

Safeguarding Policy Guidance Notes

These guidance notes are intended to be read in conjunction with the Safeguarding Policy.

Author	Jenny Clough, Director of Student Services
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1. Who are the Safeguarding Officers?

Safeguarding Lead Officer	Jenny Clough Director of Student Services	j.clough@mmu.ac.uk 0161 247 3324
Deputy Safeguarding Officer	Lyle Millard Head of Inclusion and Pastoral Services	l.millard@mmu.ac.uk 0161 247 3702
Deputy Safeguarding Officer	Karen Morgan Head of Counselling, Mental Health, and Wellbeing Services	k.morgan@mmu.ac.uk 0161 247 3493
Deputy Safeguarding Officer (Apprenticeships)	Helen Walker Head of Apprenticeship Programmes	h.walker@mmu.ac.uk 07990 410 960
Senior Executive Officer	Rachel Lunn Senior Executive Officer	r.lunn@mmu.ac.uk 0161 247 3343
Human Resources & Organisational Development Safeguarding Lead Officer	Kelly Russell Assistant Director of HR Operations	kelly.russell@mmu.ac.uk 0161 247 2997
Strategic Lead for Prevent	Karen Moore Chief Operating Officer	k.moore@mmu.ac.uk 0161 247 1021
Prevent Lead	Alexander Thorley Academic Registrar	a.thorley@mmu.ac.uk 0161 247 3479
Prevent Contact (Student)	Caroline Lord Assistant Academic Registrar	c.lord@mmu.ac.uk 0161-247-2871
Prevent Contact (Student)	Jenny Clough Director of Student Services	j.clough@mmu.ac.uk 0161 247 3324
Prevent Contact (Student)	Kevin Rowan Head of Campus Security	k.rowan@mmu.ac.uk 0161 247 6656
Prevent Contact (Staff)	Louise Neilson Head of Health and Safety	L.Neilson@mmu.ac.uk 0161 247 3303

2. What to do in the event of a disclosure

If a child or vulnerable adult makes a disclosure to you, or if a third party discloses their concerns for a child or vulnerable adult, it is important that you: -

DO:

- Take everything that is said seriously.
- Remain calm and listen carefully.
- Reassure the person that they have done the right thing by disclosing.
- Make a detailed, contemporaneous written record of the conversation, including details of the date, time, place of the incident and what the child or vulnerable adult said and did, and the questions asked of them.
- Explain to the person what you will need to do next, including who you will need to tell.
- Allow time and a quiet space for support.
- If you have an immediate concern for a person's welfare and it is not possible to contact the university SLO (Safeguarding Lead Officer) or DSO (Deputy Safeguarding Officer) or, if you are working within an external organisation, the appointed safeguarding lead officer for that organisation, you should: -
 - If on campus, contact campus security on telephone number 0161 247 2222.
 - If in an environment with security provision (e.g., a hospital) contact the respective security.
 - Contact the police.
- Act in accordance with this procedure, complete the Incident Report Form(Appendix 2) and send this to the Safeguarding Lead Officer marked confidential.

DO NOT:

- Never ignore a disclosure
- At no time promise confidentiality. Instead, you should explain that you are worried about a risk of harm/abuse and would like the person's consent to talk to the SLO (Safeguarding Lead Officer) or DSO (Deputy Safeguarding Officer). If this consent is not given, you should inform the person that you have a duty to protect their wellbeing and safety and that of others and that you will have to talk with the SLO (Safeguarding Lead Officer) or DSO (Deputy Safeguarding Officer) for advice¹.
- Seek to investigate the report or make any judgements.
- Never ask the child or vulnerable adult if they are being abused.
- Never take photographs of any injury.
- Never record a child or vulnerable adult.
- Never physically undress a child or vulnerable adult to physically examine them.
- Never make any assumptions about what may have happened or elaborate beyond what was said in your notes.

