



## Safeguarding Vulnerable Groups Guidance for Staff

### Purpose of this Document

This document contains guidelines and procedures for protecting the safety and welfare of children and vulnerable adults participating in University activities or visiting University premises.

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## **1.0 INTRODUCTION**

- 1.0.1 The Safeguarding Vulnerable Groups Policy establishes the principles and parameters within which the University will work to ensure the safety and welfare of all vulnerable groups who visit University premises or engage in activities organised or supported by the University.
- 1.0.2 This document is intended to provide practical guidance for those staff who are responsible for taking action under the Policy, and should be read in conjunction with the Policy itself. This document does not repeat key information contained in the Safeguarding Vulnerable Groups policy, such as key contacts for referrals, relevant definitions, general and specific responsibilities and so on.

## **2.0 RESPONDING TO CONCERNS**

- 2.0.1. Where an individual is verbally reporting concerns regarding a risk of harm, the following principles should be followed by the person receiving the information:
- Assure them that you are taking them seriously;
  - Listen carefully to what they are telling you, stay calm, get as clear a picture as you can, but avoid asking too many questions;
  - Do not make promises of complete confidentiality;
  - Explain that you have a duty to tell designated staff members, and that their concerns may be shared with others who could have a part to play in protecting them;
  - Reassure them that they will be involved in decisions about what will happen wherever possible. For concerns which involve potential risk to children, this cannot always be guaranteed;
  - Explain that you will try to take steps to protect them from further abuse or harm wherever possible;
  - If they have specific communication needs, provide support and information in a way that is most appropriate to them;
  - Do not be judgemental or jump to conclusions;
  - Make a full record of what had been said, heard, and/or seen as soon as possible. See 8.0 for guidance regarding recording and storing of information;
  - Do not approach the person(s) against whom the allegation has been made.

## **3.0 REPORTING CONCERNS**

- 3.0.1. Section 6.3. of the Safeguarding Vulnerable Groups Policy provides contact details for key University staff and external agencies (where appropriate) who should be contacted to report concerns.
- 3.0.2. The University will not investigate concerns directly, but rather will refer them to the Police, Adult or Children's Social Care, The NSPCC or other organisations as appropriate. However, the University may need to undertake some preliminary enquiries to establish facts and will do so in accordance with any detailed guidelines issued or endorsed by the University from time to time.

### **3.1. Concerns regarding historic abuse**

- 3.1.1. Where concerns or allegations of abuse are raised by individuals over the age of eighteen who may have been abused when under eighteen, or by adults who are not currently categorised as vulnerable but who may have been abused when they were previously categorised as vulnerable, responsibility for referring information relating to any offence rests with that individual. However, in the circumstances following, the University may still have a duty to act:
- Where other children or vulnerable adults may still be at risk from an alleged perpetrator;
  - When an individual is lacking the capacity to refer information;
  - When any uncertainty regarding the previous two statements exists.
- 3.1.2. The following factors should be taken into account when deciding whether other children or vulnerable adults may still be at risk:
- Does the alleged perpetrator have access/contact with children or vulnerable adults (e.g. siblings, relatives etc.);
  - What is the profession of the alleged perpetrator and is it possible they have contact with vulnerable groups?
- 3.1.3. Where concerns exist that other children or vulnerable adults may be at risk, it may be necessary for the University to make a referral of information to external agencies such as local authorities, The Police or NSPCC. Where possible, this should be undertaken with the consent of the individual raising the concerns. Where the individual does not consent, it may be necessary for the University to make a referral of information against the wishes of the individual, where there are risks of significant harm to children or vulnerable adults. More information is provided in 6.0.

### **3.2. Seven golden rules for information sharing**

- 3.2.1. The NTU Data Protection Guidelines for Staff contains clear guidance regarding information sharing.
- 3.2.2. Advice regarding data sharing can be obtained from Legal Services upon request.
- 3.2.3. HM Government have issued detailed guidance regarding data sharing, in the publication 'Information Sharing: Guidance for practitioners and managers'. This guidance lists seven golden rules for information sharing:
- Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately;
  - Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
  - Seek advice if you are in any doubt, without disclosing the identity of the person where possible;
  - Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be

overridden in the public interest. You will need to base your judgement on the facts of the case;

- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions;
- Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely;
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

#### **4.0 POTENTIAL INDICATORS OF ABUSE**

4.0.1. There are a number of common factors, which can be potential indicators of abuse in children and/or vulnerable adults. It is important to remember that many of the characteristics and signs detailed can also be normal for some individuals, so whilst it is important to be vigilant in such matters, staff should also be tactful in their approach. This information is provided as a guide only and further support should be sought following the guidance in the Safeguarding Vulnerable Groups policy where there are possible safeguarding concerns.

##### **4.1. Potential indicators of physical abuse**

- Injuries to any part of the body;
- Individuals who find it painful to walk, sit down, to move their jaws or are in some other kind of pain;
- Injuries which are not typical of the bumps and scrapes associated with regular activities e.g. injuries of an usual shape/type or with very clearly defined marks that may be the result of being hit with an object;
- The regular occurrence of unexplained injuries;
- Frequent injuries, where explanations may be confused;
- Conflicting explanations of how the injuries were sustained;
- Furtive/secretive behaviour;
- Uncharacteristic aggression or withdrawn behaviour;
- Compulsive eating or sudden loss of appetite;
- Sudden ill coordination;
- Difficulty staying awake;
- Wider concerns about the family/home life situation.

##### **4.2. Potential indicators of emotional abuse**

- Poor attachment relationships with children;

- Unresponsive or neglectful behaviour towards the individual's emotional or psychological needs;
- Persistent negative comments about the individual;
- Inappropriate or inconsistent developmental expectations of the individual;
- Parental problems that supersede the needs of the child/vulnerable adult;
- Dysfunctional family relationships including domestic violence;
- Emotional indicators such as low self-esteem, unhappiness, fear, distress, anxiety;
- Behavioural indicators such as attention seeking, opposing, withdrawn, insecure;
- Physical indicators such as failure to thrive/faltering growth, delay in achieving developmental, cognitive or educational milestones.

