7 IT Use

The University has policy, procedures and guidance in place regarding the appropriate use of IT and guidance to support users. This information can be found on the IT webpages and on the Safeguarding webpages. All staff should ensure they are familiar with this policy and guidance.

All users of University IT systems are expected to act in a responsible manner when using these facilities and to abide by the University's IT Acceptable Use Policy and other IT policies. IT Network use and communications may be monitored for the business purposes of the University as permitted by UK legislation. The legislation allows the interception of network traffic without consent for purposes such as:
- Recording evidence of transactions
- Ensuring regulatory compliance
- Detecting crime or unauthorised use

4.8 Confidentiality

The need to share confidential information must be balanced against duties to protect and promote the health and welfare of students, staff and members of the public. The University recognises that students will share sensitive information with us to ensure appropriate support can be provided. In some cases, where there is deemed to be a risk of harm, the University may need to share information with third parties. Examples include Information Sharing with Emergency Contact and those detailed within the University's Privacy Notice for Students.

If a risk of harm is identified for a child or adult is at risk, or where a student is at risk of being drawn into terrorism or ideologies that support terrorism, the University is required to disclose this information to the appropriate external party.

4.9 Getting Support

Coming into contact with children or adults in need of safeguarding can have a personal impact. The University has partnered with Health Assured, an independent, confidential third party company and app, to provide mental health, counselling and crisis support to colleagues. Staff can call the free confidential 24/7 helpline on 0800 0305182 to access their services.

5. ROLES AND RESPONSIBILITIES

Safeguarding is everyone's responsibly and it is important that all staff recognise their role in ensuring a safe and supportive University environment.

Role/Committee	Role-holder	Responsible for
All staff		- Complying with mandatory training requirements - Reading the Safeguarding Policy and associated procedures
University Council	Members of Council	Ultimate responsibility for safeguarding within the University and for compliance with all legal obligations by the University.
University Audit and Risk Committee	Committee members	Responsible to Council for ensuring the University has appropriate risk registers and mitigations in place in relation to University risk.
University Safeguarding Oversight Group	Group Members	- Oversee and monitor the University's approach and compliance with any Safeguarding requirements related to children and vulnerable adults. - Develop and maintain the University's Safeguarding Risk Register, assessing risks and planning mitigations. - Ensure that planned risk mitigations are implemented in good time and the monitoring of effectiveness of the mitigations. - Ensure the completion and publication of the Annual Safeguarding Report, providing the report to Council in a timely manner. - Work collaboratively with Educational Partners and the Students Unions to ensure compliance with any Safeguarding requirements. - Oversee and regularly review relevant University policies and procedures associated with Safeguarding. - Develop and oversee a training framework across the University, ensuring the training is available, suitable and undertaken by all staff as necessary.
University Safeguarding Network	Network Members	- Provide and receive training as appropriate - Share best practice and relevant updates related to safeguarding

		• Contribute to the Safeguarding Oversight Group to support the development and delivery of policy, procedure and risk register • Ensure appropriate Safeguarding provision is in place within their area of work
Safeguarding Strategic Lead (University Executive Committee)	Director of Student Support and Success	• Have overall responsibility for implementation and promotion of the University's Safeguarding Policy. • Chair the University Safeguarding Oversight Group to provide assurances on the University's approach to and compliance with the Safeguarding policy • Ensure that the Safeguarding Policy and guidance is updated regularly and reflects changes to legal requirements and good practice.
Designated Safeguarding Officer	Head of Student Wellbeing	• Act as a point of contact for those who have a Safeguarding concern, receive information and record those concerns. • Provide information, advice and training to appropriate staff in respect of their Safeguarding responsibilities. • Investigate and act upon concerns as appropriate, including seeking advice or making a referral to external partners. • Maintain records of any safeguarding allegations, investigations or referrals and their outcomes. • Oversee the Safeguarding network to share best practices and opportunities for training. • Support the Director of Student Services and Sucess to implement and maintain this procedure and associated procedures, guidance and risk register.
HR Safeguarding Lead	Deputy Director of HR	• Lead contact for staff safeguarding matters • Contributing to the development and implementation of policy, process and risk assessments • Ensures appropriate staff related safeguarding processes are in place, including safer recruitment practices and DBS processes • Support HR Managers and Advisers to work directly with staff connected with safeguarding issues. • Work with the Safeguarding Strategic Lead/Designated Safeguarding Officer to response to any staff related allegations or concerns Support the delivery of training to staff
Safeguarding Coordinators	List provided in the related [procedure](#)	• Ensure their individual training is kept up to date • Assist in the implementation of local Safeguarding Procedures. • Be aware of indicators of abuse and neglect. • Operate as a local contact within a Directorate / Faculty / School for Safeguarding matters.

