

Safeguarding Policy

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1 Introduction

Aberystwyth University has a responsibility to prevent and report concerns about the abuse, neglect and ill-treatment of adults and children who are at risk of being harmed.

There are legal requirements on statutory bodies under the Care Act 2014, and statutory guidance (Safeguarding Wales) applying to the sector across Wales, for institutions to do everything they can to recognise, and report abuse quickly and appropriately to keep adults and children safe, and to prevent such abuse from happening in the first place.

Anyone who is employed by Aberystwyth University, regardless of the type or amount of contact they have with adults, children or young people who are at risk, has a role to play in safeguarding and protecting them. They must:

- Know how to recognise potential abuse of adults and young people at risk.
- Know what to do when safeguarding concerns arise.
- Understand what AU expects of them in terms of their own behaviour and actions.

2 Aims of Policy

The University recognises that it has a duty to safeguard individuals as part of its commitment to equal opportunities, the equality strategic plan the Prevent Duty and the provision of a safe working and learning environment.

The aims of this policy are to:-

- Ensure that staff obtain research ethics approval prior to undertaking any research which may have safeguarding considerations.
- Assist staff to recognise their responsibilities and ensure they are aware of the procedure they should follow if they suspect vulnerable individuals is experiencing or is at risk of experiencing harm
- Provide an assurance to all students, staff, volunteers, contractors and visitors that safeguarding is treated seriously by the University and the requirements of this policy will be undertaken / discharged in an effective and timely manner.
- Reflect the legislative context and take account of relevant guidance and good practice relating to safeguarding in the education sector.

2.1 Scope

This Policy applies to all University activities and facilities and covers:

- All staff employed by the University.
- All students registered and studying (including distance learners) at the University.
- Volunteers and contract supplier engaged on behalf of the University.
- All circumstances where visitors including children, young people under the age of 18 and adults at risk attend University premises and /or participate in University activities.
- Both on and off campus settings e.g. placements, work-based practice and learning exchanges and field trips.
- N.B. This list is not exhaustive.

3 Who to Contact

IF YOUR CONCERN IS URGENT (immediate harm to a child or adult at risk)

Contact the police by dialling 999 or 101.

If there are welfare concerns, about a child or adult at risk, not immediate danger contact social services. <https://www.ceredigion.gov.uk/resident/social-care-wellbeing/feeling-safe/worried-about-an-adult-or-child-safeguarding/>

Anwen Jones is our Lead Safeguarding Officer, if you have any queries or would like to discuss any issue related to child protection, please contact him via e-mail at aej@aber.ac.uk or by telephone on ext. 2009.

