

SAFEGUARDING POLICY (AND ASSOCIATED SAFEGUARDING PROCEDURE)

1. INTRODUCTION

This Policy sets out the University's approach to preventing and reducing the risk of harm to children and adults at risk, providing a safe environment for children and adults to visit and participate in activities at the University, whilst also ensuring appropriate measures are taken when they are in contact with University staff, workers, volunteers or students.

We have responsibility to safeguard the welfare of our students and we recognise our responsibility to develop awareness of safeguarding responsibilities¹ and are committed to practice which reflects the University's duty of care and protects children and adults at risk from harm.

We are committed to working in partnership with those for whom we have a duty of care and with appropriate individuals and agencies to promote safeguarding.

'Students' within this document refers to all learners within the University, including those enrolled on undergraduate programmes, postgraduate programmes, online only programmes and apprenticeships.

1.1 Purpose

This Policy outlines the University's approach in line with our statutory and moral obligation to protect children and adults at risk from harm, abuse, neglect and exploitation. The associated procedure outlines the steps staff should take to ensure safeguarding procedures are followed and it is intended to support compliance with the legal duties placed on the University by the Safeguarding Vulnerable Groups Act 2006 (as amended) and the Counter-Terrorism and Border Security Act 2019.

1.2 Scope

This Policy applies to activities which take place: (a) on University premises, (b) on or off campus, including activities operated as part of a collaborative provision within the UK or overseas. (c) during off-site placements (d) during other off-site activities for which the University is responsible. The University also reserves the right to request appropriate Safeguarding policies and assurances from contractors used on and off premises (e) all those representing the University, including (but not limited to) staff, students, student ambassadors, volunteers, staff with casual contracts or

¹ The guidance and legislative framework that underpins this document includes Working Together to Safeguard Children (HM Government, 2018), UN Convention on the Rights of the Child, Children Act 1989 and 2004, Sexual Offences Act 2003, Mental Capacity Act 2005, Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012, The Children and Families Act 2014, Care Act 2014, Information Sharing (HM Government 2018), What to do if you're worried a child is being abused: Advice for practitioners (HM Government 2015) and Keeping Children Safe in Education (Department for Education 2016).

temporary staff. It also applies to all academic programmes, including (but not limited to) Foundation Year, Undergraduate, Postgraduate (Taught and Research), Apprenticeships and online programmes.

Any external groups, organisations or companies holding events or activities on University premises which may involve children or adults at risk must provide assurances that they have read and understood this Policy and that they have their own adequate Safeguarding Policies in place when using Keele facilities (see section 3.1(c) of the procedure).

2. POLICY

The Policy aims to:

- Appoint a University Executive Committee level lead to take strategic responsibility for safeguarding and a University Safeguarding Lead to oversee the Policy and Procedure, and be a point of contact for concerns related to a child or adult at risk;
- Promote a culture of listening, taking account a person's wishes and feelings, and prioritise the safety and wellbeing of children and adults at risk in line with good practice and legal requirements;
- Provide clear links with multi-agency departments to deliver assurance to parents, carers and other parties that the University takes reasonable steps to manage risks and keep children and adults at risk safe;
- Ensure appropriate action is taken to prevent and report any safeguarding concerns where necessary;
- Ensure that approaches to safeguarding are aligned to those adopted by statutory agencies;
- Ensure that all University staff, students, contractors and visitors understand their roles and responsibilities in respect of safeguarding;
- Provide key safeguarding staff with information to support the application of the Safeguarding Policy and Procedure;
- Identifying staff with clear safeguarding responsibilities to ensure individuals working with children and/or adults at risk are deemed not to pose an unacceptable risk to vulnerable groups;
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with University staff, students or volunteers, whether the harm has taken place on University premises or not;
- Provide good quality advice and information about support and services to help protect adults and children from abuse and harm, or respond to identified needs. This includes specialist safeguarding responses, general support and targeted support that will help reduce vulnerability and safeguarding incidents;
- Ensure safe recruitment practices are followed by preventing unsuitable people from working with children.

3. LEGAL CONTEXT

This Policy is a University-wide approach to ensure that our duty of care to safeguard is undertaken. We will take such steps as are reasonable to ensure that children, young people and adults who may be at risk are safe, and that policies and processes are in place to reduce the risk of

harm. We will fulfil our duty to have due regard to the need to prevent students from being drawn into terrorism as per s26 Counter-Terrorism and Border Security Act (2019).

4. DEFINITIONS

A full list of definitions is located in Annex 1 of the Procedure.

5. ROLES AND RESPONSIBILITIES

The University expects all staff and those contributing to its activities to follow the Safeguarding Procedure to promote the welfare of children and adults at risk. Failure to follow this may lead to disciplinary action.

Role Definitions

Strategic Safeguarding Leads

Title Responsibility: Accountable for safeguarding arrangements at Keele University.

