



# Safeguarding Policy

## Policy Statement

The University is committed to protecting and safeguarding the welfare of children and adults at risk and safeguard those vulnerable to being drawn into extremism, in line with its legal obligations. These obligations extend to all who access our services, grounds or facilities and participate in our activities, to include staff, students, contractors, and volunteers/visitors, as well as individuals who engage with the University through research and innovation activities. This is regardless of whether they take part in-situ or virtually through online communication systems.

The University acknowledges in particular its responsibility to safeguard children under the age of 18 and adults at risk at any time when they are engaging in University-run activities regardless of location, both in the UK and internationally, to ensure they are protected from abuse.

For the purpose of this policy, a child is defined as a person under the age of 18. This policy considers an adult at risk to be someone aged 18 years or over; who 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 is at risk of significant harm or exploitation.

Safeguarding is everyone's responsibility, and all individuals play a role in preventing, reporting and responding to allegations of exploitation, abuse or harm, in particular those staff who teach, support, guide or in any way interact with students. It is incumbent on all staff to be aware of their responsibilities and act accordingly at all times.

When children of staff, students or visitors are present on the University campus, they remain the responsibility of their parent/carer, unless engaged in official activities.

Appropriate safeguarding awareness training is available for all to ensure that there is awareness of their safeguarding responsibility. Staff and students who engage with children or adults at risk as part of their day to day role, including through research and innovation must complete mandatory training and refresher training.

The University has various relevant policies and guidance pages that ensure the appropriate arrangements are in place to enable the University to provide a safe and secure environment to prevent abuse, and to respond appropriately to suspected or reported abuse of under-18s or adults at risk. In addition to this policy, some of the relevant policies and guidance pages that support the University's commitment to safeguarding are:

- [Handling of Disclosure and Barring Service Certificate Information](#)
- [University Pre-School practices](#)
- [University Health and Safety Policy and Risk Assessments](#)
- [Work Experience Placements](#) (and associated Risk assessments)
- [Prevent Duty/Worried about a Student/Friend](#)
- [Prevent Duty/Worried about a staff member](#)
- [Student Wellbeing and Disability Support](#)
- [Student Loss of Contact Policy](#)
- [Senate Handbook on Student Welfare](#)

- [Wellbeing at Work](#)
- [Employee Assistance Programme](#)
- [Counselling Services for students](#)
- [Dignity at Work Advisors](#)
- [Dignity at Work Policy](#)
- [Recruitment of ex-offenders Policy](#)
- [Research Ethics Policy](#)
- [Research Integrity Policy](#)
- [Research Passports](#) (working with NHS)
- [Safeguarding CUTE module \(via CUTE Training Library\)](#)
- [Social Media Policy](#)
- [Whistleblowing Policy](#)
- [Data Protection – Audio and Video Recording Guidelines](#)
- [Code of Professional Conduct](#)
- Risk assessments related to Take your Child to Work Day
- Agreement between Campus Services/Accommodation and Apprentice training provider

The University Pre-School (CU) and on-campus nursery (Cherry Trees Workplace Nursery run by Childbase) have separate Safeguarding Policies and Procedures.

## **Responsibilities of those working closely with Children and/or Adults at Risk**

All staff required to work with children or adults at risk should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

The University will ensure that where an individual is required by the University to work directly with children under the age of 18 and/or adults at risk on a regular, unsupervised basis, (which might include regular processing of information) shall be subject to satisfactory checking of relevant criminal convictions undertaken by the Disclosure and Barring Service (DBS), subject to their role falling within the eligibility criteria. DBS checks are undertaken by a third-party supplier.

The University will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children and adults at risk. Where a role requires an individual to undergo a DBS check, this will be highlighted during the recruitment process and the check undertaken as required, prior to engagement or where this is not feasible, during the induction period (in such circumstances, the individual will be supervised/highly restricted in terms of activities they are able to undertake in relation to children and adults at risk).

