Safeguarding Vulnerable Groups and Individuals Policy

Lancaster University

March 2016
This policy sets outs Lancaster University’s approach to identifying and responding to concerns regarding the safeguarding and protection of children, young people and vulnerable adults. Safeguarding their welfare as they engage with the University is part of our duty of care and all members of the University must be aware of their responsibilities in this regard.

**Context for Safeguarding in Higher Education**

The Care Quality Commission defines safeguarding as follows:

“Safeguarding means protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.”\(^1\)

Although the Higher Education Sector has not had specific duties placed on it by legislation in respect of safeguarding, institutions are considered to have an enhanced duty of care under common law to ensure that children, young people and Adults at Risk are safe and protected in all interactions with an institution. Lancaster University takes its responsibilities under this duty of care very seriously and our commitment to our applicants, students, staff, partner bodies and the community at large are defined in our Strategic Plan for 2020, People Strategy 2020 and Student Charter.\(^2\)

Lancaster University is committed to providing a safe and positive experience to all members of the University community including those attending activities and events or using its facilities. We will adopt a ‘best practice’ approach to the protection of members of vulnerable groups who are on University premises or engaging in University activities. The University intends to do this by making all reasonable efforts to reduce risk and by taking anticipatory actions to ensure that sufficient safeguards are in place to enable us to act promptly and appropriately to address any actions or activities that are identified which may place a member of a vulnerable group, or a vulnerable individual, at risk. At all points our intention is to make the welfare of the individual our priority.

Lancaster University is an adult environment and it is expected that any student or applicant will be able, with suitable adjustments in place, to function as an effective member of our inclusive University community.

This policy is complementary to and should be read in conjunction with the following which cover some safeguarding responsibilities:

- Human Resources Recruitment Guidelines (including Disclosure and Barring procedure and Lone Working)
- Bullying and Harassment Policy

\(^1\) [http://www.cqc.org.uk/content/safeguarding-people](http://www.cqc.org.uk/content/safeguarding-people)
\(^2\) [https://www.lancaster.ac.uk/strategic-plan; http://www.lancaster.ac.uk/hr/people-strategy/PeopleStrategy.html; http://www.lancaster.ac.uk/current-students/student-charter/](https://www.lancaster.ac.uk/strategic-plan; http://www.lancaster.ac.uk/hr/people-strategy/PeopleStrategy.html; http://www.lancaster.ac.uk/current-students/student-charter/)
In some instances it may be that more than one of the above policies is applicable to a situation. Where this occurs the Safeguarding Policy will take priority. The University reserves the right to consider an incident under a different policy if this will (1) be more beneficial to the individual (e.g. Fitness to Study) or (2) it is found that engagement with this policy has been malicious or vexatious in its intent (Student Disciplinary Policy). The individual concerned will be informed in writing of which Policy is being used to consider their case.

The current version of this policy will be held on the University Intranet and it is the responsibility of person using the policy to check that they are using the most up to date version and are not relying on copies saved to personal drives.

The University has provided a set of guidelines to this document (Safeguarding Guidelines) which must be used when applying this Policy as they provide detail on the types of incident (e.g. abuse against an Adult at Risk etc.) that could arise and would need to be considered.

Scope

This Policy applies to all staff, students of the University and contractors/agents engaged by the University who may come into contact with children, vulnerable groups or individuals as part of their work either on or off Bailrigg campus and at the Work Foundation, London. The exception to this will be where the University has made arrangements with a partner body where staff, students and contractors will be expected to work within the safeguarding arrangements of that institution (e.g. when undertaking volunteering activities within Schools).

The policy is also applicable to visitors to the University or volunteers working on or off University premises where, as part of their University work, this will involve contact with children or Adults at Risk.

As appropriate, we expect relevant communications with outside institutions using University premises or facilities to advise that they need to make themselves aware of this policy and their duties under it.