¹ Art 6(1)c of the GDPR - legal obligation, Art 6(1)e of the GRPR - public task and Art 6(1)d of the GDPR – the processing is necessary to protect the vital interests of the data subject or another individual.

3. What is Regulated Activity?

A person will be engaging in regulated activity with children and vulnerable adults if as a result of their work, they:

- Will be responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children or vulnerable adults.
- Will be working on a regular basis in a specified establishment, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children or vulnerable adults.
- Engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

4. Safer Recruitment

The following legal requirements **will** be carried out, when appointing individuals to engage in regulated activity with children and / or vulnerable adults.

- i. Verify the candidate's identity.
- ii. Obtain (via the applicant) an Enhanced DBS check (including children's barred list information).
- iii. Obtain a separate children's barred list check if the individual will start work in regulated activity with children **before** the DBS is available².
- iv. Verify the successful candidates mental and physical fitness to carry out their responsibilities, e.g., a job applicant can be asked relevant questions about disability and health to establish their capacity to fulfil a specific role.
- v. Verify the person's right to work in the UK, including EU nationals. If the person has lived or worked outside the UK, further checks will be made as appropriate.
- vi. Verify professional qualifications, as appropriate.
- vii. Take reasonable steps to establish whether the candidate is subject to a prohibition order issued by the Secretary of State, before employing a person to carry out teaching work related to children or vulnerable adults.³

The University will also invoke its Recruitment and Selection policy in relation to Safer Recruitment. Current HR practice includes:

² In the event that DfE will permit access to the DfE portal.

³ The University rarely employs staff for the purposes of teaching work related to children and vulnerable adults.

Adverts

- The University will include the requirement of an Enhanced DBS check within relevant job description(s) and person specification(s).

Application

- Application for a job role at the University is via CV and covering letter (as appropriate). Job descriptions and person specifications outline whether an Enhanced DBS is required for the role.
- The University expects applicants to provide personal details, qualifications, date of award etc within their CV.
- Details of referees/references if not included on the applicants CV, are required for successful candidates, via the University's onboarding process).
- An explanation of personal qualities and experience relating to suitability of post should be contained within a covering letter alongside the candidates CV.
- Candidates are required to declare that the information they have provided in their CV is true when they submit their application.

Shortlisting

The University's Interview Panel Guidance requires at least 2 people to carry out the shortlisting exercise.

Successful Candidates

-
- Successful candidates are required to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children and / or vulnerable as part of the University's onboarding process.

Employment history and references

The University:

- Will request and obtain references, via secure e mail, for successful candidates.
- Requires that any references are from the candidate's current employer (and from a previous 3 yr. period).
- Reference request form requires a reason for the candidate leaving their current or most recent position
- Will ensure any concerns are resolved satisfactorily before appointment is confirmed.
- Will ensure the reference confirms whether they are satisfied with the candidate's suitability

Selection

The University use a range of selection techniques to identify the most suitable person for the post. Interviewers agree structured questions to find out what attracted the candidate(s) to the post; explore skills which are relevant to the role, and where relevant, probe any gaps in employment.

The chair of the panel may involve students in the recruitment process in a meaningful way and will record all information in decision making with decision made.

The interview process will also explore and determine the candidate's suitability to work with children and vulnerable adults, where appropriate.

5. What is the DBS (Disclosure and Barring Service) process for Under 18 yr. olds and vulnerable adults.

Under 18 yr. olds

Upon enrolment, the Head of Admissions will securely share timely and up to date under 18 yrs. enrolment data with the Inclusion and Disability Manager, Director of Student Services, Director of Curriculum Management, Assistant Director HR and Senior Compliance and Delivery Manager.

The Senior Compliance and Delivery Manager will liaise with the Director of Curriculum Management, Academic Heads of Department, Directors of Professional Services (where relevant), and Assistant Director of HR to ensure that staff have an appropriate DBS (Disclosure and Barring Service) check, where appropriate. The Senior Compliance and Delivery Manager will establish and maintain a Single Central Record for the purposes of FE and Skills Ofsted inspected provision.

