



**Vice-Chancellor: Professor John Last**

**CHILD PROTECTION AND ADULT SAFEGUARDING POLICY**

**Approved by Senate: 10 February 2016**

## **1. INTRODUCTION**

### **1.1 Purpose of the policy**

- 1.1.1 The University wishes to ensure that it maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard children and vulnerable adults with whom its work brings it into contact.
- 1.1.2 This policy sets out the requirements with which University members must comply in respect of child protection and safeguarding within the work of the University.

### **1.2 Legal framework**

- 1.2.1 This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable adults, namely:
- Children Act 1989
  - United Nations Convention of the Rights of the Child 1991
  - Data Protection Act 1998
  - Sexual Offences Act 2003
  - Children Act 2004
  - Safeguarding Vulnerable Groups Act 2006
  - Protection of Freedoms Act 2012
  - Care Act 2014
  - Counter-Terrorism and Security Act 2015

### **1.3 Scope of the Policy**

- 1.3.1 This policy applies to all University members.
- 1.3.2 For the purposes of this policy the following definitions apply:
- (i) A 'child' is defined as a person under the age of 18 years (as defined in the Children Act 2004).
- (ii) A 'vulnerable adult' is defined as a person aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation (1997 Consultation "Who Decides? Issued by the Lord Chancellor's Department).
- (iii) 'University member' refers to staff, students, volunteers and governors of the University, and others approved by the University to teach on its programmes.
- 1.3.3 All incidents of alleged misconduct concerning children or vulnerable adults will be taken seriously by the University and responded to swiftly and appropriately in accordance with this Policy.
- 1.3.4 Where appropriate, breaches of this Policy and/or allegations of misconduct concerning children or vulnerable adults, and/or the abuse of children or

vulnerable adults will result in the University invoking its disciplinary procedures as appropriate.

- 1.3.5 The University cannot act 'in loco parentis' and ultimate responsibility for the safety and welfare of a child will continue to rest with parents and guardians.
- 1.3.6 While it is impossible to ensure that a child or vulnerable adult would never come to harm, the adoption of this Policy and associated guidelines aims to facilitate the management of the risk associated with the duty to protect such individuals.
- 1.3.7 All personal data will be processed by the University in accordance with the requirements of the Data Protection Act 1998.
- 1.3.8 In line with the Vetting and Barring Scheme, the University will ensure that staff working in regulated activity are checked against the ISA Register if necessary.
- 1.3.9 Regulated activity is defined as
  - (i) Any activity which involves contact with children and is of a **specified nature** (e.g. teaching, training, care supervision, advice, treatment or transport) or any activity allowing contact with children and is in a **specified place** (e.g. schools, children's homes etc), and
  - (ii) Where that activity is frequent, intensive or overnight, and
  - (iii) Where that activity is wholly or mainly the role, and not merely incidental.
- 1.3.10 Frequent and intensive for regulated activity is defined as:
  - (i) In child settings, frequent means regular, repetitive activity once a week or more; intensive means four or more days in any one 30 day period;
  - (ii) In health settings frequent means once a month or more; intensive means three or more days in any one 30 day period.
- 1.3.11 The document *Working Together to Safeguard Children, 2015* (<http://www.workingtogetheronline.co.uk/index.html>) defines 'abuse' as 'a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Full definitions are available in '**Acting on Concerns: Safeguarding guidance for NUA and NUA Students' Union staff**' which forms Appendix A of this document.
- 1.3.12 The University's Safeguarding Officer is Angela Tubb, Academic Registrar.
- 1.3.13 The University's Deputy Safeguarding Officer is Robyn Challis, Student Support Manager.

## 2. CHILD PROTECTION ARRANGEMENTS

- 2.1 The University's designated Safeguarding Officer is responsible for:
- implementing and promoting this Policy
  - ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children
  - acting as the main contact within the University for the protection of children
  - ensuring that appropriate University members are provided with information, advice and training on the protection of children
  - providing adequate information on this Policy as part of the induction process for any new University members
  - establishing and maintaining contacts with the local children's social care services, departments and police
  - maintaining confidential records of reported child abuse cases and action taken

### 2.2 Children on Campus

- 2.2.1 It is the University's policy that children under the age of 18 are not allowed into the workplace or onto University premises other than those children who are:

- (i) students on a University course
- (ii) formally attending organised events where they are the responsibility of their school or other institution, or their parent or guardian;
- (iii) attending Open Days, Taster Days or Outreach events
- (iv) undertaking a period of work experience
- (v) attending course specific activities for which prior approval has been granted (e.g. photography shoots, filming)

- 2.2.2 The University reserves the right to exclude children from some or all of its premises. In general University members should not allow their children to enter the University premises except for brief periods when they are fully under the supervision of a parent, guardian or carer.

- 2.2.3 The University requires that all children taking part in course-related activity must have parental consent to take part in the activity, and all children under the age of 16 must be accompanied by a parent, guardian or carer at all times. The procedure for seeking approval to bring an under-18 visitor onto site is included as **Appendix C** to this document.

- 2.2.4 University buildings and their associated safety precautions were designed with an adult population in mind. Consequently these may be inadequate to protect children (for example because of their inexperience, size or inquisitiveness). It is important to remember that a greater duty of care is owed to children than to adults and, where appropriate, risk assessments must include the hazards faced particularly by children.