Definitions for this policy:

Adult at risk - A person aged 18 years or over who is or may be in need of community care services by reason of age, disability (including mental health issues) or long-term illness and is or may be unable to take care of him/herself or protect him/herself from significant harm or exploitation.
**Children** - Anyone under the age of 16 years.

**Partner body** – Any organisation or institution working with the University in partnership (either formal or informal) to provide services to vulnerable groups or individuals. Examples of such organisations would be schools or charitable providers providing services on or off campus.

**Position of Trust** – all members of staff are considered to hold a ‘position of trust’ in relation to the vulnerable groups and individuals identified in this document as they hold positions of power, authority and influence over that individual or their future due to their status as staff members and/or professional roles.

**Prevent** - Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.

**Vulnerable individual** - The definition of ‘Adult at Risk’ can be temporary if this is caused by external factors and in such cases, the University will owe a ‘duty of care’ to that individual and will work with external organisations to ensure appropriate support is in place where responsibility for providing such support lies with those organisations.

**Vulnerable Groups or individuals** – A term to combine all of the groups above for the purpose of this policy.

**Young People** – A person between 16 and 18 years old.

**Purpose**

The purpose of this document is to:

- Identify the methods by which the University will safeguard vulnerable groups and individuals;
- Set out the University’s policy with regard to the protection of vulnerable groups and individuals and how this will be achieved;
- Set out the administrative responsibilities in the event of an incident;
- Set out the University’s position on information sharing with regard to Safeguarding;
- Identify where supporting information can be found
- Set out a monitoring and review process.

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Legal Context

Lancaster University acknowledges responsibilities and an enhanced duty of care towards vulnerable groups and individuals, in particular those relating to the protection of children and Adult at Risks identified under the following (not exhaustive):

- Equality Act (2010)
- The Protections of Freedoms Act (2012)
- Counter-Terrorism and Security Act (2015)
- Code of Practice for Freedom of Speech (currently before University Council)

The University also owes a duty of care to individuals who may need support and guidance under the general ‘duty of care.’

In some cases, individuals are placed in a vulnerable situation due to the environment or the beliefs, actions or aggressions of other people. Examples of this include instances such as:

- Stalking, hate crimes or other forms of harassment
- Domestic violence
- Homelessness
- Refugees/asylum seeker status

In such cases the University will have a duty of care to work with the person concerned and relevant authorities such as Social Services or the NHS to support that individual and undertake all reasonable actions to safeguard them. The University will normally seek to work within the parameters of the Data Protection Act 1998.

In very rare instances where the University believes that the situation is such that the individual is unable to make an informed decision, confidentiality may be breached to protect that individual under our responsibilities to provide an enhanced ‘duty of care’. Where such instances occur, the relevant University Safeguarding Officer (or nominee) will take advice from relevant professional teams and consult with the University Secretariat before releasing any information.
All actions under this policy will comply wherever possible with the general principles identified by the Pan Lancashire and Cumbria Safeguarding Adults Board\(^4\) and the Pan Lancashire Policies for Safeguarding Children Manual.\(^5\)

When working with Adults at Risk, the following principles will be applied where appropriate:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - Proportionate and least intrusive response appropriate to the risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

**Policy**

The University will take all appropriate steps to safeguard vulnerable groups and individuals by:

- Providing a safe environment for all its employees, students, contractors/agents and people, including children, Young People and Adults at Risk who use its facilities;
- Ensuring that all allegations of abuse or neglect of children or vulnerable groups or individuals are appropriately reported to the relevant body where required;
- Taking active measures to identify and prevent anyone who is unsuitable to work with vulnerable groups or individuals from doing so;
- Recognising its responsibility to make staff, students and relevant partner bodies/agencies aware of their individual responsibilities to help identify and mitigate risk and to take appropriate and timely action to protect vulnerable groups and individuals;
- Ensuring that on the occasions when University facilities are used for external events that adequate and appropriate risk assessments are undertaken to ensure the safety and security of the vulnerable group including any additional arrangements required for specific individuals;
- Ensuring that due regard is given relating to any issues arising relating to the possibility of harm being caused due to Freedom of Speech being abused and taking action to mitigate or prevent such harm.