		• Escalate concerns to Designated Safeguarding Officer.
Local Safeguarding Lead Roles	As required by areas with additional safeguarding responsibilities	• Ensure any additional local safeguarding arrangements are in place to meet specific regulatory requirements that do not apply to the University as a whole. This includes academic areas, as well as others such as (but not limited to) Keele Day Nursery and Global Student Recruitment and Admissions in relation to Access and Outreach work.
Academic Schools	Heads of Schools	• Ensure staff are aware of any safeguarding implications on any teaching or other practices (including placements, field trips, visits and other activities); • Ensure that staff and students are appropriately trained; • Ensure that staff and students comply with any safeguarding requirements required by their Professional Statutory and Regulating Bodies (PSRB); • Ensure that any safeguarding concerns are escalated as appropriate

6. RELATED POLICIES AND PROCEDURES

The following University Policies and Procedures, contained within the Policy Zone, should be read alongside this Procedure and the Safeguarding Policy:

- Admissions Policy, Admissions Interview Policy & Admissions Under 18's Policy
- Appropriate Policy
- Staff Drug and Alcohol Policy
- Personal Relationships at Work Policy
- Bullying and Harassment Policy and Procedure
- Academic Mentor Code of Practice
- Data Classification and Handling Policy
- Data Protection Policy (students)
- Dignity and Respect Policy and Procedure
- Disclosure and Barring Service Policy (staff)
- Speaker and Event Approval Procedure
- Freedom of Expression Code of Practice
- Gender Segregation Joint Code of Practice
- Group Social Events Code of Conduct
- Health and Safety Policy
- Information Sharing with Emergency Contacts
- IT Acceptable Use Policy
- Loan Working Code of Practice
- Religion and Belief Policy
- Sexual Violence and Misconduct Policy and Procedure
- Support to Study Policy

- [Whistleblowing Policy](#)
- [Whistleblowing Procedure](#)
- [Safeguarding in Research and Innovation](#)
- [Disciplinary and Appeals Procedure for Academic Staff](#)
- [Staff Disciplinary and Appeals Procedure (Non-Academic)](#)

7. RELATED EXTERNAL POLICIES AND GUIDANCE

- [Keeping Children Safe in Education](#) (2024)
- [Working Together of Safeguard Children](#) (2023)
- [The Care Act](#) (2014)
- [Office for Students Prevent Duty](#)
- [Prevent Duty Guidance](#) (2023)
- [Disclosure and Barring Service](#)
- [Data Protection Act](#) (2018)
- [Sexual Offences Act 2003](#)
- [Equality Act 2010](#)
- [The Mental Capacity Act (2005)](#)

8. REVIEW, APPROVAL & PUBLICATION

- This Procedure and will be reviewed every two years by the Safeguarding Oversight Group;
- This Procedure will be submitted to the University Executive Committee for approval together with any subsequent reviews;
- The Policy and Procedure will be stored within Policy Zone