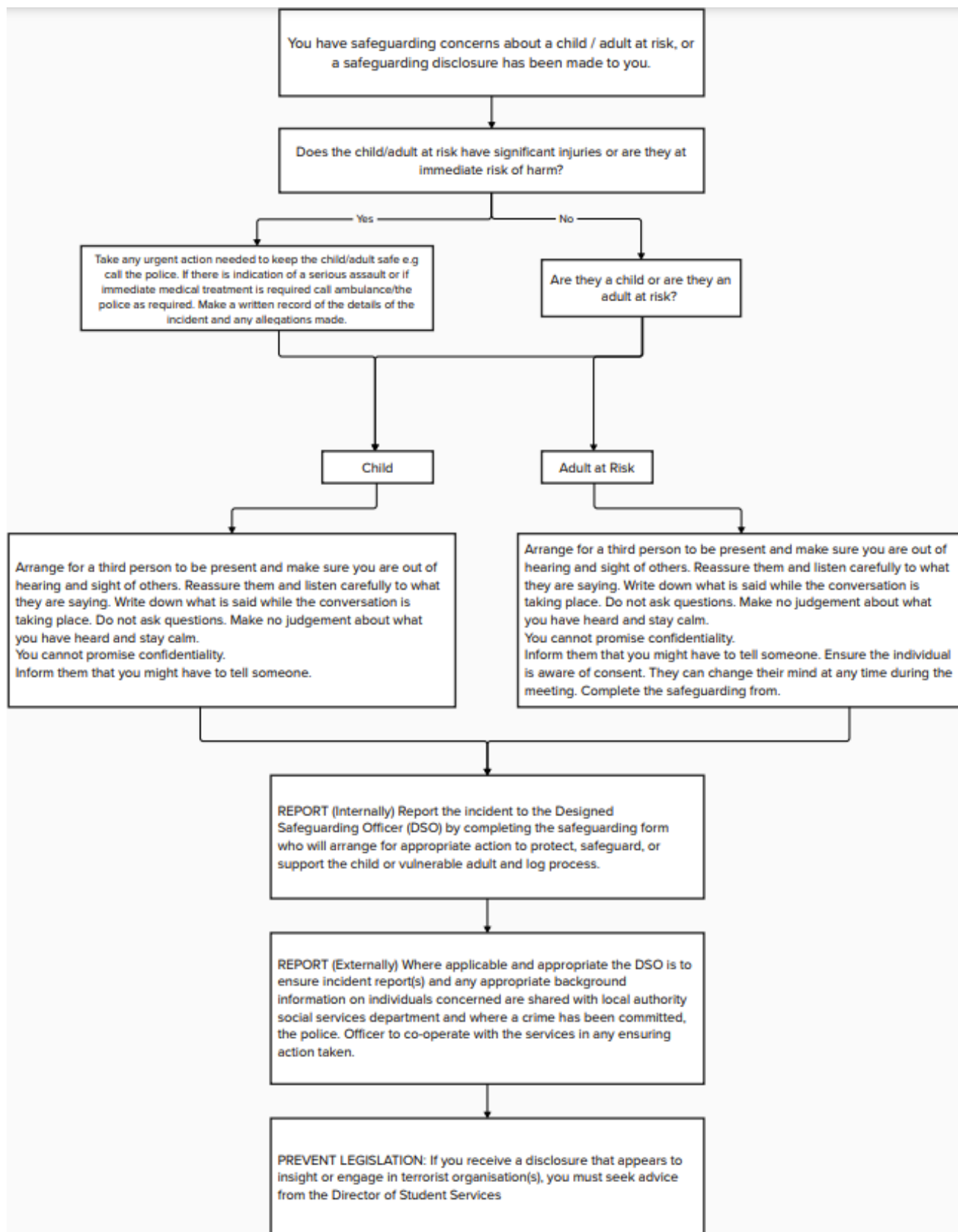
If you wish to report a safeguarding concern, use the referral form in appendix 1.

It is the responsibility of all staff, students and volunteers engaged in regulated activity to familiarise themselves with the reporting procedures before undertaking any regulated activity.

3.1 Contact List of Safeguarding Group

Department	Contact	Email	Ext	Role
LTS	Anwen Jones	aej@aber.ac.uk	2009	LSO
FBAPS	Dave Smith	dhs@aber.ac.uk	2446	DRO
FASS	Ruth Fowler	ruf@aber.ac.uk	1535	DRO
HR	Sharon Lilley	Shl27@aber.ac.uk	2484	PSO STAFF
ACADEMIC	Ian Munton	iam14@aber.ac.uk	2013	PSO STUDENTS
HEALTHCARE NURSING	Amanda Jones	Amj36@aber.ac.uk	1822	DSO
ARTS CENTRE	Amanda Trubshaw	amj@aber.ac.uk	1609	DSO
EFT	Maria Ferreira	elf@aber.ac.uk	1792	DSO
IEC	Hayley Goddard	hvg@aber.ac.uk	1985	DSO LEAD
IEC	Jan Hulin	Jah106@aber.ac.uk	2545	DSO
IEC	Peter Schofield	Pes26@aber.ac.uk	2548	DSO
IS	Elizabeth Kensler	eak@aber.ac.uk	1848	DSO
SPORTS	Darren Hathaway	dnh@aber.ac.uk	1521	DSO

3.2 Recording and Reporting Flowchart



4 Definitions

Adult at Risk: The University bases its definition of an “Adult at Risk” on that used within the Care Act 2014 and defines an Adult at Risk as someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing, or is at risk of abuse or neglect; and (iii) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Child: References to “child” or “children” in this policy means anyone under the age of 18 years.

Safeguarding: This describes the activity that is undertaken to protect adults and children at risk from abuse, harm, ill-treatment and neglect.

Abuse: This is the ill-treatment or abuse of any adults and children at risk. A person may abuse or neglect an adult at risk by inflicting harm or by knowingly failing to act to prevent harm. Individuals can be abused in a family, at an event or in any type of institution, by those known to them or others, for example by those responsible for organising, participating or providing support or care.

Neglect: Failure to provide needed care or attention to people or things that are your responsibility.

Prevention: This is how we seek to reduce the abuse of adults and children at risk occurring in the first place. This includes training, guidance and support for employees and volunteers, as well as for those receiving services.

University Premises: all buildings and grounds owned or operated by the University.