\(^4\) [http://plcsab.proceduresonline.com/chapters/p_prin_values.html](http://plcsab.proceduresonline.com/chapters/p_prin_values.html)
We will do this by:

- Ensuring that information about Safeguarding is disseminated appropriately
- Providing transparent guidance materials and ensuring that relevant training is provided where necessary;
- Working with external agencies where necessary in order to implement and monitor the activities regulated by this policy and procedure;
- Embedding current best practice guidance for the sector outlined by the government for the relevant group (e.g. the Statement of Government Policy on Adult Safeguarding) in any update or review of this policy and procedure.

Responsibilities under this policy

- **Accountable Senior Manager (University Leadership Team)** - The Vice-Chancellor. Accountability is exercised by means of recommendations from the relevant committees and management structures and authorised by the Vice-Chancellor.

- **Responsible Senior Manager** – The Chief Administrative Officer is responsible for the Professional Service Departments detailed in this policy.

- **Lead Department (Students)** – The Department of Student Based Services will take the lead on this policy and will hold decision making authority relating to the application of this Policy.

- **Lead Department (Staff)** – Human Resources will take the lead on this policy where it relates to staff and will hold decision making authority relating to the application of this policy.

- **University Safeguarding Officer – Staff (Strategy and Compliance)** - role held by the Director of Human Resources. This role is responsible for:
  - setting the direction for the University’s safeguarding practice for staff;
  - ensuring institutional compliance;
  - holding decision making authority on the application of this policy;
  - promoting and championing safeguarding to ensure that it is prioritised at a senior level within in the institution;
  - Ensuring effective monitoring and review by ensuring:

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• Policy and good practice is reviewed on an annual basis for minor changes;
• that major changes are taken to CSEC as required to take account of new legislation or duties or existing legislation is updated;
• Ensuring that the policy and procedures will be reviewed in light of the effectiveness and appropriateness of action taken to deal with the incident.

• **University Safeguarding Officer – Students and Applicants (Strategy and Compliance)** - role held by the Director of Student Based Services. This role is responsible for:
  o setting the direction for the University’s safeguarding practice in respect of students;
  o ensuring institutional compliance;
  o holding decision making authority on the application of this policy;
  o promoting and championing safeguarding to ensure that it is prioritised at a senior level within the institution;
  o Ensuring effective monitoring and review by ensuring:
    ▪ Policy and good practice is reviewed on an annual basis for minor changes;
    ▪ that major changes are taken to CSEC as required to take account of new legislation or duties or existing legislation is updated;
    ▪ Ensuring that the policy and procedures will be reviewed in light of the effectiveness and appropriateness of action taken to deal with the incident.

• **Deputy Safeguarding Officer for Staff (operations)** – Role held by the Assistant Director of Human Resources (Operations). This role is responsible for:
  o the implementation and operational review of this policy;
  o acting as the main contact within the University on safeguarding issues (except Prevent);
  o acting as the lead liaison with external agencies except Prevent;
  o Working with the Director of Student Based Services and the Director of HR where appropriate to deal with issues arising;
  o making minor changes to Policy wording and content to ensure that the policy is always current. Such changes will be reported to the relevant committee(s). Major changes to the Policy, such as significant content changes, changes to responsibilities, policy application or changes resulting from new legislation, must be approved directly by the Professional Services Leadership Team.
  o Ensuring that the supporting guidance materials are current.