Before any new or changed programme, event, visit or any other activity involving children or adults at risk, or before employing an under-18, a risk assessment should be completed. Where a risk assessment has identified that individuals are likely to have regular contact with or encounter children or adults at risk (which might include regular processing of information), appropriate checks into their eligibility will be required. Such processes will be compliant with the University's Equality and Diversity policy. Should a risk assessment identify that a DBS check is required, the local HR team must be contacted in the first instance to instigate the appropriate check.

Any individual working closely (e.g. in a line management or supervisory position) with children and/or adults at risk will be asked to complete the online Safeguarding training module ideally prior to the commencement of the work in question. They will also be responsible for ensuring that an appropriate risk assessment is in place.

The University has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

In implementing this Policy and in appropriate circumstances, the University will engage proactively with statutory local authority boards and organisations, including the Local Authority Designated Officer (LADO) and, when necessary and appropriate to do so, follow their published guidelines, policies and procedures.

### **Work experience and apprenticeship placements for those who are under 18**

The University, in accordance with guidance from the [Health and Safety Executive](#), aims to safeguard children throughout the duration of their work experience/placement at the University. Although the placement may not meet the definition of regulated activity (as set out in Safeguarding Vulnerable Groups Act 2006), the University has a duty of care to safeguard those on work placement whilst they are participating in a University-related activity.

Those working at the University are in a position of trust. In accordance with the Sexual Offences Act 2003, it is a criminal offence for any adult who is in a position of trust to engage in, incite, or promote sexual activity with a child even if the relationship is consensual. This includes children who are aged 16 or 17.

The University provides services and activities for, and engages in academic research with, children through initiatives such as outreach activities. Those who participate in any activity with a child on behalf of the University, regardless of whether they are on or off campus, are in a position of trust. They must uphold this Policy and where relevant, ensure that they are familiar with the safeguarding policy and procedures of participating schools or educational partners.

### **Prevention of harm in research and innovation**

UK Research and Innovation (UKRI) policy on [Preventing harm \(safeguarding\) in research and innovation](#) applies to all research funded by UKRI regardless of whether it takes place in the UK or overseas. UKRI believes that everyone has a right to be treated fairly and with dignity and respect. UKRI promotes safe research environments which are free from “sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence” for all individuals that are employed on, participate in or otherwise come into contact with the research and innovation activities they fund.

When undertaking any research and innovation, the following considerations should be considered in the context of safeguarding:

- The ethical conduct of research to ensure that no harm comes to research participants or communities as a result of their involvement in a research project. All staff and students undertaking research as part of their studies or under contract must seek ethical approval prior to data collection.
- The health and safety of researchers and associated personnel involved in research projects, in particular when undertaking field work in developing countries or in challenging contexts.
- The conduct of researchers, associated personnel or visitors involved in research projects towards research participants, the broader community with whom they engage while conducting field studies and/or other members of the research team.
- Adhere to safeguarding legislation, in particular [child protection legislation](#) and the [Modern Slavery Act 2015](#).

Many of our funding bodies set out expectations for individuals and organisations involved in funded research, these include:

- Being aware of relevant policies and procedures and knowing how to respond to and report concerns through the appropriate channels in the organisation;
- Protecting the rights of all individuals involved;
- Informing the funding body if there is a safeguarding breach relating to a funded project;
- Informing the funding body if an allegation is upheld;
- Concluding investigations, even if the subject of the investigation resigns during the process.

Sanctions may be made against an individual or organisation if either have failed to comply with the funding bodies Safeguarding Policy. Sanctions that may be applied include:

- Restricting applications for specific grant types e.g. doctoral training programmes, overseas based research;
- Not accepting any new grant applications for a limited period of time;
- Suspending grants for a limited period of time.

## **Photography, Social Media and Audio and Video technologies**

Thought should be given to the duty of care when publishing photographs, video images, comments and personal data on the web, including on all social media sites.

In accordance with the Data Protection Act 2018, photographs, audio and video are personal data and should be treated accordingly. Where photographs/recordings are taken, participants should be informed of their rights and made aware when recording is taking place. In certain circumstances, individuals may opt out before a recording takes place.

Where photography or recording is not directed at any one individual, consideration should be given to safeguarding and treated with the same care as that of any one person.