7. DOCUMENT CONTROL INFORMATION

Document Name	Safeguarding Procedure
Owner	Director of Student Services and Success
Version Number	Version 3
Equality Analysis Form Submission Date	
Approval Date	06/11/2018
Approved By	University Executive Committee
Date of Commencement	26/05/2025
Date of Last Review	26 May 2025
Date for Next Review	01 June 2027
Related University Policy Documents	See section 6
For Office Use – Keywords	

Annex 1

Safeguarding Definitions

- Child or young person: A person who has not yet reached their 18th birthday.
- Adult at risk: Any individual who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and/or support
- Safeguarding: The protection of children and adults-at-risk from abuse and neglect
- Abuse: Abuse is a violation of human and civil rights by another person. It may be planned or unplanned and there is no exhaustive list of what may constitute abuse or exploitation, but it includes:
  - A single act, of any scale, which causes harm and can be of varying degrees;
  - Repeated acts of a similar or different nature;
  - Intentional or unintentional;
  - An act of neglect or a failure to act on the part of someone who has caring responsibilities;
  - Physical abuse and violence (see the definition of 'Physical abuse');
  - Verbal abuse and insults;
  - Sexual abuse and sexual harassment;
  - Emotional abuse;
  - Financial exploitation;
  - Bullying and harassment;
  - Exposing children / vulnerable adults to inappropriate materials such as pornography, violent films, cruelty;
  - Allowing children / vulnerable adults to be present when others are taking drugs or consuming high levels of alcohol;
  - Preventing children / adults at risk from attending school;
  - Female Genital Mutilation;
  - Domestic abuse
  - Forced marriage;
  - Honour-based violence;
  - Neglectful behaviours such as being intoxicated while performing a care role and a wide range of other issues, such as discrimination or an attempt to isolate someone;
  - Online abuse;
  - Human trafficking;
  - Discriminatory abuse
- Regulated Activity: Regulated activity is work that a barred person must not do. It is defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA), which has been amended by the Protection of Freedoms Act 2012 (PoFA). It excludes any activities carried out in the course of family relationships or as part of any personal, non-commercial relationships. (Regulated activity with children in England and Wales - GOV.UK);

- Prevent/Prevent duty: Through the Counter-Terrorism and Border Security Act 2019 all Universities and other Public Authorities are under a legal requirement, or duty, to have 'due regard' to preventing people from being drawn into terrorism;
- Radicalisation: Defined in the Prevent duty guidance as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups";
- Terrorism: An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The terrorist 'action' can be that of individuals acting alone or as part of organised or well-trained groups. The Terrorism Act 2006 created a number of 'offences related to terrorism', including encouraging terrorism, glorifying terrorism, disseminating terrorist publications, training for terrorism and preparing terrorist acts;
- Extremism: Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - negate or destroy the fundamental rights and freedoms of others; or
  - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - intentionally create a permissive environment for others to achieve the results in the above ([New definition of extremism (2024) - GOV.UK)](#)

- Collaborator: Organisation or individual conducting academic activity on behalf of Keele University e.g. research or innovation projects.

Please find below some more detailed definitions of Abuse which can involve harm that is caused by anyone who has power over another person; which may include family members, friends, unpaid carers, health or social care workers and organisations. The following are recognised forms of abuse:

- Abuse (Physical): may involve hitting, slapping, pushing, shaking, throwing, poisoning, misuse of medication, restraint or inappropriate physical sanctions, burning or scalding, drowning, suffocating, or otherwise causing physical harm, including by fabricating the symptoms of, or deliberately causing, ill health to another;
- Abuse (discriminatory): including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment;
- Abuse (Emotional): including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks and can also be persistent emotional ill-treatment such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children;
- Abuse (Sexual): Involves forcing or enticing a person to take part in sexual activities. The activities may involve physical contact, including penetrative or non-penetrative acts. This

may include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways;

- Abuse (Neglect): 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, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a child's basic emotional needs. Including ignoring medical or physical care needs, overuse of medication, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating;

- Abuse (Self Neglect): Failure of an adult to take care of themselves that causes or is reasonably likely to cause within a short period of time, serious physical, mental or emotional harm or substantial damage to or loss of assets;