Role Descriptor: Providing senior leadership for safeguarding, reporting to the Vice-Chancellor and Council when required. Ensuring there are appropriate safeguarding arrangements in place to meet statutory requirements for the organisation.

Named Person: Director of Student Services and Success (Safeguarding) and Pro Vice Chancellor (Education) Miller (Prevent)

Safeguarding Lead

Title Responsibility: Responsible for operational safeguarding provision at Keele University.

Role Descriptor: Providing centralised operational management for safeguarding provision and supporting the Safeguarding Coordinator roles at Keele. Being a central contact for concerns and external referrals and the key contact for external Safeguarding Boards and other relevant external partners. Overall responsibility for updating Safeguarding Policy and Procedure.

Named Person: Head of Student Wellbeing.

Operational Safeguarding Leads (Prevent)

Title Responsibility: Responsible for operational safeguarding provision at Keele in relation to Prevent.

Role Descriptor: Providing centralised operational management for safeguarding provision under Prevent. To support the Safeguarding Coordinator roles at Keele. Manage communications through governance arrangements both internally and externally. Key contact with Staffordshire Police Prevent team and the Regional Prevent Coordinator. Offering advice, supporting and delegating tasks to Safeguarding Coordinators.

Named Persons: Head of Student Wellbeing and Head of Security, Nigel Manning

HR Safeguarding Lead

Title Responsibility: Responsible for managing safeguarding matters with Keele staff.

Role Descriptor: Provides HR advice and guidance for Keele's safeguarding provision. Works along the Safeguarding Lead to ensure HR support for Keele staff and those on atypical contracts. Ensures appropriate processes are followed according to HR standards, including Safer Recruitment. Support HR Managers and Advisers to work directly with Staff connected with safeguarding issues.

Named Person: Deputy Director of HR

Safeguarding Coordinators

Responsibility: To provide consistent and accurate safeguarding advice, training and support to Keele staff and students.

Role Descriptor: To provide a point of reference in allocated areas to support staff to manage safeguarding issues. Be role models in order to ensure a culture of safeguarding is adopted across the organisation. Ensure information and advice is accurate and reflects current best practice.

Key Tasks: Attend and contribute to Keele Safeguarding Network. Work directly with staff and students where safeguarding issues are presented, liaising with other Safeguarding Coordinators and the Safeguarding Lead(s) when required. Complete or support staff to complete safeguarding referrals and ensure they are sent to centralised location to ensure appropriate record keeping. Attend training events to ensure practice is current.

(Named Persons can be located on Annex 5 within the Safeguarding Procedure.)

In addition to the University Safeguarding Leads, other areas of the University with Professional Statutory and Regulatory Bodies (PSRB) requirements and additional Safeguarding requirements may have their own Safeguarding Leads who work closely with the University Leads.

5. SAFEGUARDING PROCEDURES

This Policy requires that any suspicions and allegations involving harm to children and adults at risk are referred to Safeguarding Coordinators to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police, local authority and/or fulfilling the legal duty to refer information to the DBS as required. **If there is an immediate risk of harm to others, the procedure laid out in the Safeguarding Procedure 4.1.a must be followed.**

The Safeguarding Policy should be used as the basis for preventing harm to children and adults at risk. If members of staff or students are concerned that another University representative is not following the procedure, they should contact the Safeguarding Lead for the University.

We recognise that individual safeguarding policies and practices will be developed in addition to the University policy, but that they will be in line with University policy and PSRB professional practices. Examples include the Health and Care Professions Council, General Medical Council and Ofsted. It is the responsibility of the Academic School/ Safeguarding Leads in these areas to ensure robust practices are in place.

Detailed procedures can be found in the Safeguarding Procedure document which accompanies this Policy.

6. RELATED POLICIES AND PROCEDURES

The following University Policies and Procedures, contained within the Policy Zone², should be read alongside this Policy and Procedure:

- [Admissions Policy, Admissions Interview Policy & Admissions Under 18's Policy](#)
- [Alcohol Policy](#)
- [Staff Drug and Alcohol Policy](#)
- [Bullying and Harassment Policy and Procedure](#)
- [Code of Practice for Personal Tutoring](#)
- [Data Classification and Handling Guidance](#)
- [Data Protection Act Policy](#)

² <https://www.keele.ac.uk/policyzone/>

- [Dignity and Respect Policy and Procedure](#)
- [Disclosure and Barring Service Policy](#)
- [Policy on the use of Disclosure and Barring Service Disclosure Checks – Staff and Volunteers.](#)
- [External Speaker Approval Procedure](#)
- [Freedom of Expression Code of Practice](#)
- [Gender Segregation Joint Code of Practice](#)
- [Group Social Events Code of Conduct](#)
- [Health and Safety Policy Statement](#)
- [IT Conditions of Use](#)
- [Social Media Guidance](#)
- [Lone Working Policy](#)
- [Personal Relationships at Work Policy](#)
- [Religion and Belief Policy](#)
- [Sexual Violence and Misconduct Policy and Procedure](#)
- [Staff Disclosure and Barring Service Policy](#)
- [Support to Study Policy](#)
- [Whistleblowing Policy](#)
- [Safeguarding in Research and Innovation](#)
- [Disciplinary and Appeals Procedure for Academic Staff](#)
- [Staff Disciplinary and Appeals Procedure \(Non-Academic\)](#)

7. REVIEW, APPROVAL & PUBLICATION

- This Policy and associated procedure will be reviewed every two years by the Director of Student Services and Success;
- This Policy 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.