- 2.3 University members are reminded that it is a criminal offence for an adult to engage in sexual activity with a person under the age of 18 where the adult is in a position of trust in a relation to the under 18 year old (Sections 3 and 4 of the Sexual Offences (Amendment) Act 2000).
- 2.4 University members should take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:
- (i) Always working in an open environment with children where they can be seen by others
  - (ii) Avoiding unnecessary physical contact with children unless to prevent danger to the child or others
  - (iii) First aid treatment should be carried out with more than one adult present unless any delay could prove life-threatening
  - (iv) Avoiding unaccompanied time with a child, including journeys.
  - (v) Avoid making suggestive remarks or being inappropriately familiar with children
  - (vi) Avoid allowing children to socialise with them and/ or visit them outside the workplace

Further information on safe working with children can be found in '**Acting on Concerns: Safeguarding guidance for NUA and NUA Students' Union staff**' which forms Appendix A of this document.

- 2.5 In appropriate cases and in accordance with the law, the University reserves the right to report to the appropriate authorities concerns it has that a University member or former University member ought to be included in any list of people who should be restricted from working with children.
- 2.6 All University members must be alert to the possibility that the children they are working with may have been, or may be, at risk of being abused. All complaints or allegations of such abuse must be taken seriously and dealt with in accordance with the procedure set out in '**Acting on Concerns: Safeguarding guidance for NUA and NUA Students' Union staff**' which forms Appendix A of this document.

## **2.7 Students aged under 18**

- 2.7.1 Child protection arrangements apply to all students under the age of 18 at enrolment, even if the period until the 18<sup>th</sup> birthday is quite short.
- 2.7.2 The University will provide enhanced welfare arrangements and accommodation procedures for student minors, and specific admission procedures will be observed. These are outlined at **Appendix B** of this document. However, Norwich University of the Arts is an adult environment and students are expected to behave like adults and to assume an adult level of responsibility. Students are expected to have the necessary skills to study and live independently with people from a variety of backgrounds. It is necessary for all students to adapt to academic life and to living away from home and looking after themselves.

### **3. SAFEGUARDING VULNERABLE ADULTS**

#### **3.1 General principle**

3.1.1 There is no legislation or guidance specific to higher education providers on safeguarding vulnerable adults, but the University recognises its responsibility to protect the health and safety of all of its members, and in particular its duty to provide fair access and equality of opportunity to all groups, including those individuals who are vulnerable adults, in vulnerable circumstances, or who are at risk of becoming vulnerable.

3.1.2 Any person may become vulnerable during the course of their study. The University recognises that people in some groups may be more at risk than others. Students with

- specific learning differences;
- mental health conditions;
- those leaving Local Authority care for the first time; and
- disabled people with impairments

are likely to be more at risk of becoming vulnerable, particularly if their situation is complicated by additional factors such as physical frailty, chronic illness, sensory impairment, behavioural problems, substance abuse problems, social or emotional problems, poverty or homelessness.

3.1.3 The University will provide a range of disclosure opportunities for students who may be vulnerable for any of the above reasons, and consequently will be in a position to provide targeted support for the above groups.

3.1.4 The University will provide relevant training and guidance to University members who are likely to come into contact with vulnerable adults, or people in vulnerable circumstances, during their work at the University.

3.1.5 University members are not expected to take decisions on adult protection interventions, but should report concerns to the University's Safeguarding Officer or her Deputy.

3.1.6 The University takes a Coordinated Support approach to share concerns and agree action within a cross-departmental forum, the Coordinated Support Group. This approach extends to students who are vulnerable adults where a need arises for coordinated inter-departmental support and confidential information-sharing.

#### **3.2 Care leavers**

3.2.1 A care leaver is defined as someone who has been in Local Authority care for at least 3 months since the age of 14, some of which must have taken place at the age of 16 or 17, and is classed as a 'home' student, and who is under the age of 25 years on the 1 August preceding enrolment on a University course.

3.2.2 The University recognises that the above legal definition may serve to exclude individuals with experience of the care system or who are estranged from their parents or have no parents, who may also be likely to fall within the definition of vulnerable adult.

### **3.3 Disabled students, including those with mental health conditions**

3.3.1 The University's Single Equality Scheme sets out the University's commitment to disabled applicants and students, and its responsibilities under the Equality Act 2010. The University has a duty to make reasonable adjustments in respect of applicants and students who appear to meet the definition of disability in the Act.

3.3.2 It is unlikely that all applicants and students who disclose a self-defined disability or health condition to the University will meet the definition of disability in the Act. It is recognised that the scope of this policy in respect of safeguarding vulnerable adults will have a broader reach than the definition of disability. For example, the definition of disability requires a condition to be long-term (likely to last at least 12 months) or lifelong. Common mental health conditions and social and emotional problems may not meet this definition, but can still give rise to vulnerability.

3.3.3 The encouragement of self-disclosure of 'disability' and health conditions in higher education works positively within the safeguarding context, as it allows the University to take proactive steps to communicate with and offer support to those who have disclosed, even if the support provided does not amount to actual adjustments.

3.3.4 The University is committed to promoting a culture of mental and emotional wellbeing amongst its students. The aim is to create an environment where all students are given the opportunity to meet their academic potential without fear of stigmatisation and/or exclusion.