#### **4.3. Potential indicators of sexual abuse**

- Signs of blood or other discharge on the individual's clothes;
- Awkwardness in walking or sitting down;
- Stomach pains;
- Bed wetting;
- Tiredness;
- Extreme variations in behaviour e.g. anxiety, aggression or withdrawal;
- Sexually provocative behaviour or knowledge that is incompatible with the individual's age and understanding;
- Drawings and or written work which are sexually explicit and inappropriate for the context of the work (indirect disclosure);
- Direct disclosure.

#### **4.4. Potential indicators of neglect**

- Abnormal growth including failure to thrive;
- Recurrent infection;
- Unkempt dirty appearance;
- Poor body hygiene;
- Inadequate/unwashed clothes;
- Hunger;
- Listlessness;
- Attachment disorders;
- Indiscriminate friendliness;

- Poor social relationships;
- Poor concentration;
- Developmental delays;
- Low self-esteem;
- Insufficient food, heating and ventilation in the home;
- Risk from animals in the household;
- Inappropriate sleeping arrangements and inadequate bedding;
- Dangerous or hazardous environment.

## **5.0 POTENTIAL INDICATORS OF RADICALISATION**

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

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

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

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

### **5.1. Potential Indicators of engagement with an extremist group, cause or ideology**

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;

- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

**5.2. Potential indicators that an individual has an intention to cause harm, use violence or other illegal means**

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

**5.3. Potential indicators that an individual is capable of causing harm or contributing directly or indirectly to an act of terrorism**

- Having a history of violence;
- Being criminally versatile and using criminal networks to support extremist goals;
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

5.4. The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. Outward expression of faith, in the absence of any other indicator of vulnerability, is not a reason to make a referral of concern.

5.5. Further guidance for preventing violent extremism and radicalisation in higher education, can be found on the Safe Campus Communities web site (<http://www.safecampuscommunities.ac.uk/>)

**6.0 REFERRALS TO EXTERNAL AGENCIES**

**6.1. Referrals to the Local Authority - Children**



- 6.1.1. The University is required to refer concerns to the Local Authority where it is believed that a child:
- Has suffered significant harm;
  - Is likely to suffer significant harm;
  - Has a disability, developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent) under the Children Act 1989;
  - Is a Child in Need whose development would be likely to be impaired without provision of services.
- 6.1.2. Referrals are made to the Local Authority area in which the child resides. Where this is unknown or unclear, referrals may be made via Nottingham City Local Authority, The NSPCC or The Police, depending on the circumstances of the case.
- 6.1.3. Furthermore, the University is required to refer concerns to the Local Area Designated Officer (LADO) at the Local Authority, where it is alleged that a person who works/volunteers with children has:
- Behaved in a way that has harmed, or may have harmed, a child;
  - Possibly committed a criminal offence against children, or related to a child;
  - Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.
- 6.1.4. The role of the LADO is to provide advice, guidance and help to determine appropriate action that needs to be taken. The LADO also helps co-ordinate information sharing with the right people and will monitor and track any investigation, with the aim to resolve it as quickly as possible.
- 6.1.5. Referrals to the LADO will be made by a member of staff detailed in section 6.3. of the Safeguarding Vulnerable Groups Policy at the earliest opportunity and within 24 hours. This is in line with Nottingham and Nottinghamshire Safeguarding Children's Board interagency guidance.

## **6.2. Referrals to the Local Authority – Vulnerable Adults**

- 6.2.1. The University is required to refer concerns regarding vulnerable adults to the Local Authority where there are concerns that a vulnerable adult:
- Has been significantly harmed, abused or neglected; or
  - Is being significantly harmed, abused or neglected; or
  - Is at risk of being significantly harmed, abused or neglected.
- 6.2.2. In line with national guidance, the University will seek the consent of vulnerable adults prior to a referral taking place, unless it should be deemed that:
- The vulnerable adult is unable to provide informed consent in line with the Mental Capacity Act 2005; or
  - There is overriding public interest e.g. other people could be at risk; a possible crime has been committed; risk to health and safety of others.

### **6.3. Referrals to the Police**

- 6.3.1. The University may be required to refer information to the Police where there is overriding public interest e.g. other people could be at risk; a possible crime has been committed; risk to health and safety of others;
- 6.3.2. In certain circumstances, the University may be required to provide information or data following a formal request from The Police. Further guidance regarding the release of information to The Police can be found in Appendix A of the Data Protection Corporate Guidelines for Staff.

### **6.4. Referrals to Channel and Prevent**

- 6.4.1. Where there are concerns that an individual may be at risk of radicalisation or involved in extremist or terrorist activity, the University may be required to make a referral to the Nottinghamshire Police Prevent Delivery team and/or the Department for Business, Innovation and Skills (BIS) Regional Prevent Coordinator.
- 6.4.2. It is not expected that academic or professional services staff not designated in the Safeguarding Vulnerable Groups policy will make referrals through Prevent. **Referrals will only be carried out by the named contacts detailed in section 6.3 of the Safeguarding Vulnerable Groups policy.**
- 6.4.3. Decisions regarding referral of information are undertaken on a case-by-case basis assessment which considers whether the informed consent of the individual can be obtained and the proposed sharing being necessary, proportionate and lawful.
- 6.4.4. Any sharing of personal or sensitive personal data will be considered carefully, particularly where the consent of the individual is not to be obtained.
- 6.4.5. Further information regarding 'Prevent', 'Channel' and the duty to refer can be found in HM Government documents 'Prevent Duty Guidance: for England and Wales' and 'Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism'.

### **6.5. Referrals to the Independent Safeguarding Authority (ISA)**

- 6.5.1. The University is required to make a referral to the ISA where a member of staff or student involved in work, placements or volunteering, with children or vulnerable adults, has resigned, been dismissed or has not been appointed because they have either:
- Been engaged in 'relevant conduct' (action or inaction that has harmed or placed a child/vulnerable adult at risk of harm);
  - Satisfied the 'harm test'. To satisfy this test there needs to be credible, tangible, evidence (not just a 'feeling') that the staff member represents a risk of harm to children/vulnerable adults, although actual misconduct may not have occurred;
  - Received a caution or conviction for a 'relevant offence' (a list of these offences can be obtained from the DBS website at [www.gov.uk/dbs](http://www.gov.uk/dbs), or advice can be obtained from the helpline on 01325 953795).
- 6.5.2. Referrals to the ISA will be made by the Lead Designated Safeguarding Officer (wherever this is practical), as soon as it becomes known and within one month of the decision.