5 Safeguarding Roles and Responsibilities

5.1 All members of staff

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

- Understand what abuse is
- Listen carefully to children, young people and adults at risk
- Be aware of and act in accordance with the University’s safeguarding policy and procedures
- Participate in appropriate safeguarding and Prevent training
- Consult with and take advice from the University’s designated lead for Prevent where there is reason to believe that a student or staff member to whom this policy applies may be at risk of being drawn into radicalisation or terrorism.

5.2 Heads of Department

Each head of department is accountable for the adoption and implementation of this policy. They are required to promote the importance of safeguarding within their department and ensure that appropriate systems are in place for:

- All their staff to become familiar with the Safeguarding Policy during their induction
- All staff to work within the principles of the policy and to report any concerns at the earliest opportunity
- Relevant staff to review the department’s activities and follow the safeguarding risk assessment process.

The University has the following designated roles with safeguarding responsibilities:

5.3 Lead Safeguarding Officer (LSO) *Member of the Executive Team*

This person will have overall accountability and strategic responsibility for safeguarding groups at risk of harm within the University. The person will be main contact within the University for the protection of children, young people and adults at risk. Responsible for ensuring the policy and procedures are monitored and reviewed in accordance with any changes in legislation and/or guidance.

5.4 Designated Reporting Officer (DRO)

Undertaking relevant training in Safeguarding and Prevent procedures and ensuring their knowledge is kept up to date. Acting as a source of support, advice and expertise to staff on matters of safeguarding and the Prevent Duty. Acting as a point of contact for those who have safeguarding concerns, receiving information, and recording concerns.

5.5 Principal Safeguarding Officer (PSO) – Students; Director of Students Services

Strategic responsibility for overseeing the implementations of the safeguarding policy and providing leadership support to Departmental Officers. Ensuring that appropriate members of staff are provided with information, advice, and training. Establishing and maintaining contact with local statutory agencies including the police and social services. Responding appropriately to disclosures or concerns to any well-being. Maintaining confidential records. Following safeguarding referral procedures.

5.6 Principal Safeguarding Officer (PSO) – Staff; Head of HR.

Strategic responsibility for overseeing the implementations of the safeguarding policy and providing leadership support to Departmental Officers. Ensuring that all employees of the University have, when necessary, undergone the appropriate checks under this policy. All transitional legal requirements relating to employment are complied with. Providing advice and guidance to all departments. Responding appropriately to disclosures or concerns against members of staff which relate to well-being.

5.7 Departmental Safeguarding Officers (DSO)

Those in faculties and professional services departments where there are programmes or activities where staff and students work with children, young people and adults at risk. Offering the initial point of contact for any concerns. Highlighting and championing best practice. Ensuring DBS is carried out in the area. Ensuring local procedures are followed.

5.8 Departmental Research Safeguarding Officers (DRSO) (where appropriate)

For research activities. The DRSO will usually be overall responsible for the activity. Where a research project involves vulnerable individuals or security-sensitive material, ethical approval must be obtained from the University's Research Ethics Committee.

In addition, the University has a Safeguarding Group

The Safeguarding Group is responsible for the development, implementation, monitoring and review of the University's Safeguarding Policy and its application and for approving departmental procedures in line with changes in legislation and best practice guidance. When changes are made to the policy, it will be dated and the approved version signed by the Chair of the Safeguarding Group.

6 Why the Policy is Important

Adults, children and young people at risk of abuse may have additional support needs, meaning that they are more likely to experience abuse, and less able to protect themselves from it. The abuse can have devastating effects on their physical, mental, emotional and social wellbeing.

Staff should adhere to all legal requirements and procedures as well as statutory guidance which means that AU must protect adults at risk and children. The relevant law and guidance are as follows:

The social services and wellbeing (Wales) Act 2014 was enacted by the National Assembly for Wales to reform social services law; to make provision about:

- Improving the wellbeing outcomes for people who need care and support and carers who need support.
- Co-operation and partnership by public authorities with a view to improving the well-being of people.
- Complaints relating to social care and palliative care; and for connected purposes.
- <http://www.legislation.gov.uk/anaw/2014/4/enacted>

Violence against Women and Domestic Abuse - [Violence against women \(who.int\)](http://www.who.int)

Equalities and Diversity - [Equality & Diversity : Aberystwyth University](#)

6.1 The Prevent Duty

Aberystwyth University has a statutory duty to play its part in the Government's strategy to prevent terrorism by reducing the possibility of radicalisation by having 'due regard to the need to prevent people from being drawn into terrorism' (taken from the [Counter-Terrorism and Security Act 2015](#)).