3.3.5 The University will provide training for University members to:

- (i) Promote awareness of the diverse needs of students;
- (ii) Provide consistent information to staff on how to respond to students experiencing mental health difficulties;
- (iii) Clearly signpost students experiencing problems to the support that is available within the University;

3.3.6 University members are expected to:

- (i) Exercise duty of care in their dealings with students; if a person shows signs of mental health difficulty, staff should offer or seek appropriate assistance;
- (ii) Treat each student with dignity and respect;
- (iii) Recognise the boundaries of their roles knowing where, when and how to refer on;
- (iv) Keep confidentiality and exercise responsibility regarding disclosure;
- (v) Contribute towards building an inclusive community.

3.3.7 Where a University member is concerned about the well-being, safety or behaviour of a student with mental health difficulties, he/she should contact a member of Student Support to seek further advice.

3.3.8 Where a University member is concerned about the immediate health and safety of a student, that member of staff should contact the emergency services in the first instance, and report their action to the Student Support Manager.

### **3.4 Admissions**

3.4.1 The University is committed to providing fair access to all applicants and will provide applicants with information on its support services. Applicants with a disability will be offered an opportunity to discuss any support needs prior to interview.

### **3.5 Accommodation**

3.5.1 The University will ensure that Wardens and caretaking staff are given appropriate training and guidance in dealing with vulnerable adults who may reside in University accommodation, and ensure that contractors providing accommodation on behalf of the University have similar mechanisms in place.

### **3.6 Counselling**

3.6.1 The University provides a counselling service through a partner organisation. The partner organisation will be responsible for safeguarding vulnerable adults who access its service, however, the University will take all reasonable steps to satisfy itself that the partner organisation has a safeguarding policy in place to cover its regulated activity as defined by the Safeguarding Vulnerable Groups Act 2006.

### **3.7 Confidentiality**

3.7.1 The University will ensure that information about individuals remains confidential and will only be shared with those who need to know for the purposes of conducting University business.

## **4. PREVENTING RADICALISATION**

### **4.1 Legal obligations**

4.1.1 Section 26(1) of the Counter-Terrorism and Security Act 2015 confers a legal duty on the University to have due regard to the need to prevent people being drawn into terrorism.

4.1.2 The University will take steps to ensure that its Council, Senior Management Team and University members are aware of their obligations under the Act, through regular briefings, training and the issue of guidance materials as required.

4.1.3 The University will participate in and where possible initiate appropriate partnership working to assist a coordinated local approach to meeting the duty, as well as ensuring a coordinated and consultative approach within the University with student stakeholders.



4.1.4 The University will report on the steps it has taken to meet its legal obligations in this area, in the manner prescribed by Government.

## **4.2 Risk assessment and Action Plan**

4.2.1 The University shall undertake a risk assessment and draw up a related action plan to indicate how and where students might be drawn into terrorism and the mitigating action the University shall take to reduce any such risk.

4.2.2 The risk assessment and action plan shall have due regard to the University's policy and arrangements for managing external speakers and external events held on University premises; the University's IT arrangements and the role of the Students' Union and its societies.

## **4.3 Identifying students at risk of extremist ideas, radicalisation and being drawn into terrorism**

4.3.1 Appendix A to this document, '**Acting on Concerns: Safeguarding guidance for NUA and NUA Students' Union staff**', provides staff with guidance on potential indicators of radicalisation. These will be reinforced through staff training as appropriate. It is noted that these indicators can point to other difficulties such as mental health issues and relating to normal phases of late adolescence/ early adulthood. The difficulty in identifying radicalised students is therefore acknowledged, but will be mitigated as far as possible through a proportionate programme of training and awareness-raising.

## **4.4 Chaplaincy and Pastoral Care**

4.4.1 The University has a volunteer Chaplain who can provide multi-faith counsel if required. The University does not have prayer and faith facilities on campus, but students are able to book a room for use as a prayer room if required.

4.4.2 Adjustments to University timetables to enable students to observe their religious faith may also be made by the Course Leader in discussion with the Dean of Faculty.

4.4.3 The University benefits from a Coordinated Support approach in which concerns are shared and action is agreed within a cross-departmental forum. The University's student-facing staff, including Academic staff and the Student Support team, can provide pastoral care and support both to students who make an active approach to staff, and to students about whom there are concerns and who are sought out proactively by staff.

## **5. Related University policies**

Health, Safety and Environment Policy  
Single Equality Scheme  
Equality and Diversity Policy Statement  
Freedom of Speech Code of Practice  
Information Security Policy  
Data Protection Policy

## **Appendices**

- A. Acting on Concerns: Safeguarding guidance for NUA and NUA Students' Union staff
- B. Procedures when working with students who are under 18
- C. Application to bring an under-18 visitor on site  
([https://net.nua.ac.uk/wiki/student\\_resources:academic\\_registry:useful\\_information:bringing\\_visitors\\_onto\\_site:under\\_18](https://net.nua.ac.uk/wiki/student_resources:academic_registry:useful_information:bringing_visitors_onto_site:under_18))
- D. Blank Safeguarding Concern form

## **Appendix A: Acting on Concerns: guidance for NUA and NUA Students' Union staff**

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### **Introduction**

This guide has been produced to accompany NUA's Child Protection and Adult Safeguarding Policy, and will provide advice to help you respond, refer and/or report appropriately and effectively, both within and outside the University.

NUA has a Student Support team. The things they can do to support both you as a member of staff, and your students, are covered throughout this guidance and summarised on pages 8-9.