8. APPENDIX

The procedures in relation to dealing with safeguarding concerns are contained in appendix 1.

9. DOCUMENT CONTROL INFORMATION

| | |
|--|---|
| Document Name | Safeguarding Policy |
| Owner | Katie Laverty, Director of Student Services and Success |
| Version Number | 0.2 |
| Equality Analysis Decision and Date | 06/11/2018 |
| Approval Date | 7/2/2022 |
| Approved By | UEC |
| Date of Commencement | 7/2/2022 |
| Date of Last Review | 01/02/2022 |

| | |
|--|------------|
| Date for Next Review | 31/01/2024 |
| Related University Policy Documents | |
| <i>For Office Use – Keywords for search function</i> | |

Appendix 1



SAFEGUARDING PROCEDURE

1. PURPOSE

This procedure should be read alongside the University Safeguarding Policy.

We recognise our responsibility to develop awareness of safeguarding responsibilities and are committed to practice which reflects the University's duty of care and protects children and adults at risk from harm. Every member of staff should make themselves familiar with the University Safeguarding Policy and support which exists within Keele and make referrals when concerns first arise.

Prevention and early action are important elements of any response to safeguarding children and adults at risk. This means taking steps to stop or reduce issues or concerns which could lead to abuse or harm taking place.

This procedure is for managing suspicions and allegations and to ensure staff understand their responsibilities to safeguard children and adults at risk.

2. SCOPE

This procedure provides a guide to staff about their statutory and moral obligation to protect children and adults at risk from harm, abuse, neglect and exploitation. It is also intended to outline the steps staff should take to support students who appear to be at risk of being drawn into terrorism or into extremist ideologies. It is intended to support compliance with the legal duties placed on the University by the Safeguarding Vulnerable Groups Act 2006 (as amended) and the Counter-Terrorism and Border Security Act 2019.

3. OUTLINE PRINCIPLES

Safeguarding is everyone's responsibility. All members of staff who come into contact with children, young people and adults at risk are in a position of trust and have a duty of care to act if there is a cause for concern.

University staff should familiarise themselves with the 'Personal Relationships at Work Policy'. All staff members should treat any children and adults with whom they come into contact, with dignity and respect. Keele has a [Whistleblowing Policy](#) which allows staff to raise concerns should they think this is not being adhered to.

Staff should familiarise themselves with Keele's [IT – Conditions of Use Policy](#) to determine unacceptable use of IT equipment that includes information on the creation, transmission or display of any offensive, obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material.

The University encourages staff and students to adopt a responsible approach to working with children and adults at risk and will respond promptly to all concerns raised under the Policy. Staff and students should be reassured that all reports, made in good faith, will be dealt with fairly, regardless of the outcome. Allegations made maliciously will be dealt with following the University's staff or student disciplinary procedures.

Whilst it is not the responsibility of all University staff to investigate, make judgements or provide a response on safeguarding matters, it is our responsibility to follow this Procedure if there is a cause for concern.

All members of staff should:

- understand what abuse is (see annex 1 of the Procedure);
- listen carefully to children, young people and adults at risk;
- be aware of and act in accordance with the Safeguarding Policy;
- participate in appropriate Safeguarding and Prevent training when required;
- consult with and take advice from the University's Safeguarding Coordinators and Leads when there is a reason to believe that a student may be at risk of being drawn into terrorism or that a child or adult at risk is at risk of harm;
- not put children or young people at risk of harm.

The role of a Safeguarding Coordinator is to:

- offer an initial point of contact, should any student or staff member in the department have any concerns relating to safeguarding;
- highlight and champion best practice related to safeguarding;
- undertake appropriate prevent and safeguarding training;
- train others as appropriate;
- ensure appropriate local procedures are in place;
- ensure referrals to the appropriate third parties are made when deemed necessary;
- Ensure cases and concerns are escalated when required;

It is the role of an Academic School to ensure:

- staff are aware of any safeguarding implications on any teaching or other practices (including placements, field trips, visits and other activities);
- that staff and students are appropriately trained;
- that they comply with any safeguarding requirements required by their Professional Statutory and Regulating Bodies (PSRB);
- that any safeguarding concerns are escalated as appropriate

3.1 The following principles should be considered when dealing with safeguarding issues:

a. Disclosure and Barring (DBS) and Recruitment Practices

The University [Staff Disclosure and Barring Services Policy](#) 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 vulnerable adults.