The University will employ Enhanced (Children's barred) DBS chaperones for under 18 yrs. old students until they reach the age of 18 yrs., or until all relevant staff have the requisite Enhanced (Children's barred) DBS check.

Vulnerable adults

The Inclusion and Disability Service undertakes an assessment of those students that have a declared disability and will consider whether the student is deemed to be a vulnerable adult. Where the Inclusion and Disability service determines that the student is a vulnerable adult, they will inform the Head of Department and Senior Compliance and Delivery Manager to ensure that the necessary Enhanced DBS checks are put in place.

6. What checks must be obtained if I wish to employ a member of agency and third-party staff (supply staff)

In the event that agency staff are utilised for regulated activity the University will obtain written notification from an agency, or third-party organisation, that they have carried out the checks on an individual who will be working at the University that the University would otherwise perform.

The written notification will confirm that the certificate has been obtained by either the employment business or another such business.

In the event that the Enhanced DBS has disclosed any matter or information, the agency must send the University a copy of the certificate.

The Enhanced DBS certificate with children's barred list information, will be obtained prior to appointment of the individual by the University.

The University may also check that the person presenting themselves for work is the same person on whom checks have been made.

7. Outreach Activities and Projects

When visiting a school or college, staff and representatives of the university should familiarise themselves with the organisations safeguarding policies and procedures and the point of contact for raising any safeguarding concerns within the setting.

University staff and representatives are not expected to take responsibility for students in other educational settings. University staff and representatives should avoid situations where they may be left alone with students from other educational settings.

Activity that sits outside regular teaching and learning programmes which involve children, young people and vulnerable adults should be risk assessed. This process seeks to anticipate and mitigate risks. Guidance on the completion of a risk assessment can be found [here](#). A risk assessment template is provided in Appendix 3.

When completing the risk assessment specific consideration should be given to the particular issues associated with children and vulnerable adults. This might include, for example, the following considerations: -

- Are any physical activities planned and do these present particular risks for children and/or vulnerable adults? What parental/carers permissions are required?
- Is the location/venue suitable for children, and / or vulnerable adults? It may have been risk assessed for adult provision but does this original assessment consider the needs of different user profiles? For example, access to a kitchen may not require controls when in use by adults but open access may be a risk for children, young people, or vulnerable adults.

- Is the activity likely to involve staff in 1 to 1 sessions with the children and / or vulnerable adults, and if so, can this be avoided? If not can controls be put in place to ensure both parties feel comfortable, for example meeting in a room with windows or leaving a door open? Have the appropriate DBS checks been completed?
- Are procedures in place, and are sufficient staff available, so that a response can be made to a health concern or injury of one person, while at the same time maintaining appropriate levels of staffing at the event? Have dietary requirements been confirmed? Have emergency contact details been gathered for parents/carers?
- Are procedures in place to respond to somebody becoming distressed and/or agitated during the event?
- Guidance for safeguarding preparation for a university led event is provided in Appendix 3.

8. International Students, and Students Engaging in University Related Activity Overseas

The university welcomes international students who study on campus and/or online from overseas. The university provides a wide range of support services to meet the needs of these students.

The university also offers a wide range of opportunities for students to engage in an internationalised experience, including, for example, work or study abroad and cultural exchange visits.

Where a student is studying or engaging in university related activity overseas and a safeguarding concern arises, this must be reported to the SLO (Safeguarding Lead Officer) or DLO immediately.

The SLO (Safeguarding Lead Officer) or the DSO (Deputy Safeguarding Officer) will coordinate a response appropriate to the nature of the concern(s) raised, which may include convening a group to assess the risk of harm to the student. This group will be chaired by the SLO (Safeguarding Lead Officer) or DSO (Deputy Safeguarding Officer) and will include the Academic Registrar, Head of Counselling, Mental Health and Wellbeing, the Programme Lead, International Office, and Legal Services. Other members will be invited as required.