Part One of this guide will help you identify and respond to the following circumstances:

- Students who are distressed or disturbed
- Students who may present a risk to themselves or others
- Students who may be vulnerable to exploitation
- Students who tell you about the alleged abuse of a vulnerable adult

Part Two of this guide will help you safeguard any children you may come into contact with during the course of your work, including NUA students who begin their studies when aged under 18. It will also help you respond to students who report concerns about the alleged abuse of a child. More general guidance on the practicalities of working with NUA students under the age of 18 is provided in Appendix B to the Child Protection and Adult Safeguarding Policy).

## **Part One: Students and other adults**

### **Identifying concerns**

The majority of NUA students are aged between 18 and 22. At this age they may be dealing with multiple significant life changes and challenges including the development of their adult identity, a first experience of communal living, geographical and emotional independence from parents or guardians, and the challenge of studying at higher education level.

#### Mental health problems

It is not uncommon at some point during their University experience for students to develop common mental health problems such as anxiety, depression, panic, a feeling of being overwhelmed or a reduced ability to cope with stress. One in four of us will develop such a common mental health problem during our adult lives.

Some students come to University with diagnoses of more significant and enduring mental health conditions, or develop such a condition while at University.

#### Disabilities and learning differences

Other students may have a physical health condition or disability, or a specific learning difference such as dyslexia.

#### Risk of exploitation, radicalism or being drawn into terrorism

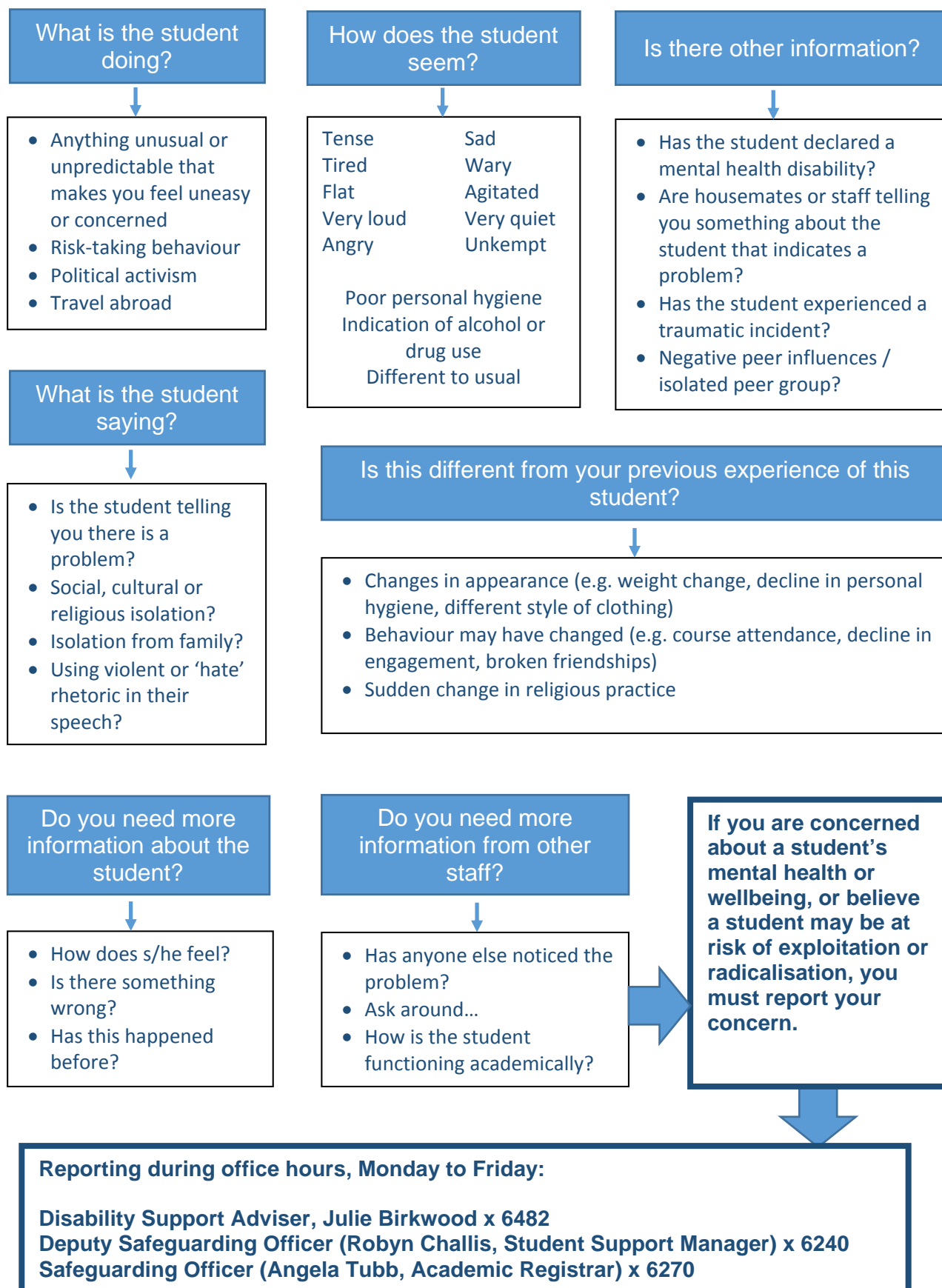
The above factors when taken singly or in combination can cause a student to be vulnerable to harm or exploitation. This can be in the form of financial or emotional exploitation for example, or in the form of radicalisation for political or religious ends.