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.

Safe 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 staff [University Policy](#) 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.

Keele's recruitment and selection procedures are designed to identify any persons (staff/volunteers) who are already known / believed to be unfit to work with adults at risk or children and must be closely followed. Persons working in a regulated position at Keele (according to the guidance provided by the Disclosure and Barring Service), who are not directly employees of the University, will also be required to undergo DBS checks. However, these checks may have to be carried out by their employer. Where a contractual relationship exists between Keele and the organisation, this requirement, where applicable, will be reflected in contracts.

Further advice can be sought from the HR Team.

b. Freedom of Speech

The University has a [Freedom of Expression Code of Practice](#) intended to ensure compliance with legal requirements, including the Prevent duty guidance and the duty to ensure freedom of speech within the law for students, staff and visiting speakers using the University's premises. This is supported by the procedures for the approval of student events (operated in conjunction with Keele Students' Union) and the Speaker and Event Approval Procedure for the monitoring of staff and externally booked events. Further information can be found on the University's [website](#).

c. External Organisations Booking the use of Keele Facilities

Safeguarding the wellbeing of adults or children visiting the campus (without their parent/guardian) is the responsibility of the organiser of the activities.

Keele expects external organisations using its facilities to have safeguarding arrangements, risk assessments and training in place when organising and delivering activities and events for children or vulnerable adults. All external organisations must have obtained the appropriate checks on their staff or volunteers, in line with the Disclosure and Barring Service requirements and the University's [Speaker and Event Approval Procedure](#). It is the responsibility of the area of the University engaging with the external provider to ensure all safeguarding arrangements in place. All

areas of the University are required to comply with the Speaker and Event Approval Procedure or they will not be permitted to use Keele facilities.

All areas of the University should satisfy themselves that appropriate safeguarding measures, risk assessments and procedures are in place for any internal or external events.

d. Under 18's Admissions Policy

The University can admit students who have not reached their 18th birthday by the date of their admission 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](#).

Regulated activity, as defined by the Protections of Freedoms Act 2012 and those involved in "regulated activity" with these students will require clearance from the Disclosure and Barring Service (DBS)³. See also 3.1 (a) above.

Following a risk assessment process, the University may not admit or 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 Schools 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.

e. Online Abuse and Safeguarding

Children and Adults at Risk may suffer abuse via social media, text messages, and emails or in the course of online chats and other interactive online media. Abuse can take many forms, but includes cyberbullying, emotional abuse, grooming, sexting, sexual abuse and sexual exploitation.

The NSPCC provides detailed advice on online abuse in relation to children which can be found here: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/online-abuse/#what-is>

Any concern related to online abuse should be reported to a Safeguarding Coordinator, however, other University polices and processes may be relevant if the concern relates to issues such as [bullying and harassment](#), use of IT, [use of social media](#), or staff or student conduct. A full list of related polices and processes can be found in section 6 of the University Safeguarding Policy.

f. Confidentiality and Information Sharing (see seven rules for information sharing Annex 7)

Safeguarding issues can present information sharing challenges and it should be made clear when staff are discussing sensitive issues that limitations exist in relation to confidentiality. For example, whilst students and staff have the right to receive a confidential service, appropriate information sharing is an essential part of the provision of safe and effective support.

Explicit guidelines exist in relation to confidentiality regulated by PSRB's. Where a failure to disclose information may expose a member of staff, student or others, to risk of death or serious harm, we

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739154/Regulated_Activity_with_Children_in_England.pdf

have a responsibility to disclose in these circumstances. Staff should bear in mind that these issues are governed by legislation relating to confidentiality, human rights and data protection (including the General Data Protection Regulation, the UK GDPR and the Data Protection Act 2018).

Data protection legislation provides for information sharing where a lawful basis exists. Special category data (e.g. health data, ethnicity) requires additional protections and therefore a second lawful basis for sharing this information.

Additional information can also be found within the [ICO's Sharing Hub and the Government's Information Sharing guidance](#).

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. It should be made clear to anyone disclosing information in any safeguarding discussions that their information will be passed on to the relevant Safeguarding Coordinator, who may have to pass this to a Safeguarding Lead, the Police or Local Authority.

Some examples in relation to safeguarding when there is a need to share information include where the welfare of a child or adult is at risk of harming themselves or someone else, or where a student is at risk of being drawn into terrorism or ideologies that support terrorism.