9. What to do if a safeguarding concern arises out of hours

If a concern arises out of normal working hours that cannot wait until the resumption of normal working hours, then the safety of the student must be prioritised. Please contact the SLO (Safeguarding Lead Officer) on telephone number 07920 082902, or, if on campus, please contact security on telephone number 0161 247 2222.

If the SLO or security are unavailable please call the local police force on 999. The police will be able to provide you with the number for out of hours support.

Any case dealt with in this manner should also be reported to the SLO via e mail at j.clough@mmu.ac.uk, with the information about who was informed, crime reference number and action that was taken by the police or local authority. The SLO will then set up a case management meeting when normal hours have resumed.

10. Inappropriate images: what to do if an incident comes to your attention.

Never view, copy, print, share, store or save the imagery yourself, or ask a child or vulnerable adult to share or download – **this is illegal.**

If you have already viewed the imagery by accident (e.g., if a child has showed it to you before you could ask them not to), report this to the SLO or DSO (Deputy Safeguarding Officer) and seek support.

Do not delete the imagery or ask the child or vulnerable adult to delete it.

Do not ask the child/children or vulnerable adult who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the SLO or DSO.

Do not share information about the incident with other members of staff, the child or vulnerable adult it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any child or vulnerable adult involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

11: Safeguarding for Initial Teacher Education

Students should be aware of the above and of the following resources:

MMU Safeguarding Policy

Partnership school safeguarding policy

Department for Education [Prevent Duty](#)

Department for Education [Promoting fundamental British values](#).

Trainees should be aware of key contacts

MMU Faculty of Education Mental Health and Wellbeing Lead

MMU Initial Teacher Training provision has regard to the [Keeping Children Safe in Education statutory guidance](#) and requires that all trainees access and engage with this document. All trainees are subject to appropriate pre-selection checks, which includes obtaining and considering [Disclosure and Barring Service \(DBS\)](#) criminal records checks and children's barred list information.

The University confirm in writing to schools that a non-salaried trainee's criminal record check, including a check of the children's barred list, has been completed and that the individual has been judged by the provider to be suitable to work with children. We are not required to provide any information to schools in addition to this confirmation. Schools may wish to record this confirmation in their single central record, but they are not required to do so.

Where a school or college allows an individual to start work in regulated activity before the DBS certificate is available, the school should ensure the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed.

In the case of salaried routes, the responsibility lies with the employer to ensure that checks have been carried out. The employing school should inform the provider that a satisfactory check has been obtained.

We establish clear safeguarding procedures and protocols that are agreed by all partners in the partnership. This includes a collective understanding across the partnership of convictions, offences, cautions and warnings that would not pose a barrier to joining an Initial Teacher Training programme.

Schools should ensure that all trainee teachers, at the start of their training in each school, are provided with the following:

- the child protection policy
- the staff behaviour policy (sometimes called a code of conduct)
- information about the role of the designated safeguarding lead
- a copy of Keeping Children Safe in Education

Applicants/students can access the DBS Update Service, an online subscription that allows the certificate up to be updated and allows employers to check a certificate online.

Applicants for DBS can join the update service [here](#), as soon as they receive their application form reference number.

If the University removes a trainee from a programme because the trainee has harmed or poses a risk of harm to children, or if the University would have removed the trainee had they not left, the provider should seek guidance from the DBS.

Any queries about DBS checks should be referred to the DBS by email to customerservices@dbs.gsi.gov.uk or phone on 03000 200 190.

Other background checks

Candidates who are unsuited to working with children may not have any previous convictions, and providers should be vigilant during the selection process. Both Manchester Metropolitan University and employing schools have a duty to ensure that trainees are effectively managed and supervised and that, if they have concerns, information is referred to the police and the DBS.

Candidates who have lived or worked outside the UK must undergo the same checks as all other staff in schools and colleges. In addition, further checks should be carried out so that events that occurred outside the UK can be considered. The Home Office has published guidance on [criminal record checks for overseas applicants](#).