#### Signs to look for

A student who is distressed, disturbed or being exploited may show no outward signs of this. Equally, it is widely acknowledged that normal teenage behaviour can look and sound very similar to signs of mental distress or exploitation.

It will therefore not always be possible for us to know when a student is distressed, disturbed or being exploited. But in many cases signs do exist, which are outlined below.

# Recognising when a student may be in difficulty



**You may be confronted with a situation where you observe a number of signs that concern you, as per the guidance above. Now you will need to determine the urgency of the situation.**

### **Is the situation urgent?**

**The situation is NOT urgent if there is no immediate risk to the student or others, although the student may be:**

- **Depressed, anxious, generally stressed**
- **Having problems with relationships**
- **Tearful**
- **Homesick, lonely and isolated**
- **Suffering from low self-esteem**
- **Bereaved**
- **Having unexplained study problems**

**It IS urgent if:**

**You believe that there may be a risk of suicide, severe self-harm or harm to other students or staff. You are concerned for one or more of the following reasons - the student:**

- **May be at risk of severe self-harm, including behaviour that could cause damage to self or others**
- **Has completely stopped functioning and you are concerned about their mental state**
- **Is extremely abusive, violent, or threatening violence to people or property**
- **May be a risk to others, e.g. by driving while drunk or under the influence of drugs**
- **Has told you about another adult or child who is at immediate risk**

What you should do if the situation is **URGENT**:

**In all urgent situations:**

- Prioritise your own safety and that of others at the scene
- Try to stay calm
- Engage with the person if possible but put safety first
- Consider calling Emergency Services on 999
- Contact Estates for extra support if required

After the incident:

- Log the incident with your line manager
- Debrief by talking the situation through with your line manager, Student Support or the Norwich Centre Counselling Service by making an appointment

First response: who to contact if the situation is **URGENT**:

**The Emergency Services (999).** If you mention a risk of violence, the police may attend as well as the ambulance service. Remember to dial an initial 9 to get an outside line if calling from a University phone.

**The Estates team,** who can call the Emergency Services for you if required, and can provide you with back-up. They can open building doors to allow access to the Emergency Services. During office hours (9-5) – x 6262. During extended opening hours call the Out of Hours Manager on 07948 425950.

**A First Aider - dial '0'** for Francis House Reception during opening hours (8.30am – 5.30pm). During extended campus opening hours call the Out of Hours Manager on 07948 425950.

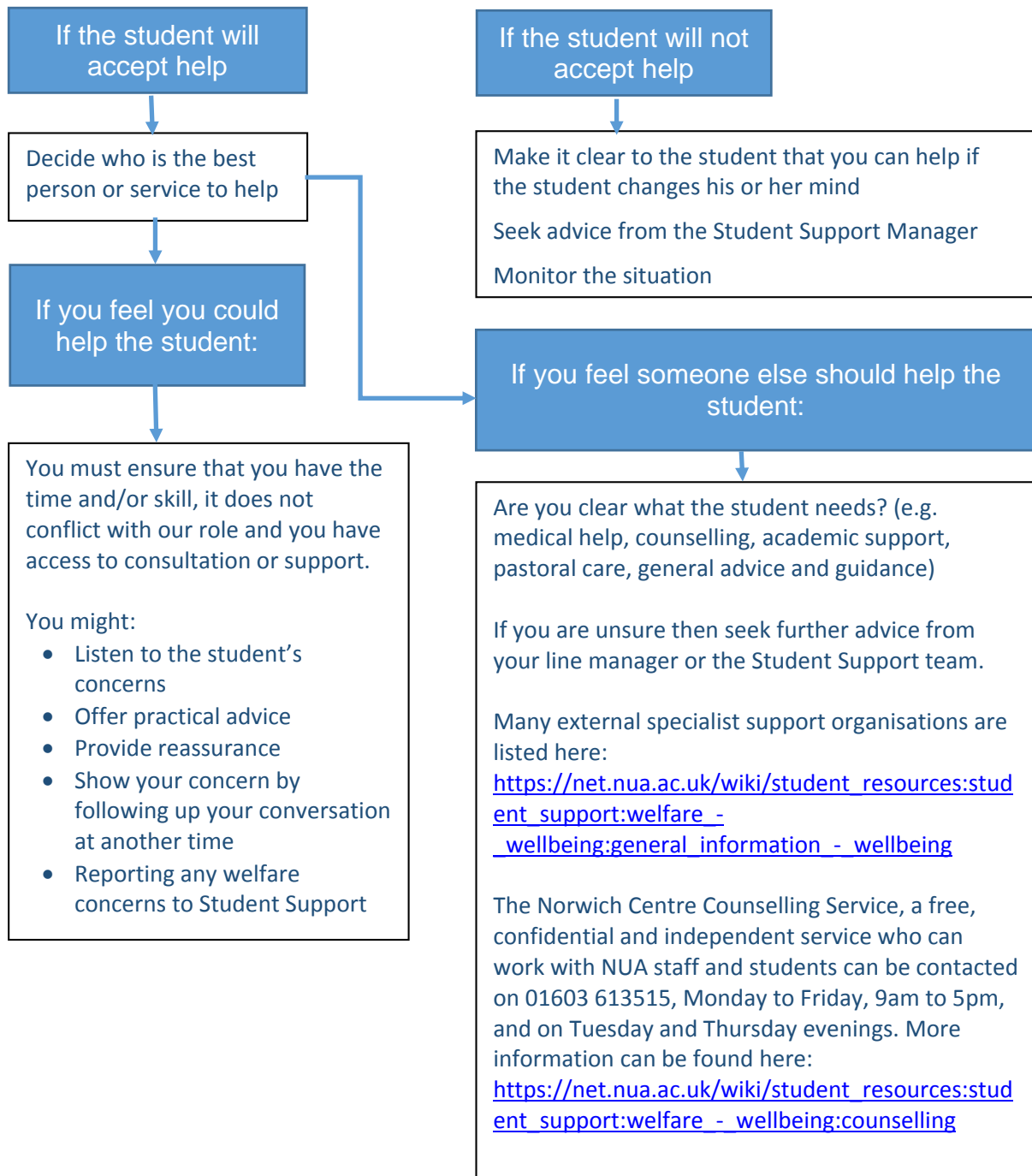
**The student's next of kin,** if they want you to. If the student refuses, only a Senior Manager can override this. Speak to your line manager or the Out of Hours Manager on 07948 425950 who will notify the Senior Management Team Duty Manager if needed.