### **6.6. Referrals to Professional Bodies**

- 6.6.1. Students on some programmes (e.g. in Law, Education, Social Work) and some members of staff, are required to be registered with or accredited by professional bodies, which impose their own professional standards or fitness-to-practice regulations.
- 6.6.2. Where conduct of a student or staff member is in contravention of these professional standards or fitness-to-practice regulations, the University may be required to refer relevant information to the professional body, who may undertake their own disciplinary action.

## **7.0 STAFF OR STUDENT DISCIPLINARY ACTION**

- 7.0.1. Where concerns or allegations against staff members warrant it, action may be taken on a case-by-case basis in line with the NTU staff disciplinary policy.
- 7.0.2. Where concerns or allegations against students warrant it, action may be taken on a case-by-case basis in line with the NTU student code of behaviour.
- 7.0.3. Where disciplinary action is taken, the member of staff or student in question will be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is a valid objection by the Local Authority, The Police or other relevant statutory body. The individual is advised to contact their trade union representative or NUS representative, if they have one, or a colleague, for support. Should other support be available through the University or NTSU, the individual will be made aware of this.
- 7.0.4. Where concerns or allegations are being investigated by The Police and/or Local Authority, any disciplinary action by the University may be suspended pending the outcome of those investigations.
- 7.0.5. Where a staff member or student is registered with a professional body who implements their own standards or fitness-to-practice, the individual may be subject to separate disciplinary action by that organisation. For avoidance of doubt, the Safeguarding Vulnerable Groups Policy and this guidance is complementary to, and does not replace, those standards and regulations or professional misconduct policies.
- 7.0.6. The Staff Code of Conduct for Vulnerable Groups can be found towards the end of this document.

## **8.0 RECORDING AND STORING INFORMATION**

- 8.0.1. Where there are concerns about the welfare of a child or vulnerable adult, it is vitally important to record all relevant details, regardless of whether or not the concerns are shared with either the police or children's social care.
- 8.0.2. An exemplar form for the recording of concerns can be found towards the rear of this document.
- 8.0.3. Records should be stored in a manner consistent with the University's policies and regulations on Data Protection and Computer Use corporate guidelines for staff. Key information for the storage of records includes:
  - Information about concerns, allegations, and referrals should not be kept in one 'concern log'. Information or items relating to individuals should be kept in separate files;
  - Physical files containing sensitive or confidential data should be locked away and access to the keys strictly controlled;

- Access to those records needs to be limited to people in named roles who either need to know about the information in those records and/or who manage the records/files;
  - If records are stored electronically they should be password-protected, with access limited to appropriate staff. Electronic records should be stored on University network drives wherever possible. This ensures that data is secure and backed-up on a regular basis;
  - If records are stored on portable devices such as laptops or memory sticks, which may be removed from University premises, these must be encrypted.
- 8.0.4. In line with Local Authority guidance, records of allegations must be retained until the subject of the allegation reaches normal retirement age, or 10 years from the date of the allegation if that is longer. Records relating to allegations which are found to be without substance must also be retained in the same manner. Accurate record keeping and retention will allow for patterns of behaviour which may pose a risk to children to be identified.
- 8.0.5. For staff, records of allegations will be retained by Human Resources and where appropriate, an appointed Designated Safeguarding Officer.
- 8.0.6. For students, records of allegations will be retained by an appointed Designated Safeguarding Officer.

## **9.0 USE OF PHOTOGRAPHY, VIDEOS AND OTHER CREATIVE ARTS**

- 9.1. Still and moving images and sound recordings that feature identifiable individuals contain the personal data of those individuals. Where the University captures a person's image by recording/photography the University is the Data Controller for the personal data and the use of that image/recording is subject to the Data Protection Act 1998.
- 9.2. Where the University takes still/moving images ("images") at an event attended by children (under 18 year olds) or vulnerable people, consideration should be taken about why such images are being recorded, for example, promotional, journalistic and archival purposes.
- 9.3. Images taken during an event which are general views of the campus/classroom where the image represents an unposed record of the event and those people within the images are incidental, formal consent is not required as long as attendees have been informed that general photography/filming will be taking place at the event (provided through pre-event information) and there are clearly visible notices displayed at the event to inform people that filming is taking place in the area.
- 9.4. Where general images are recorded, individuals should be informed of the use of those images and given the opportunity to move out of the picture or inform the event organiser that they do not wish their image (or that of their child, in the case of parent whose child is attending an event) to be recorded at the event.
- 9.5. Where images are taken of an event where an activity is taking place, it is important to focus on the activity and not to focus the image on individual people/children.
- 9.6. Recording of images should avoid one to one situations where this is possible unless individual consent has been received.
- 9.7. Where the media will be present at an event organised by the University, pre-event information should clearly state that this is the case. The media should be encouraged to focus on the activities at the event rather than individual attendees and to take

general views of the event. The photographer must make themselves known to the event organiser and confirm ID before being allowed to record images.

## **9.8. Individual Consent**

- 9.8.1. Where there is a requirement to record images at an event on a one-to-one basis or of small identifiable groups, consent should be obtained. For children under the age of 16 this consent should be obtained from their parent/guardian.
- 9.8.2. For children aged 16-17 years and vulnerable adults, consent may be sought from the individual where it is believed they can provide informed consent. The decision as to whether an individual can provide informed consent may be influenced by their ability to understand the purpose of the request and of the event. Where an attendee is unable to provide their consent consideration should be given to obtaining consent from their legal guardian and/or whether images should not be recorded.
- 9.8.3. Where consent is required for an event, please see the sample consent forms at the back of this document.