Both the University and employers must check that candidates are not:

- subject to a prohibition order issued by the Secretary of State
- prohibited to teach in another country of the European Economic Area (EEA)

The lists of prohibited teachers are on the [Teacher Services System](#).

Childcare disqualification

We should have regard to the [Disqualification under the Childcare Act 2006 statutory guidance](#) and related obligations under the Childcare Act 2006 when carrying out their duties to safeguard and promote the welfare of children.

Where trainees are salaried, it is the responsibility of the school to ensure they comply with the legislation. If a salaried trainee is, or becomes, disqualified from a childcare role, schools should inform the training provider of this. Where trainees are fee-funded, it is the responsibility of the training provider to ensure that the trainee is not disqualified from childcare or that the trainee has obtained a childcare disqualification waiver from Ofsted.

Further advice on the childcare disqualification arrangements can be obtained from the Department for Education at disqualification@education.gov.uk or on 01325 340 409.

Further information statutory guidance

- [Regulated Activity \(children\) - supervision of activity with children which is regulated activity when unsupervised](#)

- [Working together to safeguard children](#)
- [Keeping children safe in education](#)

12. Appendix 1 - Risk Assessment template

Risk Assessment Template: High, Medium, Low

Assessment Ref No:	Assessed By:	Validated By:	Date of Assessment:	Review Date:
Location:		Activity:		
Overall Assessment of the Risk of Injury or Ill Health after Control Measures have been Implemented:			<input type="checkbox"/> LOW	<input type="checkbox"/> MEDIUM <input type="checkbox"/> HIGH
Other Risk Assessments Related to this Activity:				

What are the hazards?	Who might be harmed and how?	What are you already doing to control the risk?	Risk	Is any further action needed?
Slips and trips	Staff and visitors may be injured if they trip over objects or slip-on spillages	<ul style="list-style-type: none"> • General good housekeeping. • All areas well lit, including stairs. • No trailing cables or leads. • Staff keep work area clear e.g., no boxes left in walkways, deliveries stored immediately 	Low	<ul style="list-style-type: none"> • Improve housekeeping in kitchen around floor spills.

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Severity of the Consequence				
Likelihood of incident occurring	RISK ESTIMATOR Assess the likelihood of the incident and the severity of the consequence	LOW RISK Slightly harmful	MEDIUM RISK Moderately harmful	HIGH RISK Extremely harmful
	LOW RISK POTENTIAL Unlikely	LOW RISK Trivial	LOW RISK Acceptable	MEDIUM RISK Moderate
	MEDIUM RISK POTENTIAL Likely/possible	LOW RISK Acceptable	MEDIUM RISK Moderate	HIGH RISK Substantial
	HIGH RISK POTENTIAL More likely/near certain	MEDIUM RISK Moderate	HIGH RISK Substantial	HIGH RISK Intolerable

Risk Rating	Action Required to Control the Risk
LOW	No further action but ensure controls are maintained and reviewed
MEDIUM	Look to improve at next review or in specified timescale, of if there is a significant change
HIGH	Stop the activity and take immediate action to maintain existing controls rigorously

13. Appendix 2 - Incident Report Form

DETAILS OF INCIDENT

Date & time of incident:	
Where the incident occurred:	
Briefly describe the circumstances of the incident (including the names of any parties involved):	

DETAILS OF INJURED PARTY

Full name of injured party:	
Parent/guardian name & contact number:	
Address:	
Home telephone number:	
Mobile telephone number:	
Sex (please circle):	Male Female
Date of birth:	
Nature of injury/ abuse:	

Comments or explanation given by injured/abused party:	
Name & contact details of any witnesses:	
Initial action taken:	

DETAILS OF PERSON COMPLETING REPORT

Name & contact details:	
Signature:	
Date:	

14. Appendix 3 - Guidance for Safeguarding preparation for a University led event