• **Deputy Safeguarding Officer for Students and Applicants (Operations)** – Role held by the Head of Student Wellbeing Services. This role is responsible for:
  o the implementation and operational review of this policy;
acting as the main contact within the University on safeguarding issues (except Prevent);
acting as the lead liaison with external agencies except Prevent.
Working with the Director of Student Based Services and the Director of HR where appropriate to deal with issues arising;
making minor changes to Policy wording and content to ensure that the policy is always current. Such changes will be reported to the relevant committee(s). Major changes to the Policy, such as significant content changes, changes to responsibilities, policy application or changes resulting from new legislation, must be approved directly by the Professional Services Leadership Team.
Ensuring that the supporting guidance materials are current.

- **Prevent Safeguarding Officer** – role held by Emergency Planning and Risk Manager. This role is responsible for all activities relating to the operation of the Prevent Strategy.

- **Faculty Deans/Directors of Service** – responsibility for nominating Lead Safeguarding Officers and for ensuring compliance with this policy across their areas.

- **Lead Safeguarding Officer** – role given locally to the institutional lead for departmental/course safeguarding or lead or events/activity organiser (as nominated by the relevant Dean or Director of Service). This role is responsible for liaising with partner bodies to co-ordinate activities under the Policy and define the local arrangements for investigations and points of escalations as required. The role will also hold responsibility for ensuring that any visitors or volunteers are aware of their duties under this policy.

- **College Principals** – are responsible for ensuring that their staff are aware of and compliant with this policy.

- **All staff** – to ensure that they are aware of and compliant with the Policy and relevant Guidance notes, particularly how to use the reporting structure and with regard to making any invited visitors aware of their responsibilities under this policy.

- **All students** – to ensure that they are aware of and complaint with the Policy and relevant Guidance notes

- **All invited visitors or voluntary staff** (paid or unpaid) – are responsible for ensuring that they are aware of and complaint with the Policy and Guidance notes.
Monitoring and reporting

- The Deputy Safeguarding Officers (Operations) are responsible for the implementation and operational review of this Policy.
- A joint report will be provided on the outcomes of activity under this policy on an annual basis to be considered at the Professional Services Leadership Team and provided for information to other relevant committees.
- The Policy will be reviewed by the Professional Services Leadership Team after 1 year in the first instance and then subsequently every 3 years or after the introduction of a major legislative or other change in our duties, whichever is the earlier.

Staff responsibilities

All University staff (including partner body/agency staff) and volunteers working on behalf of the University are regarded as being in a **position of trust**, in particular those who teach, support, guide or in any way interact with students. It is important that all staff are aware of this Policy (and related policies identified above) and its supporting guidelines and act accordingly at all times.

Staff should ensure that they are aware of the members of vulnerable groups under their care so that they may take appropriate action. This also applies to interview situations where a chaperone may be needed or arrangements made for meetings to be held in an open area.

All staff are expected to take responsibility for ensuring that they have relevant training to fulfil their responsibilities under this policy. Staff should discuss this with their relevant line manager if unsure.

Any staff member made aware of suspicions, allegations or actual abuse of a child, Young Person or Adult at Risk (including allegations against staff) **is responsible for taking the appropriate action according to this procedure.**

Staff should never try to deal with a suspicion, allegation or actual incident of abuse themselves. It may be appropriate to consult other relevant professionals or adults working with the young person for additional information related to the concerns raised by/about the young person. A process for this may be identified as part of the local investigation procedure for the activity in which you are involved.

Although comprehensive guidance is provided in the **Safeguarding Vulnerable Groups and Individuals Guidelines**, staff should never be afraid to ask for appropriate advice and guidance if they are unsure of what action to take. Confidential advice can be given by the relevant Deputy Safeguarding Officer (Operations) or the Planning and Risk Manager (in respect of incidents arising under Prevent). This advice can be given confidentially without identifying the
individual concern if staff members need to establish whether a report should be made.

**Children on campus**

The responsibility for the safety of any child brought onto campus lies with the parent/guardian. The parent/guardian will also be responsible for:

- Ensuring that University policies are followed at all times (e.g. Data Protection);
- The cost of any damages caused by the child.