## **9.9. Consent from visiting groups**

- 9.9.1. Where there is a visit to the University by a group of children/vulnerable adults arranged by an external organisation (e.g. school) and it is impractical for the University to secure consent directly from the parents/guardians, it may be acceptable to ask the external organisation to provide formal confirmation that they hold the necessary consent to cover the individuals within the group. In such cases, staff should ensure that evidence of such consent is received and is acceptable to the University for the event/visit in question and should include evidence where consent has been declined to enable recording of images to be managed at the event/visit.

## **9.10. Parents/Guardians recording images of their child**

- 9.10.1. Parents/guardians are at liberty to record images of their own children/family members for their own private family use. However, parents should be sensitive to prevent inappropriate recording of images. Where any recording of images by parents/guardians causes concern, this should be brought to the attention of the event organiser or representative of the visiting organisation.
- 9.10.2. Children/vulnerable adults may wish to record images of each other when participating in an event. Children should be discouraged from recording inappropriate images of each other (e.g. where they are dressed inappropriately). The responsibility for monitoring use of any image-recording equipment owned by a child/vulnerable adult rests with the person(s) supervising them. Any incidents that give cause for concern should be brought to the attention of the supervising person(s).

## **9.11. Storing of Images**

- 9.11.1. Images of children/vulnerable adults should be stored in a secure location under appropriate access controls with access to authorised persons only.
- 9.11.2. Images should be reviewed periodically to determine whether they should be retained or destroyed.

## **9.12. Use of Existing Images**

- 9.12.1. It is important that attendees are informed of why their image is being recorded. Images recorded for a particular purpose(s) should not be used for any other purpose.

Before using an existing image of a child/vulnerable adult, staff should check consent restrictions applicable to that image. Where any doubt exists about the image or consent then that image should not be used.

## **10.0 VISITS TO NTU**

### **10.1. Background**

- 10.1.1. Every year a significant number of children and vulnerable adults visit the University's campuses. The University has a 'duty of care', so far as reasonably practicable, to ensure the health, safety and welfare of people, while they are on our premises or affected by our activities.
- 10.1.2. When planning events or activities to be attended by children or vulnerable adults, it is important that you due consideration is given to the practicalities of the visit so that it runs as smoothly and safely as possible.
- 10.1.3. Where events involve presentations, discussion or debate regarding potentially sensitive, controversial or complex subject matter, careful consideration must be given to the appropriateness of allowing attendance of vulnerable groups. This may be particularly relevant where events are aimed primarily at adults, but there is the possibility of children attending e.g. children accompanying NTU students, staff or visitors. Where this is the case, the final decision regarding attendance of vulnerable groups rests with the Strategic Lead for Safeguarding and/or Head of the NTSU. In such situations, decisions will be made on a case-by-case basis taking into account the principles laid out in the Universities UK document 'External Speakers in Higher Education'. Other relevant guidance, statutory responsibilities and principles of law will be taken into account as necessary.

### **10.2. Risk assessments**

- 10.2.1. Risk assessments should be completed for activities involving children or vulnerable adults visiting NTU. Guidelines are available on the Occupational Health, Safety and Wellbeing section of the NTU Web site.
- 10.2.2. When undertaking risk assessments, for activities, you should take into account applicable NTU policies and procedures, any applicable legal requirements and factors such as:
  - The age and understanding level of visitors;
  - The number of visitors;
  - Presence of visitors with special educational needs or disabilities;
  - The type of activities to be undertaken.
- 10.2.3. Where additional risks are present, these should be reflected in your risk assessment and control measures put in place so far as is reasonably practicable.
- 10.2.4. If risks are identified as being of medium level (as defined by University policy), a judgement will need to be made on the urgency of any additional control measures to reduce the risk as low as is reasonably practicable. These control measures could be both short or longer term. The activity may continue until the control measures are implemented, but the process must be kept under review.
- 10.2.5. If risks are identified as being high, these risks cannot be tolerated under any circumstances and will require immediate action to reduce the level of risk, if this

cannot be achieved then the activity must be ceased immediately, until suitable controls are implemented, or an alternative process or method of work is adopted.

### 10.3. **Supervision of visitors**

- 10.3.1. When events or activities are being arranged with an external organisation such as a school or college, it is their responsibility to provide an adequate number of supervisors and undertake their own risk assessments for transport, supervision etc.
  - 10.3.2. Ratios of supervisors to participants are a risk management issue, and should be determined through the process of risk assessment. It is not possible to set definitive staff/student ratios for a particular age group or activity.
  - 10.3.3. As a starting point, supervision ratios where the activity is relatively straight forward and the group has no special requirements have previously been recommended by government as:
    - School years 1 - 3, 1:6;
    - School years 4 - 6, 1:10/15;
    - School years 7 onwards, 1:15/20.
  - 10.3.4. Without special safeguards or control measures, these ratios will not be adequate to meet the needs of most residential or more complex visits. A useful framework for assessing requirements for ratios and effective supervision is SAGED:
    - Staffing requirements – trained? experienced? competent? ratios?;
    - Activity characteristics – specialist? insurance issues? licensable?;
    - Group characteristics – prior experience? ability? behaviour? special and medical needs?;
    - Environmental conditions – like last time? impact of weather? water levels?;
    - Distance from support mechanisms in place at the home base – transport? residential?
  - 10.3.5. For events or activities where individuals are visiting the University independently of outside organisations, such as on open days, interviews, post-16 visits etc, NTU still has a duty to ensure the health, safety and welfare of people so far as reasonably practicable.
  - 10.3.6. The actual requirements for supervision will vary greatly depending upon the risk factors identified through the risk assessment process, the types of activities undertaken, whether individuals are attending a publically accessible event and so on.
- ### 10.4. **Pre-visit information**
- 10.4.1. When hosting/organising events it is important that staff provide visitors with core information about the visit to the University, as well as requesting simple information that will assist you in your duties assessing risks.
  - 10.4.2. As a matter of course you should provide external institutions with the following information in advance of the visit:
    - Pre-event University contact details, and if different, contact details for the day of the event;