However, the University's approach to Prevent is not simply about identifying those at risk of being drawn into terrorism, but to ensure that individuals facing challenges and difficulties receive proper support. This is framed by our commitment to the wellbeing of our students and staff and the safeguarding of all potentially vulnerable individuals.

The Prevent Duty is concerned with safeguarding students and staff who are vulnerable to being drawn into terrorism. This will involve an awareness of the factors that may contribute to vulnerability, which include:

- Being rejected by peer, faith or social group/family
- Pressure from persons linked to extremism.
- Victim or witness to race or religious hate crime.
- Conflict with family over religious beliefs/lifestyle/politics
- Identity confusion
- Recent religious conversion
- Change in behaviour or appearance due to new influences
- Under Achievement
- May possess literature related to extreme views
- Experience of poverty, disadvantage or social exclusion

- Extremist influences
- A series of traumatic events – global, national or personal

All staff are asked to remain vigilant and raise concerns where it's considered that individuals or groups of students may be at risk of being drawn into terrorism.

Therefore, the University's response to the Prevent duty is guided by our institutional values of inclusiveness and collaboration and our commitment to ensure that everyone on campus is treated fairly, with dignity and respect, and in a supportive and welcoming environment. We are committed to ensuring a balance between the obligations of the Prevent Duty and our wider obligations to Freedom of Speech, Academic Freedom and Equality. We will address the requirements of the duty responsibly and proportionately as part of our extensive wellbeing and safeguarding provision.

Duties:

- The University will make use of internal mechanisms to share information about Prevent across the institution.
- The University will ensure that staff will be provided with appropriate training, specific to their needs in accordance with statutory requirements.
- The University will carry out risk assessment proportionate to the size and complexity of the institution. This will include following appropriate policies and procedures are in place to help identify and support any individual who may be vulnerable and provide clear management oversight of risks.
- On the basis of the risk assessment the University will develop an action plan to address actions which need to be taken to mitigate potential risks.

Further details available here about our [Prevent Duty](#)

6.2 Domestic Abuse

The University takes seriously the need to create and maintain a safe and secure environment in which employees can reach their full potential. In this context, there are a number of underlying and supportive initiatives regarding the safeguarding of employees potentially at risk of harm from social and domestic abuse. Further details, including guidance for managers, support for employees including signposting to external professional agencies can be found in the University's [Domestic Abuse Policy](#)

Any employee who is experiencing, or has experienced, domestic abuse, sexual violence and/or stalking is strongly encouraged to disclose such behaviour(s) under the Domestic Abuse Policy Statement. The University is committed to dealing with any such disclosure in a supportive and, where possible, confidential manner.

7 Key Principles

The University:

- Is committed to providing a safe environment for all its employees, students and people who use its facilities and services;
- Recognises that adults, children and young people may require additional protection in accordance with its statutory duties and common law duty of care;
- Recognises its responsibility to raise awareness with staff and students of this policy and the relevant local procedures;
- Is committed to ensuring that appropriate procedures are in place to enable it to discharge its duties and to ensure that cases of suspected abuse or neglect of vulnerable adults, children and young people or concerns re potential radicalisation are dealt with sensitively and effectively in accordance with the law and relevant guidance;
- be committed to fully co-operating with all other agencies in the interests of safeguarding adults, children and young people at risk of abuse and neglect.
- be aware of the impact and effects of abuse and neglect on adults, children and young people at risk.

Safeguarding Wales

8 Local Procedures and Arrangements

Any local procedures and codes of practice developed by a specific research group, faculty or department will be subject to approval by the Safeguarding Group and will be available on the Safeguarding page of the University's website unless restricted due to their sensitivity. Further copies will be available locally within departments.

Responsibilities by Activity

8.1 Students Admissions

In admitting students under the age of 18, Aberystwyth University acknowledges that it will have an enhanced duty towards these individuals as they are children.

Academic departments, via their Departmental Safeguarding Officers and/or Academic Registry, will ensure that any staff members acting as personal tutor to under-18 students have an appropriate DBS disclosure and are made aware of the University's Safeguarding Policy and associated policies, procedures, guidelines and training available.

The University will inform Aberystwyth's Students' Union of any student under the age 18 to ensure that their access to the licensed premises can be monitored.

The University will ensure that the Head of Facilities Management, the Director of Students Support and relevant contacts in Academic Departments are provided with a list of students under 18 years of age.

8.2 Research

Where children/young people are involved in research, the work is subject to approval by the Research Ethics Committee and will be covered by all relevant H&S Policy and governance arrangements. The Departmental Research Safeguarding Officer (RSO) must retain oversight of such involvement. Sensitive research must also be assessed in relation to the Prevent Duty.