4. PROCEDURE FOR DEALING WITH A SAFEGUARDING ISSUE

4.1 Identification and assessment of a concern

The identification and assessment of a concern is crucial to understanding how to respond. In some cases the adult/child themselves will disclose that they are experiencing some form of issue or concern. There will be other times when a child or adult does not formally disclose a difficulty, but where one can be interpreted from their behaviour, emotional state or appearance. Sometimes a disclosure may relate to someone else, or it may be determined that someone else is at risk.

a. Recognising Emergency Situations

Deciding whether a situation is an emergency or urgent situation is always in practice a matter of judgement according to the circumstances of the situation, but someone who is expressing concern about the immediate safety of themselves or others would warrant consideration of contacting emergency services.

If there are reasonable grounds for believing that an individual is at immediate threat or there is a threat to the life of any person, action should be taken immediately by calling the Police on '999'. Keele Security Team via their 24/7/365 on Security Control Room on 01782 733004, or in an emergency on internal phone 888. A Safeguarding Coordinator or Safeguarding Lead should be notified as soon as it becomes possible to do so.

b. Identifying someone at risk

There are a number of potential indicators that someone may be at risk (see annex 2). 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 signs that are also specific to students within the University, which may indicate a wellbeing or safeguarding concern, 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 someone may be at risk, but caution should be exercised when assessing a situation. University staff should always seek advice from a Safeguarding Coordinator or Lead if they are concerned about an individual.

4.2 Dealing with a disclosure

The conversation with the person making the allegations needs to be handled sensitively. Such conversations are often challenging and for some people, they can stimulate memories of past personal experiences. The following suggestions may be helpful.

- Listen carefully and respond sensitively without expressing an opinion and without imposing your views and values;
- 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:
 - the person may be low in self-confidence;
 - they may struggle with communication skills;
 - they may not expect to be believed;
 - there may be a background of threat or coercion;
 - there may be 'secondary gains' such as presents, power or attention;
 - they may be protecting others, including an abuser/radicaliser or other potential victims;
 - their experience may have become a normal reality.
- Stay calm and keep listening, without expressing whatever shock or alarm you may personally feel;
- 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 or is a student / staff member of the University;
- Keep the details of the conversation and your notes confidential in accordance with data protection legislation.

When concerns first come to light your role is to listen and to gather and record information. At this stage it would be unlikely you could determine if abuse/harm had taken place. It is important that you accurately record any information gathered. Be discrete, respect the person's privacy and follow the guidance on confidentiality (see 3.1 (e) above). You can also ask if the person is in touch with any support agencies already.

If you are in any doubt about whether an issue needs further action, always contact a Safeguarding Coordinator. See the Safeguarding Policy for contact details.

The member of staff receiving the disclosure should complete the reporting form in annex 3. This should be sent securely to the appropriate Safeguarding Coordinator or Lead. Any concerns can be discussed with a Safeguarding Coordinator or Safeguarding Lead before the form is completed.

Where there is a concern about immediate danger or violence, staff should contact the Police and Security.

4.3 Steps to be taken following a disclosure

The following steps should be followed where there are concerns relating to both a child or adult at risk, or a student at risk of radicalisation:

1. Consider the evidence that is giving rise to your concern and assess how objective it is, e.g. is it a gut instinct, is it based on observation or on an explicit report? The purpose of your reflection here is not to arrive at a definite answer nor is it about determining whether someone is being harmed. It is to clarify if there are good enough grounds to take further action. At all times be mindful of the sensitivity of the issue and specific circumstances, ensuring information is not shared any wider than necessary. Advice can be sought from the University's Safeguarding team if you are unsure.
2. If action needs to be taken, consider whether the action needs to be urgent / emergency. If so, the following steps should be taken: (a) you should contact the police using either the 101 or phone 999 number, (b) inform the Security and the Safeguarding Lead by calling 01782 733004.
3. If the situation is not urgent you should contact the Safeguarding Coordinator for your area who will be able to advise on the next steps.
4. Make a written record of your concerns (using the form in annex 3), immediately after the conversation. This record should be sent securely to the Safeguarding Coordinator and should be written in a way which is clear and understandable to others. The record should include:
 - Appropriate personal details of the child, adult at risk or student (name; age; address; student number. If appropriate; telephone number; email address)
 - The nature of the concern; what has been told to you, using quotations where possible and being careful to be factual. Be objective and do not make assumptions or include personal opinions and interpretations. You may refer to any signs of abuse (See annex 2)
 - The source(s) of information about the concern;
 - Any advice you have given to the child / vulnerable adult / student;
 - What you have discussed with the child, vulnerable adult or student about confidentiality;
 - Names of staff with whom you have discussed the incident;
 - Details of the action you have taken or any referrals you have made (internal and external);
 - Date and name of the person making the record.

4.4 Additional requirements for a disclosure in relation to a child

When the information is provided to the relevant Safeguarding Coordinator, they may ask for more information or further investigation to be carried out, or they may decide they need to act on the information provided and do this on behalf of the University.