- Arrival/departure times;
  - Drop off/collection points;
  - Other useful information such as travel information, campus maps etc.
- 10.4.3. You should be aware that some organisations such as schools/colleges, might ask to see University documents such as risk assessments for University provided activities and proof of public liability insurance, as part of their planning for the visit.
- 10.4.4. Staff should also seek information from the external organisation as part of planning and risk management, which may include:
- The name(s) of group leader(s) and their contact details;
  - The number expected in the group;
  - Details of any special dietary requirements, where catering is provided;
  - Details of any medical conditions and physical or learning disabilities that could potentially affect a group member's own safety or that of others whilst on campus;
  - Information about any other special arrangements needed for members of the group;
  - Organisation contact details in the event of an emergency during the visit.
- 10.4.5. Where events are organised directly with visitors to the University and no external organisations are involved (or will not be involved on the day), you should consider the information you provide to individuals and request information from them, in a similar manner. Where events involve residential content, you may also wish to consider providing information to parents/carers.
- 10.5. **Information provided during the visit**
- 10.5.1. Depending upon the type of event/activity you should ensure that you make visitors aware of simple housekeeping points, which may vary in depth dependent upon the type of visit you are undertaking. This could be communicated verbally, with appropriate signage or in a handout. Suggested points include:
- Schedule / itinerary for visit.
  - Any significant risks associated with the visit e.g. campus building work, work with animals etc.
  - First aid arrangements.
  - Fire safety and evacuation arrangements.
  - Location of toilet and welfare facilities.
  - Lost person procedure – e.g. possibly inform pupils to either return to the meeting room or seek advice from a reception/security officer.
- 10.5.2. Where events are more complex or involve a residential element, you will need to tailor your approach accordingly.
- 10.5.3. All staff and students supporting the visit should also be aware of this information.
- 10.6. **Additional information for residential events**



- 10.6.1. Vulnerable groups staying on a residential visit must be split in terms of gender for sleeping arrangements. For example, if using Halls of Residence with shared communal areas, it is better to have male areas and female areas, rather than mixed areas.
- 10.6.2. You should ensure that supervision is available throughout the night. This may not necessarily mean staff being awake throughout the night, but staff should be on hand to supervise should any incident occur. Visitors should also be made aware of where staff can be located should they require assistance.
- 10.6.3. Where practical in accommodation with shared communal areas, a member of staff, a volunteer or a formally recruited student who has received a satisfactory DBS Enhanced Disclosure should be present in each flat throughout the night.
- 10.6.4. Vulnerable groups involved in residential visits should be made aware of the expected behaviour and practical arrangements, which would be in addition to the expected guidance for day visits. Aspects that you may like to raise include:
- Any procedures for luggage storage and personal belongings;
  - Where emergency exits are located for each hall/flat/room and where visitors should assemble in the event of an emergency;
  - What visitors may and may not make use of in the accommodation e.g. if there are cooking facilities present, unless specific risk assessments have been carried out and supervision is on hand, visitors should not use this equipment;
  - Whether there are any restriction as to what they can and can't do whilst in the halls/flats/rooms e.g. use of TV's, use of personal items etc.;
  - What time visitors are expected to be in their rooms;
  - What time visitors are expected to be ready in the morning;
  - What is unacceptable behaviour e.g. swapping of rooms and moving into other visitors' rooms during the night, are not acceptable;
  - General respect of their environment is expected e.g. leaving the halls/flats/rooms in a clean and tidy manner;
  - Who should be informed in the event of an incident involving pupils, or if for example, items or furnishings are damaged.

## 10.7. **External visitors using University facilities**

- 10.7.1. There are likely to be numerous occasions where external visitors make use of University facilities, but are not doing so as a result of specific University organised activities. These activities can be loosely categorised into:
- Visitors using publically accessible areas of the University such as cafés, shops, public rights of way and other general access areas not requiring approved access;
  - Visitors using non-publically accessible areas of the University which require approval or booking prior to access, such as use of teaching facilities, sports and lifestyle facilities or areas of the estate with restricted access.
- 10.7.2. Where organised groups of visitors (rather than individuals) are using non-publically accessible areas of the University which require approval or booking, the University

representative confirming the approval or booking should make the organisation aware that they are advised to:

- Have their own public liability insurance to cover the activities they are undertaking. University public liability insurance covers only those incidents, which arise from proven fault or negligence by the University. It does not cover fault or negligence by external providers or visitors.
- Undertake appropriate risk assessments for activities they intend to undertake.
- Have appropriate levels of supervision for the activities they intend to undertake and have supervisors who have the necessary skills and knowledge to fulfil this role.

10.7.3. Furthermore, visitors should be made aware that they should not access areas of the University estate for which they do not have permission.

10.7.4. The University staff member confirming the approval or booking does not need to see evidence that these actions have been undertaken, if they are confident that these actions have been clearly communicated and have no reason to doubt their implementation.

10.7.5. An information leaflet for general visitors can be found towards the end of this document.

#### 10.8. **Specific requirements**

10.8.1. In certain circumstances, it may be necessary to consider additional or amended requirements for visitors to the University, where guidance detailed previously does not fully address needs. For example, Library and Learning Resources have specific guidance relating to walk-in visitor use of Library resources, Associate Reader Status and so on.

10.8.2. In circumstances where further guidance is required, please contact the lead Designated Safeguarding Officer detailed in the Safeguarding Vulnerable Groups Policy, one of the University Designated Safeguarding Officers and/or your Departmental Safety Coordinator.

#### 10.9. **Useful documents**

10.9.1. The annex contains documents that may be useful for staff in the event of planning visits to the University. These documents can be adapted to meet the needs of the event:

- Staff checklist
- Information for organisations visiting NTU

# Staff Code of Conduct for Safeguarding Vulnerable Groups

Nottingham Trent University organises a wide range of events and activities for, or involving, children or vulnerable adults. Each year, thousands of individuals in the region take part in our outreach programmes and University Open Days, which attract people from across the country. Some research projects and professional training programmes necessitate NTU staff or students working with these vulnerable groups and, every year, a number of the University's students are themselves classified as vulnerable. Our facilities are also occasionally used by other organisations for events involving vulnerable groups.