8.3 Children/Young People of Staff and Students

Staff and students who bring children or young people onto University premises are primarily responsible for the supervision and safety of those children or young people. Staff and students who wish to bring their children into the department must first get the approval/permission of their Head of Department and must directly supervise their child at all times. Adherence to all local rules must also be practiced. Such rules may restrict children from accessing certain areas even when accompanied by their parent/guardian due to their inherent risks.

8.4 External Organisation of Conferences on Campus

It is the responsibility of the organisation running the conference/event to safeguard individuals attending the conference/event and have the appropriate risk assessments and safeguarding measures in place e.g. appropriate staff-to-children ratios and DBS checks if required.

The department working with the external organiser will be responsible for asking the external conference/event organiser visiting the University to provide a copy of their Safeguarding Policy and DBS policy prior to the booking being taken. If the organisation is unable to provide such a policy the PSO can provide basic guidance on this matter to the conference organiser, as the conference/event cannot go ahead without a safeguarding Policy in place.

8.5 Events on Campus Involving Overnight Accommodation

Where an event will involve young people having to reside on university campus overnight, additional considerations must be taken to ensure the adequate supervision, not just for the event itself, but also other periods when young people will be on campus. The same will apply if a group are taken off campus for an event.

8.6 Online Environment

a) Teaching, Learning, support, and Research

Providing services online allows the University to have a wider reach, and to support, teach and carry out research with more children, young people and adults at risk. These activities may include:

- Teaching and learning activities,
- Research activities,
- Forums,
- Online supervision and mentoring meetings
- Online counselling services
- Chat and instant messaging
- Live streaming

Staff undertaking online activity on behalf of the University must always ensure that they use age-appropriate language in the communications and must also make sure that all communications are relevant to the work they are involved in.

Staff must use Aberystwyth University accounts to communicate with children, young people and adults at risk. This includes via email, or social media and must never use personal accounts. In addition, wherever possible individuals must use a Aberystwyth University device to communicate.

b) Live streaming

Live streaming is a valuable way for the university to connect with its wider community, however, staff who are considering live streaming an event must be aware of the safety and wellbeing of any children, young people and adults at risk who are part of the event.

It is essential to ensure that all participants, but particularly children, young people and adults at risk, are reminded not to share any personal information during the live streaming event, and not to respond to communication / contact from individuals they don't know. Where possible access to the live streaming should be carefully controlled and the use of a login and password is recommended so that the audience can be restricted.

8.7 Staff and Student Recruitment

The University will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children, young people and adults in a vulnerable situation.

9 Volunteers

For the purpose of this policy, a volunteer will be treated in the context of being an employee or student and if there is appropriate involvement with vulnerable groups will fall under the remit of the respective PSO.

Employees and volunteers engaged in social networking for educational, research or information purposes should use the following safeguards:

- Obtain appropriate permission from senior departmental or Institute employees before using social networking for such purposes and ensure that any ethical implications have been reviewed and addressed
- Ensure that appropriate privacy or other settings (if relevant) have been applied to discussion groups, making sure Individuals permission has been granted.
- Ensure that content does not bring the University or its community into disrepute, breach confidentiality, infringe copyright or do anything that could be considered discriminatory, offensive or derogatory.

10 Work Experience

When work or work experience is offered to adults, children and young people, the University owes that person the same or a higher level of duty of care for their health, safety and welfare as for all other employees or volunteers. There may be risks that may be specific to the work activity or an increased risk for young people and all potential risks must be documented in the risk assessment. Where there is significant risk, these must be discussed with the young person (and in many cases also with the school or college) prior to them commencing their work experience. There may be certain work activities, work environments or specific types of equipment with which the young person will not be able to engage due to tighter regulatory restrictions laid down in specific pieces of legislation and/or stated within certain University policies:

10.1 Work Experience on Campus

Guidelines to support work experience placements (of young persons) on campus

10.1.1 Introduction

The University has a duty of care to safeguard and promote the welfare of children and to protect all children from harm who are involved in activities run by the University.

The university requires all staff, that come into contact with children on work experience as part of their day to day duties, to ensure their safety and protection at all times by adhering closely to the Safeguarding Policy and this appendix.

10.1.2 Scope

This appendix is to guide those members of staff dealing adults, children and young people who may spend short periods of time at the University on work experience/placement.