Where issues arise relating to the safety of a child who is residing in University Residences with its parents, the University will contact Lancashire County Council Social Services for guidance in line with Procedure 4 below.

**Breaches of the policy and appeals**

Should a student or member of staff be found to be in breach of this policy and its related procedures the University will investigate the matter and take action as necessary through relevant student or staff disciplinary procedures.

As with all policies, an individual has the right of appeal. Appeals will be considered where the individual can evidence that:

- They were prejudiced by a failure of the University’s officers to follow the procedures as set out below or by a breach of the requirements of natural justice;
- exceptionally, substantial new evidence, not previously available to the panel, is identified.

An intention to appeal by the staff member or student must be submitted to the nominated senior officer (as will be provided in writing) within 10 working days of receipt of the outcome. A timeframe for production of evidence will then be agreed between the nominated senior officer and the member of staff or student.

If valid procedural grounds have been determined then the Responsible Senior Manager (or nominated representative) will consider the appeal.

The decision of the Responsible Senior Manager (or nominated representative) will be final and will consist of one of the following decisions:

- the confirmation of the original decision;
- the referral back to an earlier level of the process (if the process has not been followed or if new evidence is made available).
Procedures

1. Student Admission Procedure

This procedure is currently under review but will include an appropriate section relating to safeguarding activities for young people who are allowed to enroll on a course of study. This will be incorporated into the University's Manual of General Regulations and Procedures.

2. Staff recruitment and DBS checks

Please refer to the Human Resources Recruitment Guidelines which provide detailed information regarding the operation of these policies including the:

- Disclosure and Barring procedure
- Lone Working procedure
- Health and Safety Policy
- Equality and Diversity Policy
- Relations between Staff and Students Policy
- Whistleblowing Policy

3. Procedure for recruiting staff (including student staff) or student volunteers

Where volunteers are entering into regular unsupervised contact with groups protected by this policy, they will normally be required to obtain a DBS check for the work they will be undertaking (please note staff who have DBS certificates will need to have these checked to ensure that they cover the type of work they will be undertaking as a volunteer. It should not be assumed that the DBS covers everything). Where a current volunteer wishes to move from supervised to unsupervised contact, a DBS check must be obtained before this work commences. It is the responsibility of the LSO to ensure that any person moving from supervised to unsupervised work has an up to date DBS check.

Where a DBS check discloses a previous conviction the following actions should be taken:

- If a check discloses a previous conviction that makes them unsuitable to work with children or young people according to the DBS "Relevant Offences Factsheet" they will immediately be told they cannot continue to work with their department and will no longer be able to work with children, young people or vulnerable adults at Lancaster University.

- Should the check reveal a previous conviction that is not on the "relevant offences factsheet" it is the partner body’s decision as to whether they are willing to accept the student based on the information provided in the check. If
they are not willing to accept the student the school must communicate this to the student and the relevant department. The student may be able to volunteer on other activities.

- If a student is convicted of a crime during their time at University they must inform their department in writing detailing what has happened. Depending on the above criteria, the student may have to suspend their work until a new DBS certificate is received. The above will be followed regarding communicating the information to the school and further decisions concerning their continued employment.

4. Response to a suspicion or allegation of abuse relating to a vulnerable group or individual

Information on what constitutes abuse and guidance on how to interact and support the individual concerned is provided in the Vulnerable Groups and Individuals Guidance Notes.

Actions

1. The incident should be reported immediately to the Lead Safeguarding Officer (for the activity, event or course etc.) who will help you to record the allegation/incident appropriately on the Vulnerable Groups and Individuals Incident Report form. All details must be recorded. In the event that the LSO is not available do not delay in reporting the incident/event, confidential advice can be given by the relevant Deputy Safeguarding Officer (Operations) or the Planning and Risk Manager (in respect of incidents arising under Prevent) without identifying the person.

Where an incident is identified with regard to an individual who is not involved with an activity, event or course (e.g. a child living with parents in University residence), a report should be made directly to the relevant Deputy Safeguarding Officer (Operations). See 3 below.