In all these activities and situations, the University considers the welfare of these groups to be paramount: we are committed to practice that is safe and protects individuals from harm.

Some University staff, students and contractors spend a significant amount of time engaged in activities with vulnerable groups. However, anyone may, in the course of their business at the University, have incidental contact with vulnerable groups. No matter how limited or infrequent this may be, everyone has a responsibility to behave in ways that are appropriate when with, or in the vicinity of, children or vulnerable adults.

This Code of Conduct has been designed to protect vulnerable groups and also you, as a member of University staff, as a student or as another adult currently on University premises.

## **The University expects that you will:**

- Put the welfare of children or vulnerable adults first in any situation
- Act in accordance with this code and with any more specific guidance or training that you may receive from the University
- Treat children and vulnerable adults with respect and fairness, while also being alert to any potential harm
- Avoid situations in which you are alone with a child or vulnerable adult where possible
- Be aware that physical contact with a child or vulnerable adults, however well-intentioned, may be misinterpreted
- Report concerns, unacceptable behaviour and allegations or suspicions of abuse to one of the University's Safeguarding Officers for children or Student Support Services for vulnerable adults
- Remember that representatives of the University serve as role models and must act in a responsible manner.

## **Sexual Relationships**

You should never enter into a sexual relationship with a vulnerable adult to whom you are in a position of trust, even if they give their consent.

In addition to these University expectations, you are reminded that it is a criminal offence for a person to engage in a sexual relationship with anyone under the age of 18 in relation to who they are in a position of trust, irrespective of whether the relationship is consensual.

The University interprets this to include all children with whom staff, students and contractors may come into contact through their role or through University activities or while on University premises.

# Example form for recording safeguarding concerns

Example form for recording safeguarding concerns:

Name of individual of concern:

Address:

Postcode:

Telephone:

Organisation:

Is the child/vulnerable adult aware of a possible referral?

Yes  No

Comments:

Reason for concern:

Other relevant info:

**Individuals spoken with and what was said:**

**Action taken and when:**

**For children:**

<b>Main carer(s) Name</b>	<b>Relationship to individual</b>	<b>Address</b>	<b>Telephone</b>

Is the main carer aware of a possible referral?

Yes  No

**Comments:**

**Signed:**

**Print name:**

**Position:**

**Date:**

# Parent/carer pre-16 consent form: Photography, videos and other creative arts

Dear parent/guardian/carer

Your child is due to visit Nottingham Trent University (NTU) as part of EVENT X (organised in conjunction with their school/college\*delete if not applicable).

During the visit to NTU, images of activities may be taken to help us record and publicise successful events and activities. The images may be:

- used by the University in its marketing, publicity and promotional activities and materials (in print and on the web)
- used by the University for teaching and learning purposes
- shared with your child's school/college/visiting group
- used by media agencies e.g. local newspapers

When recording of images is undertaken, children will only be named if there is a particular reason to do so (e.g. to accompany a press article about their personal involvement in a successful event or activity) and home addresses will never be given out. Images that may cause embarrassment or distress will **not** be used, nor will images be associated with material on sensitive issues.

To comply with the Data Protection Act 1998, we need your permission before NTU can photograph or make other recordings of your child. Please read the following information and complete the form to confirm whether you grant the requested consent.

---

I understand that:

- staff acting on behalf of Nottingham Trent University, may take images of visitors and participants for use in displays, publicity materials and/or on web sites. These images will only be used by Nottingham Trent University and/or organisations involved in the delivery/funding of the activity in question;
- images will not be associated with sensitive or distressing issues;
- the press and media often attend university events. In giving consent, I understand that I am also consenting that the press and media may take images for their use.

Having read the above information, do you consent to photographs and other images to be taken and used for the purposes described? (Please tick the appropriate box)

**Yes**, I give consent for images to be taken and used.

**No**, I do not give my permission for images taken and used.

Name of child:

---

Name of parent/guardian/carer:

---

Relationship to child:

---

Signature of parent/guardian/carer:

---

Date of signing (DD/MM/YY):

---

# Post-16 student consent form: Photography, videos and other creative arts

Dear student

You are due to visit Nottingham Trent University (NTU) as part of EVENT X.

During the visit to NTU, images of activities may be taken to help us record and publicise successful events and activities. The images may be:

- used by the University in its marketing, publicity and promotional activities and materials (in print and on the web)
- used by the University for teaching and learning purposes
- shared with your school/college/visiting group
- used by media agencies e.g. local newspapers

When recording of images is undertaken, you will only be named if there is a particular reason to do so (e.g. to accompany a press article about your participation in a successful event or activity) and your home addresses will never be given out. Images that may cause embarrassment or distress will **not** be used, nor will images be associated with material on sensitive issues.

To comply with the Data Protection Act 1998, we need your permission before NTU can photograph or make other recordings of your child. Please read the following information and complete the form to confirm whether you grant the requested consent.

---

I understand that:

- staff acting on behalf of Nottingham Trent University, may take images of visitors and participants for use in displays, publicity materials and/or on web sites. These images will only be used by Nottingham Trent University and/or organisations involved in the delivery/funding of the activity in question;
- images will not be associated with sensitive or distressing issues;
- the press and media often attend University events. In giving consent, I understand that I am also consenting that the press and media may take images for their use.

Having read the above information, do you consent to photographs and other images to be taken and used for the purposes described? (Please tick the appropriate box)

**Yes**, I give consent for images to be taken and used.

**No**, I do not give my permission for images taken and used.

Name of student:

---

Signature:

---

Date of signing  
(DD/MM/YY):

---

## Third-party consent form: Photography, videos and other creative arts

During your organisation's interactions with Nottingham Trent University (NTU), photographs, videos or other images of activities may be taken to help us record and publicise successful events and activities. The images may be:

- used by the University in its marketing, publicity and promotional activities and materials (in print and on the web)
- used by the University for teaching and learning purposes
- shared with your school/college/visiting group
- used by media agencies e.g. local newspapers as part of local/community news reporting

When recording of images is undertaken, children will only be named if there is a particular reason to do so (e.g. to accompany a press article about a successful event or activity) and home addresses will never be given out. Images that may cause embarrassment or distress will not be used, nor will images be associated with material on sensitive issues.