10.1.3 Arrangements and Responsibilities for those undertaking work experience

All work experience students must be supervised by an identified member of staff within the department ("the supervisor"). The supervisor must:

- Fully understand and meet their responsibilities as set out in the Safeguarding Policy and this appendix.
- Always ensure the safeguarding and protection of any work experience students under their supervision.
- Liaise with the young person's educational provider as required and complete and return any paperwork required as part of the agreement to host a period of work experience.
- Obtain an emergency contact number for the work experience student's parents (or carer / guardian)
- Gain parental consent if it is necessary for any work experience students to be taken off campus at any time during their placement.
- Gain parental consent if it is necessary for any work experience students to travel in any staff members car at any time during their placement (including updating ABW to confirm that they have the necessary car insurance for business purposes)

- Complete a risk assessment for the young person/work experience at least 6 weeks before the commencement of the work experience and send a copy to HR and H&S so that any DBS check or follow up H&S concerns/actions can be taken.
- Where a DBS check is required (as specified in the policy) they must complete a check in good time.
- Complete an induction checklist for each person undertaking work experience and retain it (with any parental/school consent) for six months following the end of work experience. All those undertaking work experience should be informed of the health and safety procedures and receive a copy of the safeguarding policy when they first arrive.

10.1.4 Further Information

Staff can seek information and advice from the University's Principle Safeguarding Officer – staff, where they have any questions or potential concerns about a placement.

10.1.5 Health and Safety Department

The H&S department will keep a register of all work experience placements by department including a copy of the risk assessment and induction checklist.

10.1.6 Human Resources Department

The HR Department will check risk assessment against the requirement for a DBS check and provide advice to the host Head of Department so that they can decide on whether a DBS check is required for the supervisor and any of his staff members.

11 Risk Assessment

All staff that intend to or, may be put in the position of working with children, young people or adults in a vulnerable situation should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

A designated individual should complete a risk assessment before any new or changed programme, event, visit or any other activity involving vulnerable individuals or before admitting or employing under-18s.

All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

Further information about [Risk Assessments](#)

12 Duty to Report Safeguarding Concerns

The recognition of abuse or harm is not always easy and the University acknowledges that its employees may not be experienced in this area and will not easily know whether it is taking place. For example, it may be that the behaviour that causes concern is bad practice rather than abuse. Indeed, it is not the place of staff or students in general to make such a judgement. However, the University

recognises that it has a responsibility to act on any concerns in order to safeguard the welfare of 'at risk' groups.

It is the University's policy that:

- a) If any member of staff, any student or volunteer has knowledge of concerns or suspicions that a child, young person, or at-risk adult is suffering, has suffered or is likely to be at risk of harm, then they must refer the matter to the DRO who will liaise with the relevant statutory agencies and inform the LSO and PSOs. If the matter is very serious or urgent and the DRO cannot be contacted, the individual raising the concern should contact the police directly (and subsequently report the matter to the DRO).
- b) Alternatively, if any member of staff, student or volunteer has specific concerns relating to a child, young person or at risk adult's safety or welfare on any programme or, activity during their use of University facilities they can raise the matter, in the first instance, with their Faculty PVC, Head of Department or Head of Professional Service who must then report the concerns to the DRO (in accordance with 12a above) on their behalf.
- c) Where an allegation of abuse or inappropriate behaviour is made, by a student, staff member, contractor, visitor, etc., against a member of staff and relates to their actions as an employee of the University, the matter must also be reported to the Director of HR & Organisational Development (HR&OD) or depute who will provide advice and guidance in respect of the contractual position and relevant procedures that may apply. In the case of allegations against students these must also be reported to the relevant Faculty Registrar.
- d) Upon receiving a report, the DRO must assess whether they should report the concerns to the officer in the relevant Authority(s) e.g. Social Services and where appropriate to the Police. In addition, immediate measures may be put in place by the DRO to ensure that the child or vulnerable individual is safe and that any necessary evidence is protected.

13 Suspension

If appropriate, the DRO should immediately inform the Lead Safeguarding Officer that it may be necessary to suspend the person. This must be done in accordance with the relevant staff or student policy. Where exclusion of any other individual from University premises is proposed, this must be done under the appropriate University procedures pending determination of the issue.

The Lead Safeguarding Officer (LSO) must raise the proposed suspension of a member of staff with the PSO who will follow the appropriate policy and procedure for consideration of suspension of the member of staff.

The Lead Safeguarding Officer must raise the proposed suspension of a student with the PSO for students/Academic Registrar who will follow the appropriate policy and procedure for consideration of suspension of the student.

It is important that any response is properly co-ordinated and that events are managed in the right order. For this reason, the University will consider taking no direct action without the advice and

agreement of the investigating agencies (e.g. the Police, NSPCC or Social Services), except where such action is necessary to protect an individual and as a precautionary measure.