If a Safeguarding Coordinator refers a concern to the appropriate external agency (e.g. police, social services, LADO), they may wish to discuss concerns with you, or there may be no further contact, depending on how the matter is dealt with.

If abuse or neglect is suspected or identified the external agency may make further enquiries to establish if any action needs to be taken to prevent or stop abuse.

If the Safeguarding Co-ordinator can give you any feedback on what happens as a result of your concern, they will. It is not always possible to share information about everything that happens.

In safeguarding investigations for both children and adults, any criminal investigation by the Police takes precedence over all other forms of enquiry or University process.

At any point advice can be sought from a Safeguarding Lead.

4.5 Allegations against a member of staff

A member of staff within the University may become aware of concerns related to another member of staff, or a third party might disclose a concern regarding a University member of staff.

The report form in annex 3 should be completed and sent to the HR Safeguarding Lead. Advice from HR should be followed when completing the form. The HR Safeguarding Lead will liaise with the University Safeguarding Lead to determine appropriate next steps. Advice can be from both lead contacts if the reporting member of staff has any concerns about the sensitivity of the information.

It is important that any response is properly coordinated and that events are managed in the right order. Any direct action against a member of staff will as far as possible be with reference to advice and agreement of other investigating agencies (e.g. police; social services).

It is vital that staff do not speak to the alleged perpetrator about the alleged offence until the Safeguarding Lead and HR Safeguarding Lead have been consulted. It is vital that those who are party to information in the context of such allegations do not share this information with anyone except on a need to know basis with Human Resources and the Safeguarding Lead / Safeguarding Coordinator.

If, following consideration and any consultation, the concern is clearly about bad practice rather than abuse, Keele will take the necessary action to advise, manage or instigate disciplinary action against the member of staff about whom the allegation has been made.

Irrespective of the outcome of any police or social services investigations, Keele may consider carrying out its own internal investigation in accordance with its own disciplinary procedures, and disciplinary action up to and including dismissal may result.

The University is required to report instances of misconduct relating to children and adults at risk under the provisions of the 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 has been permanently suspended 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 Director of Human Resources (or someone acting on their behalf).

In the case of students, the reporting will be done by the Director of Student Services (or someone acting on their behalf).

5.0 GETTING SUPPORT

Coming into contact with children or adults in need of safeguarding can have a personal impact. It is common to feel angry or sad, and these feelings can be overwhelming.

Keele University has linked up with the Listening Centre which provides a Counselling service for members of staff. The Service is an external provider which offers a high quality, supportive, confidential service, with qualified and experienced Counsellors. Staff seeking to make an appointment to access counselling or need advice should in the first instance contact the

[Occupational Health Service](#):

Email: occupationalhealth.enquiries@keele.ac.uk

Telephone: 01782 733733 (internal: 33733)

Any students affected by a safeguarding issue can seek support from [Student Services](#).

6.0. RELATED POLICIES AND PROCEDURES

See Safeguarding Policy.

7.0 REVIEW, APPROVAL AND PUBLICATION

- This Policy and associated procedure will be reviewed every two years by the Director of Student Services
- This Policy will be submitted to the University Executive Committee approval together with any subsequent reviews
- The Policy and Procedure will be stored with the Policy Zone.

8.0 DOCUMENT CONTROL INFORMATION

| | |
|--|---|
| Document Name | Safeguarding Procedure |
| Owner | Katie Laverty, Director of Student Services and Success |
| Version Number | 0.2 |
| Equality Analysis Decision and Date | 06/11/2018 |
| Approval Date | |
| Approved By | UEC |
| Date of Commencement | |
| Date of Last Review | 01/02/2022 |
| Date for Next Review | 31/01/2024 |
| Related University Policy Documents | [List all applicable] |

9.0 ANNEXES

Annex 1

Definitions

DBS (Disclosure and Barring Service):

This statutory body helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It was created in 2012 out of the merger of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). The DBS helps to achieve this through criminal record checking and by maintaining two barred lists where information shows individuals pose a risk of harm to children or vulnerable adults.

Child or young person: Applies to a person who has not yet reached their 18th birthday. In legislation and guidance 'child' typically refers to those under the age of eighteen who are still in full time education and 'young person' refers to those under the age of eighteen who have left full time education.

Adult at risk: An adult at risk can be defined as a person over the age of 18 who '...has needs for care and support ...is experiencing, or is at risk of, abuse or neglect, and...as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.' (Care Act, 2014). The Department of Health and Home Office (2000) defines 'an adult at risk' as follows: 'A person aged 18 years or older, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.'

Safeguarding: Is the term used to promote the welfare and protection from harm of children and adults at risk. This term is broader than 'child protection' which refers to activities undertaken to prevent children suffering significant harm. Safeguarding, in addition to child protection, also encompasses protecting children from maltreatment, preventing impairment of children's health and ensuring children grow up in a safe environment.

