

# Safeguarding Policy

---

**January 2024**

**Version 2**

Originally created in March 2020 and approved by:

HRSC (a Sub Committee of the Trustee Board)

On: 3<sup>rd</sup>. April 2020

### Contents page

		<b>Page No</b>
(i)	WSU Safeguarding Policy Statement	3
(ii)	Scope and Purpose of the Policy	3
(iii)	The Policy and Safeguarding Standards	5
	• Conduct	5
	• Personal Data	6
	• Recruitment, Induction and Training	6
	• Work Experience	7
	• Under 18s	7
	• Photography and video consent	8
	• Whistleblowing	9
	• Extremism	9
	• WSU Safeguarding Lead	9
(iv)	Appendix 1: Guidance for staff on dealing with safeguarding concerns	10
(v)	Appendix 2: Safeguarding concern report form	12

## **WSU Safeguarding Policy Statement**

It is the policy of Worcester Students' Union (WSU), as a registered charity, to make every effort to operate a safe and supportive environment for its members (students), staff, trustees, volunteers, and visitors.

As outlined in its Equality, Diversity, and Inclusion Policy, Worcester Student's Union (WSU), is committed to equality of opportunity and to promoting a positive and inclusive culture, in which everyone is treated with dignity and respect. This applies to our roles as an employer, a representative and campaigning body, and as a service provider.

WSU has a duty to consider the needs of all of our members in determining our charitable activities and strategic direction. We will take a proactive and inclusive approach to equality, we rightly value diversity, and we support and encourage all under-represented groups at the University and beyond.

WSU recognises that its work and activities may, at times, include the involvement of children and young people under the age of 18, or adults who may be more vulnerable due to disability or mental ill health, or at risk of prejudice or abuse (including racist, religious, sexual, sexist, homophobic or transphobic).

WSU is committed to working with the University of Worcester (UoW) and external services to ensure it makes safeguarding a priority in the delivery of its services and activities, is accessible to its members, and has a positive influence on their lives.

### **Scope and Purpose of the Policy**

1. This Policy applies to all staff, trustees, volunteers, members (including Associate and Honorary members), and visitors of Worcester Students' Union. It will be reviewed annually, in line with the review of the organisation's Risk Register.
2. Safeguarding practices are most commonly applied to children and young people under the age of 18, and vulnerable adults as set out in national legislation and statutory guidance. These groups have additional rights to protection from harm.
3. There are various reasons why a person over the age of 18 is deemed in statute to be a vulnerable adult, including (but not limited to) they are resident in a care home, they are receiving care in their home, they are receiving payments from their local authority in lieu of social care, they have a permanent or temporary dependence on others and require assistance in the conduct of their affairs, they have a reduced ability to protect themselves from harm, abuse or neglect, they are receiving a service for a prescribed physical or mental illness.
4. There are several pieces of legislation which set out obligations and duties of care on organisations working with children, young people, and adults at risk. These include (amongst others):

- Sexual Offences Act 2003
  - Children's Act 1989 and 2004
  - Safeguarding Vulnerable Groups Act 2006
  - Protection of Freedoms Act 2012
  - Care Act 2014
  - Counter Terrorism and Security Act 2015
  - Care and Support Statutory Guidance 2018
  - Working Together to Safeguard Children 2018
5. WSU enjoys a diverse student membership and it is the case that within that membership, there will be individuals who may be more susceptible to harm and abuse than others. WSU recognises that there are factors that may increase an individual's risk of being harmed or abused. These include (but are not limited to):
- Prejudice, discrimination and stereotyping
  - Mental or physical health issues
  - Disability
  - Those exploring their sexual and/or gender identity
  - Disadvantage that may result in vulnerable self-presentation
  - Isolation
  - Past or current experiences or trauma
6. WSU recognises that there are various forms of abuse that may affect its members or representatives at any time. These include (but are not limited to) physical, emotional, domestic, sexual, financial or material abuse, neglect, forced marriage, modern slavery, and female genital mutilation (FGM).
7. WSU is mindful of the fact that the University may admit students, in line with their Admissions Policy, who are under the age of 18. WSU will ensure that these students are taken into consideration in the delivery of its services and activities.
8. WSU will support its staff and volunteers to understand their roles and responsibilities with regards to safeguarding and protecting young people and adults at risk, including the responsibility to report all concerns without delay. Staff and volunteers have a responsibility to ask their line manager or supervisor if they are unsure about any aspect of their responsibilities in this regard.
9. Confidentiality will be appropriately maintained. The individual's safety and welfare will be the over-riding consideration when making decisions on whether to breach confidentiality and share information about them with others.
10. This policy should be read in conjunction with:
- University of Worcester Policy for Safeguarding Children and Vulnerable Adults ([UoW Safeguarding Children and Vulnerable Adults](#) );
  - WSU Data Protection and Information Security Policy ([WSU Data protection and Information Security Policy](#));
  - University of Worcester and Worcester Students' Union Data Sharing Policy ([UoW](#)