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

Irrespective of the outcome of any Police or Social Services investigations, the University may consider disciplinary action in accordance with its Disciplinary Procedures:

- Staff Disciplinary Procedure
- Student Disciplinary Procedure

Every effort should be made to maintain confidentiality. Suspicions must not be discussed with anyone else on campus other than those essential to the investigation or process.

14 Disclosure and Barring Service

The Disclosure and Barring Service carries out criminal record checks for specific positions and professions and a DBS certificate is required for staff and volunteers working in these specific positions and professions as part of the University's pre-recruitment check following an offer of employment, including volunteering roles.

Specific students on specific undergraduate and postgraduate courses may be required to have a DBS check if working with vulnerable individuals is part of the course process as defined by the legal definitions of regulated activity.

With effect from 1 November 2022, Aberystwyth University has engaged with Powys Council to undertake online DBS checks for any persons that may need one as part of their role requirements.

Those requiring a DBS check will now be able to complete their application using an online system. The candidate/employee requiring a check will now be able to access an online portal with 24-hour support to complete the necessary form. They will then be required to submit their required supporting documentation to Human Resources.

14.1 Guidance on Rehabilitation of Offenders

- As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of responsibility involving children, young persons and adults who may be at risk of harm, the University complies fully with the DBS Code of Practice which can be found at (<http://www.homeoffice.gov.uk/agencies-publicbodies/dbs/>). A hard copy of the Code can be obtained from the HR Department.
- The University is committed to the fair treatment of applicants for employment, staff and users of its services regardless of age, disability, gender reassignment, marriage and civil

partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or language preference (English or Welsh).

- The University promotes job applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- The University's main concerns in respect of applicants with criminal convictions are to:
- Ensure the safety and well-being of our staff and students, visitors, volunteers and contractors.
- Ensure the security of university property and finances.
- Protect the University's reputation.
- Carry out our legal responsibilities and duties Any selection decision will be taken in the light.
- A DBS check is only requested after a thorough assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, job adverts and recruitment documentation will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Unless the nature of the position allows the University to ask questions about an individual's entire criminal record, we only ask questions in the application form about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.
- Posts in some areas of the University, are considered to be exempt from the provisions of the Rehabilitation of Offenders Act 1974. This means that ex-offenders have to disclose information about spent as well as unspent convictions. Where this is required, it will be made clear in the job advert. Further information is available in our Guidance for Applicants required to use the DBS Disclosure service.
- DBS application forms are available from the HR Department if the above factors and relevance to the role.
- For details of confidentiality in relation to DBS checks and data protection please see our job applicant privacy notice which can be found at: [Privacy-Notice---Recruitment-via-E-Recruiter.pdf](#) ([aber.ac.uk](#))
- The University will also ensure that all those involved in the recruitment and selection process have been suitably trained to identify and assess the relevance and circumstances of an offence relating to the employment of ex-offenders under the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, the University will ensure that an open and reasoned discussion takes place on the subject of any offences or other matter that might be relevant to the position.
- Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of appointment.
- The University makes every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and make a copy available on request.
- The university undertakes to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of appointment. The fact that an applicant has a criminal conviction will not necessarily bar that person from working with us.

This will depend upon the nature of the position and the circumstances and the background of the offences.

14.2 DBS - Disclosure Information Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those entitled to see it in the course of their duties. This includes the Lead Signatory and the Human Resources Department or Admissions Team as appropriate.

14.2.1 Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given. In addition, details of a DBS disclosure will not be kept on an employee's file or student record and will always be kept separately and securely, in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see the information as part of their duties.

14.2.2 Retention

Once a recruitment decision had been made, disclosure information is not kept for longer than is absolutely necessary. This is generally for a period up to six months to allow for the consideration and resolution of any disputes or complaints. If, in exceptional circumstances it is considered necessary to keep the disclosure information for longer than six months, the University may consult the DBS and will give full consideration to the General Data Protection Regulations and the individual's human rights before so doing. Throughout this time the above conditions regarding safe storage and controlled access will prevail.

14.2.3 Disposal

Once the retention period has elapsed, the University will ensure that any disclosure information is destroyed by secure means. Whilst awaiting destruction disclosure information will not be kept in any insecure receptacle. The disclosure information will not be photocopied nor will any other image of the documentation be retained. Notwithstanding the above, we may keep a record of the contents of the disclosure, the name of the subject, the unique reference number and the details of the recruitment decision taken.