## Questions you might be asked when calling an ambulance

<b>Where are you?</b>	
<b>What is the phone number you are calling from?</b>	
<b>Exactly what has happened?</b>	
then...	
<b>What is the age, gender and medical history of the patient?</b>	Print out the student's details from e:vision if possible.
<b>Is the person awake or conscious and breathing?</b>	
<b>Is there any serious bleeding or chest pain?</b>	
<b>What is the injury and how did it happen?</b>	
and to assist the paramedics when they arrive...	
<b>Ensure they will be able to access your building – ask someone to wait by external doors</b>	
<b>If you can, write down the patient's GP details and any medication they are taking</b>	NUA doesn't collect students' GP details so ask the student, if you can.
<b>If you can, inform paramedics of any allergies the patient has</b>	Ask Student Support and Course Enquiries to check their files for information.
<b>You may want to phone the patient's GP to ask them to provide further information to the Emergency Services.</b>	During extended campus opening hours, ask the Out of Hours Manager to check the shared drive 'General/Out of Hours' which may hold consent forms or support plans containing helpful details.



## What you should do if the situation is **NOT** urgent:



### **In ALL situations**

**You may wish to debrief by talking the situation through with your line manager or a member of the Student Support team.**

## **Responding to students with concerns about other adults**

A student may confide their own concerns about a third party, who could be a relative, neighbour, housemate or friend. We recommend you signpost the student to Student Support who will be able to discuss the situation and advise accordingly, bearing in mind the relevant safeguarding legislation and protocols.

If Student Support is closed, apply the 'urgency' test. If no-one is at immediate risk of harm, this can wait until the next working day. If you don't feel the issue should wait, you should encourage the student to call the police on either 101 (non-emergency) or 999 (emergency).

## **The role of Student Support and Safeguarding staff at NUA**

This brief guide outlines the ways Student Support can work with you and your students. The Student Support team's normal working hours are Monday to Friday, 8.45am – 5pm. The team is based in Francis House – Reception can put you through to an available team member or take a brief message.

### **How Student Support can work with staff**

- Talk through welfare concerns about students
- Receive reports from staff of concerns about health/ wellbeing/ safety/ risk of exploitation and radicalisation
- Complex case management – liaison between students, internal NUA departments and external agencies such as the police, health services and legal services
- Support vulnerable students to establish relationships with their course staff, and support course staff to engage with students
- Provide staff training, e.g. Disability Awareness training
- Provide information, advice and guidance in the following areas:
  - Dyslexia and other specific learning differences
  - Disability and Disabled Students' Allowance
  - Accommodation
  - Finance and funding
  - Wellbeing/ welfare

### **How Student Support works with students**

- Work with both current students and applicants, and happy to involve parents with the student's consent
- Ensure students receive a holistic service
- Provide specialist information, advice, guidance and/or tuition in the following areas:
  - Dyslexia and other specific learning differences
  - Managing a disability while at University
  - Accommodation
  - Finance, funding and money management
  - Oversee specialist support for students in receipt of Disabled Students' Allowance
  - Wellbeing/ welfare, including:

- Offering support and guidance for students who are finding leaving home challenging
- Liaising with academic colleagues to support students with any wellbeing issues
- Providing general information, advice and guidance on wellbeing issues such as mental health, disability, alcohol, drugs, relationships, bereavement, healthy eating etc.
- Helping to set up self-help strategies
- Advising and referring students to appropriate community services and agencies.
- Advising students who are worried about a friend, classmate or housemate
- Signpost, where necessary, to relevant internal NUA departments / external agencies
- Broker packages of support for disabled students and line manage support staff
- Manage inappropriate student behaviour in line with the University Disciplinary Procedure (applicable to behaviour in residences only – Course Leaders do this in relation to inappropriate behaviour on the course)
- Provide training to students, including PALs

### **How Student Support works at University level**

- Make safeguarding and child protection referrals to the relevant statutory bodies
- Make referrals to the relevant bodies regarding students who may have been radicalised
- Manage information and advice in the event of a health epidemic or student death
- Contribute to NUA decisions on individual students' fitness to study
- Contribute to NUA working groups including Coordinated Support Group, Disability Support Group
- Support the work of Progress Review Boards
- Contribute to Open Days and other recruitment activity through information stands, presentations etc

## Part Two: Children and child protection issues

You may be presented with a situation involving **children**. This could be in the context of

- NUA students who are aged under 18
- child visitors to the University
- a reported situation involving children external to the University, for example a student sharing a concern about a child.