Considerations relating to safeguarding are as applicable to processing data for social media as they are to any other form of interaction between those who are in a position of trust, and those within their care, or who are deemed at risk.

## **Reporting an Incident/Disclosure/Concern relating to the safeguarding of children or adults at risk**

The University has in place a Safeguarding Lead (SL) and three Deputy Safeguarding Leads who are responsible for coordinating the response to safeguarding concerns within the University.

All staff have a responsibility to respond if a safeguarding disclosure, allegation and/or cause for concern has been brought to their attention. In the first instance, the matter should be raised as soon as possible with either their line manager, local HR Team and/or the Deputy Safeguarding Lead(s). A form for reporting such concerns (safeguarding incident reporting form) can be found at Appendix 2.

Information on how to contact these nominated individuals is published below.

Where an allegation, disclosure or cause for concern is raised, the Safeguarding Lead/Deputy Safeguarding Lead initiates the University's safeguarding procedures in accordance with a process agreed and reviewed by the Safeguarding Standing Group. Appendix 1 provides an overview of the escalation process, including where cases may be referred to external agencies.

For general inquiries or to report a safeguarding incident, disclosure or concern about a student, please email [studentsupport@cranfield.ac.uk](mailto:studentsupport@cranfield.ac.uk)

For general inquiries or to report a safeguarding incident, disclosure or concern about a member of staff, please email [hr@cranfield.ac.uk](mailto:hr@cranfield.ac.uk)

For general inquiries or to report a safeguarding incident, disclosure or concern about funded research or innovation relating to individuals directly involved in the research, including participants, staff, students and any associated individuals directly or indirectly involved in the activity, please email [researchoffice@cranfield.ac.uk](mailto:researchoffice@cranfield.ac.uk)

For immediate advice and support out of hours, please contact Security on ext. 2222 (or 01234 752999 from a mobile for Cranfield Campus; 01793 785222 from a mobile for Shrivenham Campus) noting that if any child or adult is perceived to be at serious risk of immediate harm, the relevant emergency service should be contacted.

## Safeguarding Standing Group

The University has a Safeguarding Standing Group. The role of the Standing Group is to:

- Provide guidance and support relating to safeguarding individuals;
- Consider the needs, views and best interests of those considered to be at risk;
- Ensure individuals working with children and/or adults at risk in relevant situations meet their responsibilities and ensure all appropriate checks are made;
- Promote safeguarding good practice throughout the University;
- Ensure appropriate training packages are in place for the University and appropriate mandatory and refresher training is undertaken;
- Review feedback from the Safeguarding Forum which meets to discuss cases on a confidential basis, identifies lessons learned and follow-up actions, and monitor case numbers.
- Ensure that annual reports are submitted to the University Executive
- Ensure that mechanisms are in place to share information about safeguarding concerns with agencies who need to know, involving internal and external individuals appropriately;
- Review and update this Safeguarding policy as required in response to changes in legislation and guidance from appropriate external agencies.

The Safeguarding Standing Group members are:

- University Secretary (Safeguarding Lead)\*
- Head of Student Support and Wellbeing (Deputy Safeguarding Lead)\*
- Head of Reward, Policy and Compliance (Deputy Safeguarding Lead)\*
- Research Governance and Programme Manager (Deputy Safeguarding Lead)\*
- Head of Student Academic Support
- Head of Events and Strategic Initiatives
- CSA General Manager
- Director of Student Experience
- Head of Health and Safety
- Director of Campus Services
- Apprenticeships Office
- Education Lead for MK:U

\*Members of the Safeguarding Forum Group

All information received in relation to this policy will be stored and processed in line with applicable data protection legislation. To learn more about how we handle your data please review our [Privacy Policy](#)

<b>Document title</b>	Safeguarding Policy
<b>Document owner</b>	University Secretary
<b>Professional Service Unit/Department</b>	Executive Office
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<b>Approval date</b>	June 2022
<b>Date of next review</b>	August 2023

## Flowchart of procedure for reporting safeguarding concerns

This flowchart shows the steps that should be taken if you have concerns that a child, or adult at risk, is experiencing, or at risk of experiencing harm.