2. Local investigation procedures should be agreed to deal with the specific risks that could arise from activities involving vulnerable groups or individuals. Where partner bodies are involved this should be set out in the formal documentation prepared by the Lead Safeguarding Officer when organising the activity, event or course. Where the local investigation identifies an issue which needs to be escalated the process should identify at whether this should be addressed by the partner body as part of the procedures or by escalating as below where the responsibility lies with the University.

3. The Lead Safeguarding Officer will inform the relevant Deputy Safeguarding Officer (Operations) who is responsible for dealing with allegations or suspicions of abuse. Information should be reported if
there are concerns that a child or vulnerable adult may be suffering harm or be at risk from abuse, even if just suspected. The relevant Deputy Safeguarding Officer will be responsible for:

a. Undertaking appropriate investigations where necessary;

b. Making a referral to the local Children’s Social Care Services department and/or the Police where there is significant risk of harm to an individual;

c. Informing the Director of HR or Director of Student Based Services to initiate the staff or student disciplinary procedure where appropriate.

d. Ensuring that secure records are kept of all incidents and are held in accordance with the Data Protection Act and related legislation.

4. A copy of all records (including relevant documents relating to local investigations) should be made available to the relevant Deputy Safeguarding Officer (Operations) where they will be held in a secure holding space. Any records kept locally for the duration of the allegation/incident must be kept securely by the Lead Safeguarding Officer until the issue has been resolved. All documents will be kept in accordance with the University’s Data Protection Policy.

5. **Response to a suspicion or allegation of abuse or a complaint under PREVENT**

The University has responsibilities under Section 26(1) of the Counter-Terrorism and Security Act 2015 to safeguard any person who may be at risk of being adversely influenced or radicalised by any extremist group under the terms of the Government’s **Prevent Strategy**. The University will fulfil all obligations bearing in mind the guidance provided by Universities UK as follows:

"Universities must balance a wide-ranging set of responsibilities. Universities are open institutions with a legal obligation to promote and facilitate academic freedom and freedom of speech. However, these are qualified rights. However, section 31 of the Counter Terrorism and Security Act states, that in meeting the statutory duty, higher education institutions must have particular regard to the duty to ensure freedom of speech and the importance of academic freedom."\(^8\)

**Actions**

a. The incident should be reported immediately to the Lead Safeguarding Officer (for the activity, event or course etc.) who will help you to record the allegation/incident appropriately on the Vulnerable Groups and

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\(^8\)http://www.universitiesuk.ac.uk/_highereducation/Documents/2011/FreedomOfSpeechOnCampus.pdf
Individuals Incident Report form. All details must be recorded. In the event that the LSO is not available do not delay reporting the incident/event, confidential advice can be given by the University Planning and Risk Manager or the Planning and Risk Manager (in respect of incidents arising under Prevent) without identifying the person.

b. The University Planning and Risk Manager is responsible for dealing with allegations or suspicions arising under the Prevent Strategy. Information should be reported if there are concerns that person may be at risk of radicalisation, even if just suspected. The University Planning and Risk Manager will be responsible for:
   - Taking appropriate advice from professional teams, such as the Counselling and Mental Health team, to ensure that due regard is given to any issues or conditions which may affect a person’s behaviour when considering a report;
   - Making a referral to the relevant authorities where necessary;
   - Liaising with all external agencies and internal departments to facilitate support for the individual concerned;
   - Informing the Director of HR or Director of Student Based Services to initiate the staff or student disciplinary procedure where appropriate;
   - Ensuring that secure records are kept of all incidents and are held in accordance with the Data Protection Act and related legislation.

c. A copy of all records should be made available to the University Emergency Planning and Risk Manager. Any records kept locally for the duration of the allegation/incident must be kept securely by the Lead Safeguarding Officer until the issue has been resolved.