More general guidance on the practicalities of working with NUA students under the age of 18 is provided in Appendix B to the Child Protection and Adult Safeguarding Policy.

### Safe working with children

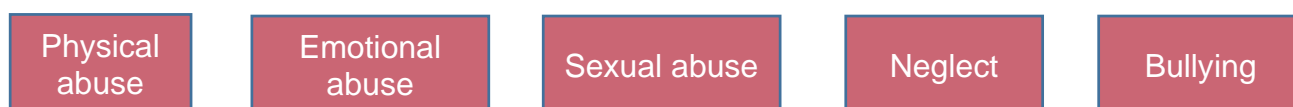
This detailed guidance is essential reading if you will be working with a child:

<http://www.childrenengland.org.uk/upload/Guidance%20.pdf>

### What is child abuse?

In order to fulfil your child protection responsibilities it is helpful to understand the five different types of child abuse and the way they can manifest themselves.

The five types of child abuse are:



### Definitions and signs of child abuse

This NSPCC factsheet covers each of the five types of child abuse and signs to be aware of.

<http://www.ncl.ac.uk/studentambassadors/assets/documents/NSPCCDefinitionsandsignsofchildabuse.pdf>

### Responding to a suspicion or allegation of child abuse

If a University member has a suspicion that a child is being abused he/she should seek the advice and assistance of the Safeguarding Officer, her Deputy, or a Senior Manager.

If a University member receives a disclosure from a child with an allegation that that child or another child is being abused, has been abused, or is at risk of abuse he/she should:

- i. Listen carefully and stay calm.
- ii. Ensure that he/she does not interview the child. If necessary, he/she may seek to clarify, using open ended questions and without putting words into the child's mouth, in order to be sure that they understand what the child is telling them.
- iii. Reassure the child that by telling him/her they have done the right thing.
- iv. Inform the child that he/she must pass the information on, but only to those that need to know about it.
- v. Inform the child to whom he/she will report the matter.
- vi. Make a detailed note of the date, time, place, what the child said and the questions asked of the child.

## **Reporting concerns**

University members should not investigate concerns themselves, but should ensure that they report any concerns or allegations/reports of abuse to the Safeguarding Officer or her Deputy.

On receipt of a report of a suspicion/allegation of child abuse by a University member, the Safeguarding Officer will make a referral to the Norfolk Multi-Agency Safeguarding Hub and/or the police where there is a significant risk of harm to a child.

University members should not make referrals to the Norfolk Multi-Agency Safeguarding Hub (MASH) or the police without consultation with the Safeguarding Officer or her Deputy, except in urgent circumstances. If the situation is urgent you can contact the MASH on **0344 800 8020**. If you consider the incident to be an emergency, call **999**.

## **Record Keeping**

When a University member or the Safeguarding Officer is made aware of a suspicion of abuse, appropriate records must be made.

Report of a Safeguarding Concern forms are available from the Safeguarding Officer.

University members should ensure that all written records are factual and report what has been heard or witnessed. Each record must include the date, time and place that the allegation was made, or behaviour witnessed.

University members must pass the report to the Safeguarding Officer and should destroy electronic copies immediately. Photocopies of completed reports should not be made or kept.

The Safeguarding Officer will make every effort to report the outcome to the University member reporting the concern, in so far as it is possible to do so. This report may be limited to confirmation that the concern has been passed on to the relevant authority.

## **Appendix B: Procedures when working with students who are under 18**

### **Admissions**

The University is committed to Equality and Diversity and does not discriminate on any grounds, including age.

If an offer is made to a student under the age of 18, the University will send information explaining the measures that are in place to safeguard student minors.

The parents or guardians will have the opportunity to give their consent for the student minor to take part in any activities that any student would normally undertake, with the exception of those against the law. If, having considered the documentation, they do not wish the student minor to participate, it might be appropriate to amend the offer for a deferred place.

The University provides the same level of safeguarding for all student minors regardless of country of origin.

It would be expected that the parents or guardians of overseas applicants under the age of 18 would nominate a UK guardian wherever possible.

The issue of inappropriate material being available to a student minor through the course programme (eg. Cert 18 games) or within the University Library will be discussed as part of the admissions procedure. The use of life models is acceptable in a specialist arts environment but parents and guardians must be made aware of possible contact with student minors.

### **Enrolment**

Student minors will be enrolled in the same way as all students, but it is important for the consent form to be signed by both student minors and parents or guardians, giving consent for information to be shared with appropriate areas within the University before enrolment takes place.

Any student minor enrolling onto a course at the University will be fully informed by letter of the enhanced arrangements in place, who to contact if there are any concerns regarding any aspects of their safety and wellbeing, and who is authorised to take any action that is deemed necessary.

### **Course area**

A personal tutor assigned to the student minor will have an appropriate timetable for meetings with the student on a regular basis until they reach 18 years of age. The personal tutor will make the University aware of any concerns they may have regarding the student minor's behaviour or welfare.

Consent forms signed by parents or guardians will be required before any student minor can take part in any planned University activity off campus.

The University will ensure risk assessments are conducted on a regular basis to cover the University premises, accommodation and any sites 'off-campus' (e.g. work placements, field

trips). Risk assessments will also cover situations where staff might be working in isolation such as caretaking staff in both academic and University accommodation buildings.