- Abuse (Financial or Material): May include 'theft, fraud, exploitation, either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain. Coercion in relation to an adult's financial affairs or arrangements, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits' (DoH, 2000, p. 9);

- Abuse (Historic): Abuse which took place in the past. If a student tells a member of staff about historic abuse, this must be referred using the reporting procedure in section

- Abuse (Institutional): Including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment;

- Abuse (Peer): Abuse carried out by children and young people. This recognises that children, particularly those living away from home, are also vulnerable to physical, sexual and emotional abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult;

- Forced / Arranged Marriages: A forced marriage is one in which one or both parties are married without their consent. An arranged marriage becomes a safeguarding concern where the person concerned is a child or is an adult who lacks mental capacity.

Annex 2

Report a Concern Form

Please complete if you have a safeguarding concern and send to Safeguarding.keele@keele.ac.uk. Please ensure the document is password protected.

If someone is at immediate risk of harm call 999.

Ref: (to be completed by Safeguarding Coordinator/Lead)	
Date:	
Name & role:	
Contact details:	
Name of child/young person/adult:	
Gender:	
Age:	
Details of incident (date and location if relevant):	
Nature of allegation/concern:	
Any other observations or information:	
Action taken:	

Annex 3

Action Form

To be completed by Safeguarding Coordinators and Leads when taking action after receiving a safeguarding concern form. Please ensure this document is stored securely and is password protected.

Once complete it should be sent to Safegaurding.keele@keele.ac.uk to ensure full and accurate record keeping.

Ref (same as concern form):	
Date concern form received:	
Name & role:	
Contact details:	
Referral information (name and date):	
Action taken (+ initials and date):	
Action taken (+ initials and date):	
Action taken (+ initials and date):	
Action taken (+ initials and date):	
Action taken (+ initials and date):	
Action taken (+ initials and date):	

Annex 4.

Safeguarding Contacts

To report any safeguarding concerns, please email: Safeguarding.keele@keele.ac.uk

If there is an immediate risk of harm, or threat to life, please call 999.

Other useful University Safeguarding contacts:

- Strategic Safeguarding Lead: Katie Laverty, Director of Student Services and Success. Email: k.laverty@keele.ac.uk
- Designated Safeguarding Lead: Alison Felton, Head of Student Wellbeing. Email: a.felton@keele.ac.uk
- Head of Campus Safety: Chris Harrington. Email: c.g.harrington@keele.ac.uk
- Human Resources Safeguarding Lead: Nicola Ratcliffe, Deputy Director of Human Resources. Email: n.l.ratcliffe@keele.ac.uk
- Student Services Safeguarding Coordinators: Student Experience and Support Managers
- Chaplaincy: Stephanie Couvela, Coordinating Chaplain. Email: s.couvela@keele.ac.uk
- Global Student Recruitment and Admissions: Adam Hall, Associate Director of International Student Recruitment. Email: a.hall@keele.ac.uk
- Ant Sutcliffe, Associate Director Higher Horizons. Email: a.g.sutcliffe@keele.ac.uk
- Students' Union (Advise and Support at Keele): Matt Steele, Membership Services Manager (Advice & Advocacy). Email: m.steele@keele.ac.uk.
- School of Nursing and Midwifery: Emily Salt. Email: e.a.salt@keele.ac.uk
- Sport: Mike Huss, Operations and Active Lifestyles Manager. Email: m.d.huss@keele.ac.uk
- Keele Day Nursery: Wendy Foster, Nursery Manager Email: w.foster@keele.ac.uk Telephone: 01782 734410 (internal ext. 34410)

External Contacts

Staffordshire Children's Advice and Support Service is a county-wide telephone enquiry service. If you have a concern regarding a child, think a child is being harmed or at risk of being harmed, or are worried that a child is living in circumstances where they are being treated badly/and or not cared for properly, please contact 0300 111 8007. If you cannot reach them by telephone, please make your enquiry online.