To comply with the Data Protection Act 1998, we need your permission before NTU can photograph or make any recordings of children for whom you have responsibility. Please read the following information and provide the information requested, as appropriate.

---

I understand that:

- staff acting on behalf of Nottingham Trent University, may take images for use in displays, publicity materials and/or on web sites. These images will only be used by Nottingham Trent University and/or organisations involved in the delivery/ funding of the activities in question.
- images will not be associated with sensitive or distressing issues.
- the press and media often attend University events. In giving consent, I understand that any consent given will extend to the press and media taking images for community-interest reporting.

Having read the above information, do you confirm that your organisation has the appropriate consent from parents/carers as appropriate, which allows us to record images for the purposes mentioned above? (Please tick the appropriate box)

**Yes**, my organisation consent for images to be taken and used.

**No**, I do not confirm that we hold consent for images to be taken and used

Your organisation: \_\_\_\_\_

Your name: \_\_\_\_\_

Your role: \_\_\_\_\_

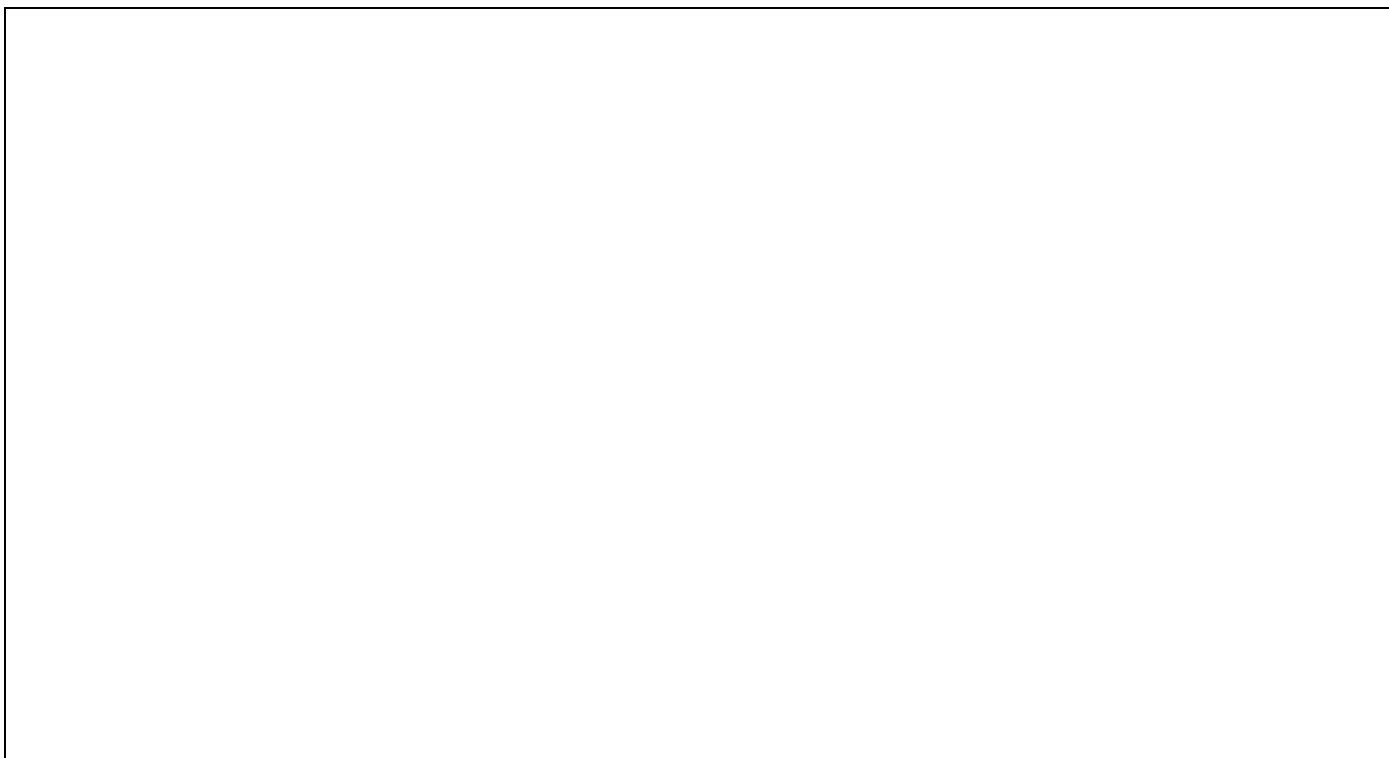
Your signature \_\_\_\_\_

Date of signature  
(DD/MM/YY): \_\_\_\_\_

Please use the rear of this form to supply details of any individuals for whom you do not hold consent, any exceptions to the consent or any special circumstances that we should be aware of e.g. vulnerable children whose images should not be captured.



## Additional Information



## Staff organised visits to The University: Information Provision Checklist

	Yes	No
NTU contact/s		
NTU Emergency number (if applicable)		
Collection / drop-off points provided		
Schedule / itinerary for visit		
Requirement for supervision		
Any significant risks associated with the visit		
First aid arrangements		
Fire safety and evacuation arrangements		
Location of toilet and welfare facilities		
Accident, incident, near-miss reporting		
Lost pupils procedure		
NTU visit risk assessment (if requested)		
Copy of NTU public liability insurance (if requested)		

## Staff organised visits to The University: Information Required

In order to ensure that we are fully prepared for your visit, we would be grateful if you could provide us with the following information:

Organisation:	
Visit date:	
Name of group leader:	
Name of school emergency contact (during visit):	
Number of pupils expected:	
Details of any medical conditions and physical or learning disabilities that could potentially affect a group member's own safety or that of others whilst on campus:	
Special Dietary Requirements (if applicable):	
Other special arrangements required:	

# Visits to NTU: Information for organisations

We are very much looking forward to welcoming you to Nottingham Trent University (NTU) for your forthcoming visit.