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 violence;
- 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

Please find below some more detailed definitions 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 4.

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. No one can consent to marriage on behalf of someone else. For further details see: 'Multi-agency practice guidelines: Handling cases of forced marriage' (Home Office, 2009); Forced Marriage (Civil Protection) Act 2008, Article 16(2); the Universal Declaration of Human Rights. 10 / 21

Legal Duty: The University recognises that it is our legal duty to identify where there are safeguarding issues and take appropriate action to address them, in partnership with other organisations that can investigate further and take the necessary action to ensure an effective outcome. Government guidance makes it clear that it is not the University's responsibility to investigate abuse but to take appropriate action to prevent and report it where necessary.

Local Authority Designated Officer (LADO): The role of the LADO is set out in section 11 of the Children's Act 2004 and in the HM Government guidance [Working Together to Safeguard Children \(2018\)](#) (external link). Their role is to give advice and guidance to employers and voluntary organisations; liaise with the Police and other agencies, and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Every agency that works with children and young people should have a Designated Officer whose job it is to liaise with and refer to LADO. The LADO should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

Regulated Activity: activity which is subject to the requirements of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. The following are examples of 'regulated activity', which is defined in Schedule 4 of the Act: Regulated Activity for adults now covers:

- Providing healthcare (regarding physical or mental health) e.g. counsellors;
- Providing personal care;

- Providing social work;
- Assisting with general household matters (bills, shopping etc.);
- Assisting in the conduct of people's own affairs ;
- Conveying adults to, from, or between places where they receive healthcare, relevant personal care or social work because of their age, illness or disability.

Regulated activity relating to children means a person can be engaged in regulated activity because of:

- What they do (activities), e.g. a student who is engaged in research with children and / or vulnerable adults
- Where they work (establishment), e.g. University staff working on Widening Participation projects within Schools
- Who they are (specified position).

Regular unsupervised activities involving children will typically be Regulated Activity. Examples are:

- Teaching; training; instructing; caring for; supervising;
- Providing advice/guidance on wellbeing;
- Driving a vehicle solely for children;
- Regular work in a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises;
- Relevant personal care – even if done as a '1-off' (i.e. it does not need not be a regular activity);
- Registered childcare, child-minding and foster-caring.

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. There is statutory guidance in place that sets out key responsibilities and actions in order to help protect vulnerable people from amongst other things, radicalisation.

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: The current UK definition of terrorism is given in the Terrorism Act 2000. This defines terrorism as 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; Defined in the Prevent duty guidance as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas”.

The Prevent programme (see above) reinforces the message that the University has a role to play in supporting students who are vulnerable to being drawn into terrorism or extremist ideologies which are conducive to terrorism.

Indicators of a safeguarding concern.

Potential indicators: The word 'potential' is used in this context because the 'signs' are precisely that, they signpost rather than take you to a destination. Signs may not always be indicative of abuse and it is advised that those with concerns approach the issue carefully, being aware that to make false allegations of abuse may in itself cause harm.

With both children and adults at risk the clearest sign is an actual report or direct statement, but it may be certain indicators that raise concerns. The relevant signs are generally either physical, behavioural or both:

- Neglected or undernourished appearance;
- A deterioration in appearance and / or mood;
- Unexplained bruising / injuries;
- Unexplained or inappropriate covering up;
- A deterioration in social engagement, accompanied by an increase in fearfulness;
- Children using sexually explicit language or gestures;
- Children using violent gestures or being violent to others;
- Dysfunctional family relationships including domestic violence;
- Emotional indicators such as low self-esteem, unhappiness, fear, distress, anxiety;
- Behavioural indicators such as attention seeking, opposing, withdrawn, insecure;
- Physical indicators such as failure to thrive/faltering growth, delay in achieving developmental, cognitive or educational milestones.

Extent of Harm / Abuse: The extent of harm / abuse is not always easy to quantify. According to the Social Care Institute for Excellence (SCIE), 'significant harm' is a legal concept and one that has not been defined. SCIE (2013) therefore advise professionals to consider the following points:

- The degree of the vulnerability of the person
- The nature and extent of the abuse or neglect
- The length of time the abuse or neglect has been occurring
- The impact of the alleged abuse on the adult at risk
- The risk of repeated or increasingly serious acts of abuse or neglect
- The risk that serious harm could result if no action was taken
- The illegality of the act or acts

Radicalisation: There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism or radicalisation. HM Government 'Channel' guidance indicates that factors which may have a bearing on someone becoming vulnerable can include:

- Peer pressure;
- Influence from other people or via the internet;
- Bullying;
- Crime against the individual or their involvement in crime;
- Anti-social behaviour;
- Family tensions;
- Race/hate crime;
- Lack of self-esteem or identity;
- Personal or political grievances.

Assessment for vulnerability uses a consistently applied vulnerability assessment framework built around three criteria. The three criteria are:

- Engagement with a group, cause or ideology;
- Intent to cause harm; and
- Capability to cause harm.