Telephone lines are open:
- Monday to Thursday 08:30 to 17:00
- Friday 08:30 to 16:30

Outside of the hours above, or on weekends and bank holidays, please contact the Emergency duty Team on 0345 604 2886.

Local Authorised Designated Officer (LADO)

LADOS provide guidance and oversee cases where there is a concern about a person who is employed to work with children. Any concern would come via First Response who would take the information to ascertain firstly if there is a role for a social worker and if the threshold is not met will liaise with the LADO. The LADO can be contacted by telephoning Staffordshire Children's Advice and Support Service on 0300 111 8007.

NSPCC

If you are worried about a child you can contact professional counsellors at the NSPCC 24/7 for help, advice and support. You can call them on 0808 800 5000 or email help@nspcc.org.uk.

Adults

If you think someone who has care and support needs is being abused or you think their safety is at risk, then it is important to report your concerns by contacting Staffordshire County Council.
To report concerns about an adult please contact:

Phone: 0345 604 2719
Monday - Thursday* 8:30am - 5pm
Friday: 8:30am - 4:30pm
*Excludes Bank Holidays

This number is to refer concerns about abuse of an adult at risk. If you have other welfare concerns for an adult please contact Staffordshire Cares.

Police

The Police should be contacted if there is an immediate risk identified by calling 999.

The Police also have a dedicated Prevent team. To get in touch with the local Prevent team at Staffordshire Police call 101.

Annex 5.

Staff Guidance for working with Under 18s

Guidance for staff: Maintaining appropriate boundaries with students U18.

At Keele, we have a small number of students who will turn 18 within their first year with us. This Guidance Note sets out important guidelines for University staff and all other individuals acting on behalf of the University (e.g. academic staff, volunteers, contractors, third party employees, temporary/interim staff members, consultants, etc.) to follow when working with anyone who is U18 or an Adults at Risk.

Adhering to these practical guidelines will help to maintain appropriate boundaries. This Guide should be read in accordance with the University's Safeguarding Policy.

When working with U18s and Adults at Risk, do:

- Treat all students with respect and dignity.
- Seek support from your line manager or Safeguarding Coordinator or Lead if you are unsure about how best to interact with U18s or Adults at Risk that you are dealing with.
- Familiarise yourself with the signs of abuse or neglect that could suggest a safeguarding concern is required.
- Ensure you have completed the University's mandatory Safeguarding training
- Ensure you have completed the University's Prevent training.
- Ensure you have read the University Safeguarding Policy and Procedure.
- Plan interactions, as far as your role allows, that take place in the company of others to ensure that an allegation of improper behaviour does not arise.
- Ensure that when conducting a meeting, you are either with another colleague, you meet in a room shared by other employees, or the room has a glass door where other employees can see you or (only where appropriate). If this isn't possible, rearrange the meeting for a more convenient time when others can be present. Be consistent in applying the boundaries of your role when supporting/advising students and explain these to students, where required.
- Be aware that others might misconstrue your speech and behaviour, however well-intended, and do your best to ensure that your intentions and boundaries are clear.
- Consider the balance needed between respecting people's right to privacy and taking any allegations or concerns of abuse seriously.
- If you have any concerns regarding the wellbeing or behaviour of any student, particularly an U18 or Adult at Risk, contact Student Services or safeguarding.keele@keele.ac.uk.

When working with U18s and Adults at Risk, do not:

- Delay when responding to any concerns or allegations made by a child or Adult at Risk or reporting these to a Safeguarding Coordinator or Lead.
- Share your personal details (personal mobile number, personal email address, home address) with any student or parent.
- Share overly personal information (e.g. about your background, your history, your mental health, your family) with students, as this can easily blur the boundaries of your role and send a message to the student that you are their friend rather than a member of staff.
- Communicate with students using any personal social media accounts, sites or apps.
- Use your car (or a University vehicle) to transport a lone student – except in rare emergency situations, where permission has been granted by a supervisor or line manager.
- Physically touch or comfort a student (and, if they initiate physical contact for whatever reason, break away from this as soon as you are able and make a file note).
- Be overly familiar or take part in inappropriate behaviour or contact
- Form a relationship (including a platonic relationship)
- Trivialise abuse or allow bullying or abusive activities (e.g., by downplaying an 'initiation ceremony').
- Take photographs or videos without appropriate consent.