**In an emergency:**  
Call the Police on 999 or 101

**On campus:**  
Contact Security on  
T: 01234 750111 ext. 2222  
E: security@cranfield.ac.uk

**A safeguarding concern arises from information which indicates that an individual has or may have:**

- Behaved in a way that harmed (or may have harmed) a child(ren), or adult(s) at risk;
- Possibly committed a criminal offence against, or related to a child(ren);
- Behaved towards a child(ren) in a way that indicates they are unsuitable to work with children.

Contact your line manager, HR or the Deputy Safeguarding Lead and complete the Safeguarding Incident Form issued.

The Deputy Safeguarding Lead reviews Safeguarding Incident Reporting Form.

Deputy Safeguarding Lead seeks confidential advice, as appropriate from the Safeguarding Lead, Safeguarding Forum members or nominated authority (including concerns about the behaviour of another member of staff/student).

**Concern investigated by Safeguarding Team not the instigator.**

**Requires external referral**

Safeguarding Lead or Deputy makes decision to refer concern to relevant local Safeguarding Board/Police/Social Services for investigation and records action taken.

**Safeguarding Incident Reporting Form recorded securely.**

Participate in local Safeguarding Board/Police investigation as required.

Deputy Safeguarding Lead maintains contact with relevant local Safeguarding Board/Police/Social Services and records outcome and any resulting action.

**Requires in-house resolution**

No longer has concern

No action required – the Deputy Safeguarding Lead records outcome and advises Safeguarding Team.

Onward internal referral (could include formal investigation – either via disciplinary or grievance routes; further training or retraining)





## Safeguarding – Reporting an Incident/Concern Form

### Section 1 to be completed by individual reporting the concern

Name of vulnerable adult at risk (if known):	
Has the adult at risk given their consent to share the information? (Y/N)	
Student/Staff number (where applicable):	
Date of birth or age (if a child):	Gender: (M/F/Other)
Description of the safeguarding issue. This might include a factual account of something you have witnessed or an account of something a third party has reported to you.	
Time, location, date of the incident/s: (if known)	
Any other observations/information:	
Name of individual reporting the concern:	
Position:	
Action undertaken by person reporting the concern:	
Date concern reported:	



## Section 2 to be completed by the Safeguarding Lead or Deputy

Is the child or adult at risk who is the subject of the concern at immediate risk?	<b>Yes /No</b> <b>Details:</b>
Does the incident relate to an allegation about a student or member of staff?	
Should the member of staff or student be referred to HR/Education Services for consideration of further action?	
Does the incident require referral to the embedded HR / OH Provision / Student Support Services / Apprenticeship Office?	
Does the reported incident require referral to a local safeguarding team?	
Does the reported incident require escalation through Cranfield's Prevent Duty process?	
Does the reported incident constitute a criminal offence requiring referral to the police?	
<p><b>Actions to be Undertaken:</b></p> <ul style="list-style-type: none"> <li>a) No further action</li> <li>b) Referral to the HR/Education Services for consideration of a precautionary suspension.</li> <li>c) Referral to an alternative University policy or procedure such as the Staff or Student Disciplinary Procedure.</li> <li>d) Report the matter to the Local Authority Designated Officer (LADO)*</li> <li>e) Report the matter to the police*</li> <li>f) Referral to external NHS mental health and wellbeing services (Crisis team)</li> </ul> <p>*Report matter to ESFA (within 24hrs) if referral made concerns an apprenticeship learner.</p>	
Signed:	
Date:	

All information received in relation to this policy will be stored and processed in line with applicable data protection legislation. It is understood that personal data shared on this form is likely to be of a very sensitive nature. The data will not be shared with others unless we are required to by law, legal agreement, or if you disclose something which may put yourself or others at risk. Where possible safeguarding concerns will be investigated without naming individuals, however, if data does need to be shared with others, we will request your consent before doing so. To learn more about how we handle your data please review our [Privacy Policy](#)