Information in relation to allegations of abuse or neglect

14.2.4 Handling

In accordance with GDPR requirements, information relating to an allegation(s) made under this policy will only be shared with those entitled to see it in the course of their duties. This includes the Lead Signatory and the Human Resources Department or Admissions Team as appropriate.

14.2.5 Usage

Details of an allegation(s) and their investigation will not be kept on an employee's file or student record and will always be kept separately and securely, in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see the information as part of their duties. For investigations concerning staff, this information will be stored by the PSO Staff in the HR Department. For investigations concerning students, the information will be stored by the PSO for Students in the Student Support and Careers Service Department.

14.2.6 Retention

Information gathered as part of an investigation will not be kept for longer than is absolutely necessary. This is generally for no longer than the duration of any warning or penalty imposed. If, in exceptional circumstances it is considered necessary to keep the information for longer than the period specified in the outcome letter to the employee or student, the University will consult the University's Information Governance Manager and give full consideration to the General Data Protection Regulation and the individual's human rights before deciding to keep the information for longer. Throughout this time the above conditions regarding safe storage and controlled access will prevail.

14.2.7 Disposal

Once the retention period has elapsed, the University will ensure that any information in relation to the allegation/investigation is destroyed by secure means. Whilst awaiting destruction the information will not be kept in any insecure receptacle. The information will not be photocopied nor will any other image of the documentation be retained. Notwithstanding the above, we may keep a record of the contents of the information, the name of the subject, any unique reference number and the details of the decision taken.

14.2.8 Documentation concerning allegations about contractors or visitors.

This information will be held by the DRO separately from other records. All associated processes and follow-up actions will also be documented in the same file. Retention and disposal will be in line with 14.2.6 and 14.2.7.

15 Storage, Handling and Retention of Documents

(Students and Staff)

The General Data Protection Regulation ([GDPR](#)) 2018, or more specifically the Data Protection Act ([DPA](#)) 2018, allows for the processing of data for PREVENT purposes.

This policy and its application confirm with the requirements of the DPA 2018 and all data in relation to safeguarding issues concerning students, staff, contractors and visitors will be gathered, stored, handled, disclosed and destroyed in accordance with that Regulation.

Detailed information concerning disclosure and allegations will not be kept on an employee's file or student record and will always be kept separately and securely, in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see the information as part of their duties.

16 Training and Guidance

It is essential that training is provided for key staff, students and volunteers on relevant issues connected with this policy. Training for all categories of Safeguarding Officer is required on a regular basis (normally every two years) and when policies and procedures substantially change.

Any member of staff planning activities with/for children or adults at risk is required to undertake appropriate training. For staff with identified safeguarding roles, such training will be mandatory.

The University will provide training and briefing sessions for relevant staff, students and volunteers from time to time. Information on training can be found in the Staff Development Programme on the HR website and on its Safeguarding pages.

The training will be overseen and arranged by the Safeguarding Group which will collaborate with relevant partnerships and agencies in order to raise awareness and understanding of safeguarding matters.

17 Prevent Training

All staff must undertake the mandatory PREVENT training which is available via Blackboard <https://blackboard.aber.ac.uk/>.

18 Policy Implementation and Review

The Safeguarding Group will co-ordinate a review of this policy annually in order to maintain compliance with legislation and good practice. The review will be undertaken in liaison with the recognised trade unions and any proposed amendments will be submitted to the University Executive and the appropriate relevant committee(s) as required.

19 Impact Assessment

The University is committed to embedding the Equality Act into its policies, procedures and practices. This policy has been equality impact assessed in accordance with this scheme.

The University is committed to embedding the Welsh Language Standards 2018 in its policies, procedures and practices. This policy has been Welsh language impact assessed in accordance with these standards.

20 Welsh Language Standards

Aberystwyth University is committed to providing a high-quality service and experience to staff, students, and members of the public.

In accordance with the Welsh Language Standards that came into effect on 1 April 2018 individuals have the right to use the Welsh Language to:

- (a) Make a complaint
- (b) Respond to a complaint or allegation

A simultaneous translation service from Welsh to English will be provided at the meeting when the meeting cannot be conducted solely in Welsh.

Suspensions that Aberystwyth University has breached the terms of its Welsh Language Standards should be submitted via the form available at: [Complaints Procedure](#)

contact thr@aber.ac.uk

Safeguarding Reporting

Name of person raising concern:	
Name of the individual about whom concern is about:	Date of incident:
Nature of allegation/concern	
Name of DRO/DSO:	Date raised with DRO/DSO
Notes from DRO/DSO	
Name and contact details of any third party that has been involved (social worker/police)	