Annex 6.

Online Safeguarding Guidance

1. **Introduction**

We recognise our responsibility to develop awareness and promote safeguarding responsibilities and are committed to practice which reflects this.

This guidance should be read in conjunction with the University's Safeguarding Policy and Procedure and has been developed to assist University staff and students to safely use online platforms.

This guidance on the use of online platforms applies to staff, students, contractors, collaborators and volunteers interacting with anyone aged under 18, or any adult at risk, whether they are a current student, prospective student, or otherwise participating in University-led activity. Relevant activities would include tutorials, webinars, virtual tours, outreach activity, research and innovation projects, recruitment and admissions, or student support (including Professional Services and Academic/Learning Support).

2. **Safeguarding and Online Abuse**

Children and adults-at-risk may be subject to abuse via social media, text messages, emails, or during online chats and other interactive online activity. Abuse can take many forms, but includes cyberbullying, emotional abuse, grooming, sexting, sexual abuse and sexual exploitation. The NSPCC provides further detailed advice on online abuse in relation to children.

3. **Assessing and managing risk**

A safeguarding risk assessment should be undertaken for any new online activity involving children or adults-at-risk, which is not covered by an existing risk assessment.

A Safeguarding Risk Assessment should take into account things such as:

- Whether the platform being used has a "moderator" with oversight of the online activity or has built-in capability to identifying inappropriate language or images.
- If the platform used is not moderated or otherwise monitored, will a responsible adult (teacher, parent or carer) also be online.

  Note. When possible, ALWAYS avoid one-to-one online interaction with anyone you believe may be aged under 18 if no other trusted adult is also involved in the call, if this situation occurs by accident, for instance because a participant has lost connection, you are advised to terminate the meeting and reschedule it.

- Whether the platform being used is approved by the University. Check with IT Services before accepting an invitation to use an unknown online platform hosted by another organisation.

In addition:

- Ensure that all participants understand who is taking part and who will be able to see or hear them.
- Ensure that all those involved, and any trusted adult also present, are aware of what platform is being used and its constraints and limitations with respect to safeguarding and moderation of content.
- Ensure that the background environment which may be visible to all participants is appropriate, blurred, or replaced with an appropriate picture/image.
- Ensure that appropriate precautions are taken to ensure privacy and confidentiality. If working from home do all that is reasonable possible to ensure that family members cannot view participants or overhear the conversation.
- Ensure that all pop-ups or notifications of income emails etc. are disabled during any activity where your screen is or may be visible to participants.
- Ensure that no contact details are exchanged during the activity.
- Ensure that staff and students who engage in University-related online activity that may involve children or adults at risk, receive safeguarding training.
- Ensure that staff have read and understood the policy, procedure and guidance on the [University's safeguarding webpages](#).

4. Online Platform

All online activities which involve participants that are, or maybe under 18 or adults at risk must be hosted on a platform that has been approved for that use by IT Services.

Any such platform **must** have the following features:

- The ability to restrict access so that only the intended participants may take part.
- Access to sensitive personal information, including contact information (email, mobile phone, social media) are only available to the meeting organiser / host and can be kept confidential.
- The ability for the host to remove anyone who is behaving in an inappropriate manner.

Careful consideration must be given to the suitability of a platform for its intended used.