Whilst you are visiting us, we want to make sure that all reasonable steps have been taken to provide visitors with an enjoyable and safe time. This leaflet provides information you may find useful for arranging your visit.

## Supervision

The primary responsibility for supervision of visitors on campus lies with the visiting organisation. You should therefore ensure that an adequate number of supervisors are present for the children/vulnerable adults visiting NTU.

Supervision ratios are a risk management issue, and should be determined through the process of risk assessment. It is therefore not possible to set down definitive ratios for a particular age group or activity.

As a starting point, supervision ratios where the activity is relatively straight forward and the group has no special requirements have previously been recommended as:

- School years 1 - 3, 1:6
- School years 4 - 6, 1:10/15
- School years 7 onwards, 1:15/20

Without special safeguards or control measures, these ratios will not be adequate to meet the needs of most residential or more complex visits.

NTU expects accompanying supervisors to remain on campus at all times during the visit period.



## Risk Assessments

Although NTU has its own local risk assessments, these should not replace your own risk management procedures.

You should ensure that you follow your own organisational risk assessment policies and procedures for any visit to NTU, as well as taking account of any other relevant guidance or legal requirements.

## Public Liability Insurance

NTU holds public liability insurance, which covers incidents that arise from proven fault or negligence by NTU. This does not replace the responsibilities of outside organisations, so it is expected that organisations visiting NTU have appropriate cover in place for the types of activities they will be undertaking.

## General Information

- Copies of activity risk assessments are available upon request.
- The NTU Safeguarding Vulnerable Groups Policy can be downloaded from [www.ntu.ac.uk/safeguarding](http://www.ntu.ac.uk/safeguarding).

- First aid trained staff are available on all campuses should staff or pupils require assistance during your visit. Please note that First Aiders are not allowed to administer medication of any kind. Should any of your party require First Aid during your visit, please speak to the person leading your visit, or if this is not possible, any reception/security officer.
- In the unlikely event that anyone in your party is separated from their possessions, make the NTU member of staff leading your visit or a member of the reception/security team aware, so that they may attempt to help you recover them. Should you discover that your possessions are missing after you have left the University Campus, you should contact your visit organiser or University Security by telephoning 0115 848 2468. Please note that Nottingham Trent University can accept no liability for any possessions bought onto campus.

- If you have any concerns during your visit, please speak to the staff on the Help Desk or at NTU reception.

## About your visit

Maps of all NTU campuses, plus travel information can be viewed at [www.ntu.ac.uk/maps](http://www.ntu.ac.uk/maps)

Key information for your visit:

Visit Title:	<input type="text"/>
Visit date:	<input type="text"/>
Arrival time:	<input type="text"/>
Departure time:	<input type="text"/>
Campus:	<input type="text"/>
Drop/off collection point:	<input type="text"/>
Meeting point (if different from drop-off/collection point):	<input type="text"/>
NTU staff member leading the visit:	<input type="text"/>
Contact details for queries:	<input type="text"/>

## Introduction

Nottingham Trent University organises a wide range of events and activities for, or involving, vulnerable groups and children (those under the age of eighteen years of age).

Each year, thousands of individuals in the region take part in our outreach programmes and University Open Days, which attract people from across the country. Some research projects and professional training programmes necessitate NTU staff or students working with vulnerable groups or children and every year, a number of the University's students are themselves classified as vulnerable and/or are under the age of eighteen. Our facilities are also used by other organisations for events involving vulnerable groups and we have numerous visitors across all campuses.

In all these activities and situations, the University considers the welfare of these groups to be paramount: we are committed to practice that is safe and protects individuals from harm.

As a visitor to NTU, we ask that you read this leaflet carefully and act on any concerns that you may have.

## What is Abuse?

The government guidance 'Working Together to Safeguard Children' recognises that there are four categories of abuse relating to children:

- Neglect
- Sexual Abuse
- Emotional Abuse
- Physical Abuse

In relation to vulnerable adults (in particular), the two following categories of abuse should also be considered:

- Financial Abuse
- Discriminatory Abuse

Safeguarding is not just about protecting vulnerable groups from deliberate harm. It includes other issues such as:

- Internet safety
- Health and safety
- Meeting the needs of children with medical issues
- Bullying
- Physical intervention
- Harassment

Although it is highly unlikely, if you are approached by an individual with a concern whilst you are on campus, we ask that you:

- Listen positively to what they say and, if possible, ensure a degree of privacy whilst you are doing this.
- Take what the individual has to say seriously.
- Stay calm, however shocked you may be.
- Let the individual know that this information will have to be passed on so that they can be helped.

## You should not:

- Ask leading questions – avoid 'who, where, what' type questions.
- Appear shocked or angry.
- Make judgements
- Promise to keep this information a secret.
- Confront or question an alleged abuser- it is not your role to investigate

## Seeking support

If you require any support relating to safeguarding, there are a number of staff trained as Designated Safeguarding Officers who can offer support and guidance. Details of these staff along with the University safeguarding policy can be found at [www.ntu.ac.uk/safeguarding](http://www.ntu.ac.uk/safeguarding)

Key contacts include:

Lead Designated Safeguarding Officer  
Sarah Bustard  
Student Health & Wellbeing Manager  
Email: [sarah.bustard@ntu.ac.uk](mailto:sarah.bustard@ntu.ac.uk)  
Telephone: 0115 848 6345 (86345 internally)

Pam Ellis  
Head of Further Education  
(Brackenhurst Campus Safeguarding Officer)  
Email: [pamela.ellis@ntu.ac.uk](mailto:pamela.ellis@ntu.ac.uk)  
Telephone: 0115 848 5297 (85297 internally)

Where it is necessary, you should also contact NTU Security, to make them aware of any potential issues, where their involvement or assistance may be required:

Brackenhurst: 0115 848 5262  
City: 0115 848 2468  
Clifton: 0115 848 6600

**Whilst you are on campus, we ask that your behaviour is above reproach and that you report any circumstances that create you any concern.**

Thank you for taking the time to read this leaflet.



## Safeguarding Vulnerable Groups

Information for Visitors