6. Procedure for arranging activities/events:

Actions:
- Permission from the relevant Dean/Director etc. will be obtained prior to arranging any activity or event. The Dean/Director will nominate a Lead Safeguarding Officer (LSO) for the activity/event who will hold responsibility for safeguarding (this may be an event organiser or course leader);
- The Lead Safeguarding Officer will ensure that relevant risk assessments are undertaken in accordance with the University’s Risk Assessment & Health and Safety Policies and other relevant local procedures;
- The risk assessment must be relevant for the group concerned and must cover the group specific areas identified in the Safeguarding Policy and Procedure Guidelines as a minimum (e.g. specific to children). Additional activity/event areas may be added to the risk assessment as identified by the LSO. The risk assessment must also ensure that any additional
reasonable adjustments under the Equality Act for individuals with disabilities are considered;

- Where an event includes public speakers reference should be made to the University’s Code of Practice on Freedom of Speech;
- The Risk Assessment must ensure that any risks arising to staff (again specific to the particular group that the staff members are working with) are identified, again taking into account any reasonable adjustments required for disabled staff;
- Where the event would involve external agencies (e.g. transport) that considerations are made to ensure the safety of any child or vulnerable person where necessary;
- The LSO will ensure that any staff/volunteers involved with the event will have the relevant DBS clearance for the group concerned in advance of the activity/event;
- The LSO will be responsible for maintaining and storing appropriate records in line with University Procedures;
- The LSO will be responsible for setting out the local investigation procedure to deal with allegations or suspicions of abuse including the necessary escalation process and responsibilities;
- Where activities/events are taking place in partner bodies where that institution will be responsible for safeguarding, the LSO (or nominee) will ensure that the institution has a suitable policy for the group concerned and has undertaken a Health and Safety Risk Assessment for the activity/event. The LSO (or nominee) will hold responsibility for obtaining a written agreement with that institution setting out the differing obligations of the institution and the University. This agreement will:
  - Provide a copy of the Safeguarding Policy to be used;
  - Identify any staff-related issues concerning regulated activities for Children or Adults. Identify which roles require DBS checks so that appropriate staff/volunteers can be assigned or recruited. (See Guidance for advice regarding regulated activities)
  - arrange for staff/volunteers to be trained on application of the relevant policy. This may involve training on both the University’s safeguarding policy and that of the partner body where both will apply. In such circumstances staff/volunteers must be made aware of the point of transfer of responsibility between University and the partner body's policies so they are aware which policy to apply and when.
  - The agreement will be signed off by the relevant Dean/Director (or nominee) for the University. This could be the LSO if that person has been given delegated authority.
7. Procedure for employment of Young Persons undertaking work experience or volunteering

Actions:
In line with our responsibilities under the Management of Health and Safety at Work Regulations 1999 it is the responsibility of any manager recruiting a Young Person under the age of 18 years to undertake employed or voluntary work to complete a risk assessment before that person takes up their position. Where risks to young people are identified formal safeguards must be put in place. It is essential that any risk assessment:

- Ensures that the work allocated is not beyond the physical or psychological capacity of the individual;
- Does not include any harmful agents (e.g. radiation)
- Does not involve extremes of heat, noise etc.

A written risk assessment shall be authorised by the Dean/Director of Professional Services of the relevant school or service before any Young Person can be contracted to undertake any of these activities in accordance with the HR policies and guidance given above.

8. Procedure for Whistleblowing/Public Interest Disclosure

Whistleblowing is an important aspect of a safeguarded institution whereby staff, student mentors and volunteers can confidentially share genuine concerns about a colleague's behaviour with a Safeguarding Officer, line manager or senior manager.

Working with vulnerable groups including children and young people places staff and volunteers in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

In accordance with the Public Interest Disclosure Act 1988, the University will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions. The Procedure for Reporting Serious Malpractice can be found here: Hyperlink http://www.lancaster.ac.uk/hr/staff-relations/files/whistle.html