5. Guidance for online events and meetings

In addition to the general guidance provided above on risk assessments, training and online platforms, also consider the points below when engaging online with participants who are aged under 18 or who are adults at risk:

- Where possible / practical always record sessions, but always make it clear to the participants that the session is being recorded.
- Always get parental approval if involving anyone under 16.
- Avoid "live sessions" when at all possible for anyone under 16, (i.e. use recorded content with no live interaction).
- Do not let participants share screens.
- Do not let participants directly contact any other participant i.e. all chat goes though the host so that it can be moderated.

- Always have a second member of staff on the session to monitor and moderate the chat boxes
- Use platforms that allow you to disable the participants' cameras and microphones when this is desirable, for instance if a participant becomes disruptive.
- Use waiting rooms to monitor and control who joins the meeting.
- Set out "community rules" so that participants are aware of the expected behaviour in the online session.
- Ensure the host is aware of the University's Safeguarding Policy and Process and is aware how to escalate concerns.
- Ensure the content is appropriate for the participants' age group.
- Ensure participants are aware of how to raise concerns if they should see or hear anything upsetting or inappropriate in the course of the online event.

Any concerns regarding safeguarding should be reported to safeguarding.keele@keele.ac.uk.

Annex 7

Procedure for Sharing Information Regarding New Students Under the Age of 18

1. Introduction

1.1 This procedure forms part of the University's Safeguarding provision and should be read in conjunction with the University Safeguarding Policy and Procedure, and the University Under 18's Admissions Policy and Procedure.

1.2. This procedure outlines the processes in place to ensure any students under the age of 18 on enrolment are adequately supported, and to ensure staff are aware of their responsibilities when working with students under the age of 18.

1.3 The University is an adult education environment and the Admissions U18 policy and procedure (including risk assessment) ensures that the University can consider any safeguarding mitigations and support requirements for students under the age of 18. The University does not provide health or social care services and does not act loco parentis for students.

2. Procedure and Responsibilities

2.1 Following the University's admissions procedure, Global Student Recruitment and Admissions (GSRA) will provide a list of students who will be under the age of 18 when they are due to enrol at Keele. This list will consist of key information to allow Keele staff to be aware of under 18's, for example within our accommodation setting.

2.2 The list of under 18 students will be sent to:

Member of staff	Area responsible for	Responsibility
Director of Student Services	All areas of Student Services	Awareness of under 18's as University Safeguarding Lead
Heads of Faculty Operations	Areas within Faculties	Ensuring academic members of staff are aware of under 18's where required. Ensuring the relevant academic members of staff have received the guidance on working with U18's
Head of Student Wellbeing	All areas of Student Services	Circulate list to the Student Experience and Support team, along with guidance regarding working with Under 18's Ensure appropriate processes are in place to address any support related issues for under 18's

Operations and Active Lifestyles Manager	All University organised sports activities	Ensure appropriate processes are in place for sports teams/activities for under 18's
Head of Campus Safety	University Campus, including accommodation. Circulation to estates and campus services	Ensure processes are in place for supporting under 18's on campus Ensure processes are in place for staff entering accommodation where under 18's reside along with guidance regarding working with under 18's
Head of Student Records and Awards	University Records system	Ensure processes are in place for recording information for students under 18
Student Accommodation Manager	Offering places in accommodation Liaising with estates regarding accommodation	Ensure that processes are in place for under 18's applying for on campus accommodation Circulate list to Residence Life Managers (day and night) Ensure processes are in place for staff entering accommodation where under 18's reside along with guidance regarding working with under 18's
Residence Life Managers (day and night)	Student Support within university accommodation	Ensure processes are in place to address and support issues for under 18's living in university accommodation along with guidance regarding working with under 18's
Chief Executive Officer Student's Union	Student's Union Forward to Chair of KPA	Ensure processes within the student union are in place for admittance of under 18's into the premises along with guidance regarding working with under 18's

2.3 An updated list will then also be sent following enrolment.

2.4 At all times the University will comply with GDPR requirements and students can find further information regarding how we share information in the Privacy Notice for Students and in the University's Information sharing with Emergency Contacts Code of Practice