- [and WSU Data Sharing Policy](#));
- WSU Bye Laws (in particular, those related to conduct and disciplinaries; [WSU Bye Laws WSU Website](#));
  - WSU Whistleblowing Policy ([WSU Whistleblowing Policy](#));
  - The University's Student Code of Conduct and Disciplinary Procedures ([Student Disciplinary Procedures](#));
  - For WSU employees, the Staff/ Officer Employee Handbook;
  - WSU Health and Safety Policy;
  - University of Worcester Health and Safety Policy
  - Code of Practice on Freedom of Speech (agreed between the University of Worcester and WSU)([Code of practice on Freedom of Speech](#));
  - WSU Equality, Diversity and Inclusion policy ([EDI policy](#));
  - WSU Lone working guidelines part of H&S policy
11. It may, on occasion and depending on the circumstances, be appropriate for WSU to defer directly to the University's Policy for Safeguarding Children and Young People, if, for example, there was a serious safeguarding concern about a student at the University.

## **The Policy and Safeguarding Standards**

### **Conduct**

12. Staff, trustees, elected officers and Reps, volunteers (all of whom are WSU representatives), and members of WSU are expected to abide by the standards of conduct as laid out in the Staff/ Officer Employee Handbook (for staff) and in WSU's Bye Laws (for members, volunteers, elected officers and Reps). WSU wishes to ensure that representatives of WSU and participants in its services, events, and activities understand what constitutes appropriate and reasonable behaviour.
13. Any breaches of these standards of conduct will lead to appropriate sanctions and could lead to disciplinary proceedings against the individual responsible. Where necessary and appropriate, it will lead to the individual being referred to the University or Police for investigation.
14. WSU representatives and members are expected to treat others with respect, professionalism, and courtesy, having regard to the principles of equality and inclusivity. They should never engage in activities which might amount to discrimination or harassment. The same is expected of those who visit WSU and its premises or who may be carrying out contractual work on behalf of the University or WSU.
15. WSU representatives and members should never use their positions to exploit others or abuse their trust.
16. WSU representatives and members should not behave in a way that could be regarded as bringing themselves or WSU into disrepute or opening WSU up to

legal liability.

17. WSU staff and Full Time Officers must have regard to WSU's Alcohol and Drugs Policy, contained within the Staff/Officer Employee Handbook.
18. WSU representatives and members will abide by the Health and Safety Policies of WSU and the University when organising and participating in events and activities, to help mitigate the risk of accident, injury or harm to anyone.
19. As part of its Health and Safety Policy, WSU has Lone Working procedures, with which it expects its staff to comply when engaged in such activities.
20. In the case of the Academic and Welfare Advisor holding appointments with members, if there are any concerns about the member's vulnerability, such as they are under 18 or an adult at risk, they will have another member of WSU staff present at the appointment.

### **Personal Data**

21. All personal data will be processed in accordance with WSU's WSU Data Protection and Information Security Policy and the University of Worcester and Worcester Students' Union Data Sharing Policy.

### **Recruitment, induction and training**

22. WSU requests information on criminal convictions as part of its recruitment processes.
23. Applicants for staff and trustee positions are treated fairly during the recruitment process and personal details of applications are removed during the selection process. Only factors related to the job to be filled will be considered and WSU takes no account of a person's protected characteristics during the selection process. Candidates are invited to complete a confidential diversity monitoring form as part of the application process. This form is removed prior to any shortlisting or decision-making process.
24. All WSU staff are required to complete mandatory Equality and Diversity training as part of their induction.
25. All WSU are required to complete a medical condition form when they join the organisation in order that they can be better helped in an emergency. These are stored securely and confidentially in line with GDPR requirements.
26. WSU staff will undertake periodic training in relation to equality, diversity and safeguarding matters.
27. WSU provides its staff with guidance on what to do in circumstances where one of its representatives or members has a safeguarding concern about another individual (see guidance and appendices attached to this policy).