There may be indicators which raise concerns regarding whether a person has been subject to radicalisation, such as:

- Notable changes in behaviour and mood;
- Expressed support for violence and terrorism or increasingly sympathetic views to terrorist acts;
- Expression of extreme political or radical views;
- Change of appearance;
- Dramatic change of friends;
- Spending excessive time alone;
- Possession of violent extremist literature;
- Attempts to access or contribute to violent extremist websites;
- Possession of material regarding weapons and/or explosives;
- Possession of literature regarding military training, skills and techniques;
- Claims of involvement in organisations;
- Espousing violent extremist ideology;
- Claims of attendance at training camps;
- Claims of involvement in combat or violent activity on behalf of violent extremist group.

Annex 3

Safeguarding Concern Form

Please complete if you have a safeguarding concern and send to your Safeguarding Coordinator via email. Please ensure the document is password protected.

| | |
|--|--|
| 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 4

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.

| | |
|--|--|
| 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): | |
| Action taken (+ initials and date): | |

Annex 5

Key Contacts

Keele Safeguarding Contacts

Strategic Safeguarding Lead: Katie Laverty, Director of Student Services and Success,

Email: k.laverty@keele.ac.uk

Telephone: 01782 734481

Safeguarding Lead: Alison Felton, Head of Student Wellbeing

Email: a.felton@keele.ac.uk

Telephone: 01782 734481

Security: Nigel Manning, Head of Security

Email: n.manning@keele.ac.uk

Telephone: 01782 734440

Human Resources: Nicola Ratcliffe, Deputy Director of Human Resources

Email: n.l.ratcliffe@keele.ac.uk

Telephone: 01782 734376

Student Services Safeguarding Coordinators:

Student Experience and Support Manager – Faculty of Natural Sciences: Hayley Borrett

Email: h.borrett@keele.ac.uk

Telephone: **01782 734481**

Student Experience and Support Manager – Faculty of Humanities and Social Sciences: Janine Cresswell

Email: j.cresswell@keele.ac.uk

Telephone: **01782 734481**

Student Experience and Support Manager – Faculty of Medicine and Health Sciences: Julie Willis

Email: j.willis@keele.ac.uk

Telephone: **01782 734481**

Chaplaincy: James Pritchard, Coordinating Chaplain

Email: j.pritchard@keele.ac.uk

Telephone: 01782 734917 (internal ext. 34917)

Global Student Recruitment and Admissions:

Adam Hall, Associate Director of International Student Recruitment

Email: a.hall@keele.ac.uk

Telephone: 01782 734531

Ant Sutcliffe, Head of Higher Horizons

Email: a.g.sutcliffe@keele.ac.uk

Telephone: 01782 733164

Students' Union (Advise and Support at Keele): Matt Steele, Membership Services Manager
(Advice & Advocacy)
Email: m.steele@keele.ac.uk
Telephone: 01782 734801

School of Nursing and Midwifery: Shirley Heath and Emily Salt
Email: s.l.heath@keele.ac.uk, e.a.salt@keele.ac.uk
Telephone: 01782 679688, 01782 7 38176, 017827 8185

Sport: Mike Huss, Operations and Active Lifestyles Manager
Email: m.d.huss@keele.ac.uk
Telephone: 01782 733343 (internal ext. 33343)

Keele Day Nursery: Wendy Foster, Nursery Manager
Email: w.foster@keele.ac.uk
Telephone: 01782 734410 (internal ext. 34410)

Annex 6

External Referrals

If someone is at immediate risk of harm, this must be reported to the Police by calling 999.

[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](#).

You must never assume that somebody else will recognise and report what you have seen or heard.

Where a crime has been committed or if you're worried about someone's immediate safety, contact the police by dialling [999](#).

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 a adult. If you have other welfare concerns for an adult please [contact Staffordshire Cares](#).

Out of hours

If you have a concern about the safety of a vulnerable adult and need to report it overnight, over a weekend or on a Bank Holiday, contact the Emergency Duty Service:

- **Phone:** [0345 604 2886](tel:03456042886)
- **Fax:** [01785 277321](tel:01785277321)
- **Text:** [07815 492613](tel:07815492613)

Police

Prevent is about working together to build stronger, safer communities. To get in touch with the local Prevent team at Staffordshire Police call 01785 232054 or email: prevent@staffordshire.police.uk. The Head of Security is the University contact for the Police Prevent team.

Seven Golden Rules for Information Sharing:

1. Remember that the General Data Protection Regulation (GDPR & UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or the University's Data Protection Officer (dpo@keele.ac.uk), if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared. Further information on lawful bases/conditions to process sensitive personal data can be found [here](#):
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. See the [University's Data Classification and Handling Policy](#).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose, ensuring that any information is shared securely.