## Work Experience

28. WSU recognises that it offers an environment that could give young people a good experience in the world of work. Prior to any arrangement being agreed, WSU must ensure that the organising party responsible for the young person (i) carries out a specific risk assessment for the activity and (ii) details any reason why the proposed WSU supervisor would need to undergo an appropriate Disclosure and Barring Service (DBS) check. Please note a DBS check will not automatically be necessary.

## Under '18s

29. WSU representatives are expected to take reasonable steps to determine whether the people they are working with or who are participating in a WSU event or activity (on or off campus) are under the age of 18 or have additional needs for support and protection.
30. If WSU representatives or members are engaged in projects or activities, such as volunteering, that involve contact with children, young people or vulnerable adults, appropriate steps will be taken to ensure necessary Disclosure and Barring Service (DBS) checks are conducted.
31. WSU representatives should take steps to avoid any unsupervised contact with anyone under the age of 18, as part of their duties. Any meetings with someone under the age of 18 should take place in the presence of at least one other WSU representative or responsible adult. If this is genuinely not possible, due to the circumstances, any meeting should be in an open environment.
32. If events take place within the Students' Union, for example, in The Hangar, that involve the participation of under '18s, the organising party will be responsible for ensuring appropriate supervision of the children/young people present. Any concerns around this or the conduct of the participants will be raised by WSU duty management with the organising party. WSU management reserve the right to stop or cancel an event if they feel that the safety of participants is compromised or at risk.
33. WSU recognises that there may be occasions where members may bring children with them onto campus, for example, attending an appointment with the Advice and Support Service. In such situations, children must remain under the safe supervision of their parent/guardian/carer at all times.
34. WSU representatives should not engage in sexual relationships or sexual activities with under 18s they meet in the course of their duties, due to the potential abuse of their position of power and influence. It is a sexual offence under the Sexual Offences Act 2003 for an adult to engage in sexual activity with a person under the age of 18 (even if the person is of the legal age of consent) where the adult is deemed to be in a position of trust. Where there are concerns related to abuse of power related to an individual's role and responsibility, irrespective of the age of the alleged victim, disciplinary action will be considered.

35. WSU representatives (whether they are employees of WSU or not) should never give an under 18 their home address, personal telephone or mobile number, personal email address, or social networking details.
36. WSU recommends that its representatives (staff and students) and members take steps to ensure they do not accidentally put themselves in a position where an allegation can be made against them.
37. WSU is committed to responding swiftly to any allegations of abuse or harm by its representatives and will invoke its disciplinary or complaints process as appropriate.
38. WSU takes allegations that are found to be clearly vexatious or frivolous very seriously and will deem them a disciplinary – and potentially criminal – matter.

### **Photography and video consent**

39. WSU celebrates the achievements of its members and representatives and is obliged to promote its activities and opportunities to all members. As such, there will be times when photographs and videos are taken. WSU recognises the individuals' right to privacy, however, and so will:
  - Publicise at large events when photos and video footage are being taken and the procedures for individuals to inform staff if they do not wish their image to be captured;
  - Obtain the express permission of individuals that they are happy for their images to be taken when the image in question identifies the individual personally;
  - If the individual is under 18, obtain the express permission of their parent/guardian/carer. If this is not possible for whatever reason, no image will be taken;
  - When obtaining consent, WSU will inform the individual the context and purpose of the image and how and where it will be used.

### **Whistleblowing**

40. The Public Interest Disclosure Act 1998 introduced protection for workers and employees from reprisals for disclosing information deemed to be in the public interest. The Act emphasises the role 'whistleblowing' can play in deterring and detecting serious malpractice such as fraud and the abuse of children, young people, and vulnerable adults.
41. WSU has a specific policy and procedure for Whistleblowing that it will make available to staff and to students via the website.
42. Please note that this is very different to making a complaint, for which WSU has processes for members and employees.

### **Extremism**

43. WSU and the UoW have jointly developed a Code of Practice on Freedom of Speech to ensure due diligence around external speakers.



44. WSU co-operates with the University on the University's legal duty in terms of countering terrorism.

### **WSU Safeguarding Lead**

45. The Chief Executive of WSU is the Safeguarding Lead. They will co-ordinate the investigation of any concerns or allegations about members and WSU representatives. In doing so, they may liaise with senior, relevant staff at the University at their discretion and using their professional judgement.

46. The Chief Executive may, if necessary and appropriate, delegate action and responsibilities to other members of WSU Senior Management Team in dealing with an incident or concern, for example, if they are absent.

47. The Chief Executive will ensure the reporting of any safeguarding incidents or issues to the Trustee Board, as part of the annual review of the organisation's Risk Register (or earlier if required).

## Appendix 1

### **Guidance for staff on dealing with safeguarding concerns**

- If you have safeguarding concerns about a fellow member of staff or about a student member, you need to inform your line manager or the SU's HR & Finance Administrator. You will never be criticised for doing so and must never deal with this sort of concern alone.
- They will discuss the concerns with you in the first instance and make a confidential record of your concerns. They may then either refer to the matter to the University and their Safeguarding processes (and inform the Chief Executive of the Students' Union) or escalate the matter to the Chief Executive of the Union who will take it forward.
- NB Reporting concerns about a person's safety may not be the same as referring a safeguarding concern, especially if they would not normally be considered 'vulnerable' (please see the Scope and Purpose section of the Safeguarding Policy above). It may be more appropriate to contact University Security in these instances. In all instances, please ask your line manager or a senior member of WSU if you are unsure what to do.
- If you are dealing with students who are distressed or disclosing something to you either face-to-face or over the phone:
  - try and remain calm. Reassure them that they're doing the right thing;
  - try and establish the student's name, student number;
  - try and note the phone number if they are calling you;
  - try and establish their current location if they are on the phone;
  - once you feel it is appropriate, tell the caller that you are going to end the call so you can try and get them some help and ask them to stay where they are if it is safe for them to do so;
  - Contact University security or if this is not possible and you feel it is an emergency, call 999. You will never be criticised for doing so;
  - If you are with the student in person, ensure that you are not accidentally putting yourself in a position where allegations can be made – seek assistance from a colleague and don't be alone with them. It is advised to contact Campus Security as soon as you're able;
  - Take the disclosure seriously to reassure the person that you are listening;
  - Don't promise to keep things secret and explain the circumstances in which you will be obliged to breach confidentiality;
  - Retain evidence. For example, in the case of an alleged assault, do not allow the student to wash;
  - Do not persist in asking for details they are reluctant to give;
  - Don't make assumptions about what you are being told, especially if details are missing or the person only partly discloses something. This is especially important if you have to relay details to someone else. Only relay what you have been told by the person;
  - At the end of the conversation, explain to the person what you need to do next (see following points);

- Inform the duty management of the SU as soon as possible and the Chief Executive of the SU.
- NB Whether or not you have any doubts about the validity of the disclosure the person has made is irrelevant and should NEVER be a factor in following it up – you should always inform duty management and the Chief Executive;
- Complete a 'Safeguarding concern report form' and send to the Chief Executive via email as soon as you can after the incident;
- Be totally factual when you are completing the report form – detail what the person said and how they seemed or acted but do NOT offer any personal opinion on the person or what may have happened. Bear in mind that documents such as this may later be used as evidence in subsequent court proceedings.
- If a student gets abusive, again try and remain calm. Tell them you are seeking assistance from a colleague and contact University security;
- If a student is persistently abusive during a phone call and does not refrain when asked, inform them that you are terminating the call. Make a note of the details of the call and inform your line manager (or a senior manager if your line manager is not available).

Appendix 2  
**Safeguarding concern report form**
**Details of employee/WSU representative raising concern:**

<b>Name</b>	
<b>Job Title</b>	
<b>Date</b>	
<b>Time</b>	
<b>Incident reported to</b>	

**Details of individual of concern:**

<b>Name</b>	
<b>Address</b>	
<b>Mobile No.</b>	
<b>Date of birth</b>	
<b>Student number (if applicable)</b>	
<b>Emergency contact (if given)</b> <i>Name/relationship to individual</i>	
<b>Date and time of disclosure</b>	
<b>Did they require medical attention?</b>	Yes/No
<b>Details of the concern / disclosure / any alleged perpetrator</b>	
<b>Others present or potential witnesses</b>	

<b>Action taken (and by whom)</b>	
<b>Date and time</b>	
<b>Signed</b>	

Date Policy Approved	03/04/2020
Approval Authority	WSU HR & Remuneration Committee (a Sub Committee of the Trustee Board)
Date of Commencement	April 2020
Amendment dates	11 <sup>th</sup> March 2021
Review dates	30 <sup>th</sup> November 2021 30 <sup>th</sup> November 2022 (by the Full Trustee Board, in conjunction with the Risk Register)
Date for Next Review	January 2025
Related WSU Policies, Procedures, Guidance, Forms or Templates	Whistleblowing Policy Staff/Officer Handbook Equality, Diversity and Inclusion (EDI) Policy Health and Safety Policy