For student minors taking part in activities away from the University premises, as agreed with their parents/guardians, the staff organiser must make the group leaders and/or trip organisers aware of any under 18s in the group and take appropriate child protection measures.

All student minors will be allocated a student PAL Mentor (Peer Assisted Learning Mentor) as well as a personal tutor.

There is a co-ordinated advice and guidance service within the University and all students are encouraged to share their concerns and any problems with staff in the course areas, Students' Union or in Student Support.

### **NUA Accommodation**

Student minors requiring accommodation will be placed, if eligible, in a single sex corridor at Beechcroft (not Harvard Court or All Saints Green).

Student wardens will be notified that there are student minors on the premises and they will endeavour to be extra vigilant. They are not there to supervise the daily movements of the students and cannot be held responsible for their actions. Student wardens are responsible for making sure that staff in Student Support are aware of any areas of concern or if the student minors do not adhere to any of the University Policies and the Student Regulations and Procedures.

Parents should recognise that residential accommodation offered by the University is generally intended for the use of adults and that, save in exceptional circumstances (e.g. relating to health issues or disability), special arrangements cannot be made.

Staff from Student Support will discuss with student minors and their parents or guardians any questions or concerns they may have. The nature of support could include regular meetings with the University Accommodation Officer about any issues that have arisen in the accommodation until the student reaches their 18th birthday.

### **Financial guarantors**

Parents or guardians will be required to act as guarantors for any contract or debt in connection to Norwich University of the Arts, which the student minor might incur up to their 18th birthday.

### **Students' Union**

Students who are under the age of 18 are encouraged to join University or Students' Union clubs and societies but are not able to hold office until after their 18th birthday (this is because Officers carry legal responsibilities). Their participation in certain activities may be limited.

## **Emergencies**

It is especially important that emergency contact details of any student under the age of 18 are kept up to date. This information is required prior to the student's enrolment at the University.

In the event of an emergency the University will make every effort to contact the named next of kin but in certain circumstances such as dealing with the police, or in medical emergencies (including mental health issues), the University may have to take immediate action.

The University will work with relevant external agencies where any incident of abuse is reported.



## Appendix C – Application to bring under-18 visitors onto site

Please refer to:

[https://net.nua.ac.uk/wiki/student\\_resources:academic\\_registry:useful\\_information:bringing\\_visitors\\_onto\\_site:under\\_18](https://net.nua.ac.uk/wiki/student_resources:academic_registry:useful_information:bringing_visitors_onto_site:under_18)

### BRINGING VISITORS ONTO SITE TO PARTICIPATE IN COURSE ACTIVITIES

If you are planning to bring visitors onto site to participate in a course activity, you will need to obtain permission from the University before the date of the planned activity. You will need to complete the **Request for permission to bring visitors onto University premises** form with details of your activity, and all of the non-University participants taking part. If your activities involve participants under the age of 18, you will need to complete a different form for those participants (see below).

You should submit your completed form to the Course Leader or the Student Enquiries Office **at least 2 working days** before the planned activity. Please include all of the information requested. ***Incomplete forms will be returned and will result in a delay to the relevant permission being granted.***

Please note that you will not be allowed to proceed with your planned activity if you have not obtained the relevant permission. Requests submitted less than 7 days in advance will not be accepted and you will need to reschedule your activity.

#### Participants who are under-18

If you wish to include a participant who is under the age of 18 to take part in a course activity on University premises (e.g. filming, photography or voice recording) you will need to complete a separate application form in order that the University can obtain parental consent and fulfil its obligations to safeguard children and young adults on its premises. A child is defined as a young person below the age of 18 and includes students.

For participants under the age of 16 use the '[Request for permission to bring an under-18 visitor onto University premises for participants under the age of 16](#)'.

For participants aged 16 or 17, please use the '[Request for permission to bring an under-18 visitor onto University premises for participants aged 16 or 17](#)'.

*Note: if you have a mixture of participants aged under 16, and 16 or 17, please use the form for participants under the age of 16 and include details of all under-18 year olds on this form.*

You should submit your completed form to the Course Leader or the Student Enquiries Office **at least 7 working days** before the planned activity. Please include all of the information requested. ***Incomplete forms will be returned and will result in a delay to the relevant permission being granted.***

#### Safeguarding under 18s

It is important that you understand your obligations if you are involving a person who is under-18 in your activity. Care must be taken over the physical and emotional welfare and the dignity of people who are under-18 and who take part, or who are otherwise involved in, films, recordings, photographs or other performances, whether or not on University premises. If you are organising an activity involving under-18 participants you must ensure that you adhere to the following guidelines:

- Under-18 participants should be treated with respect at all times, and should not be discriminated against on the basis of race, gender, religion or belief, sexual orientation, gender identity, economic status or ability.

- Children under the age of 16 should be accompanied by a parent or legal guardian, or other appropriate adult (e.g. school teacher) at all times.
- Under-18 participants should not be allowed to leave the location of the activity unaccompanied.
- No participant should be subjected to unnecessary distress or anxiety by their involvement in the planned activity.
- No participant should be put at unnecessary risk of danger.
- Under-18 participants should not be subjected to swearing or inappropriate language, or be allowed to smoke, drink alcohol or take part in any other activity restricted to over-18 year olds.
- All those involved in the activity should avoid making unnecessary physical contact with, or engaging in conversation or behaviour that may be misinterpreted as flirtatious or suggestive by, an under-18 participant.
- Participants, regardless of their age, must not be allowed to take part in any criminal activity.

### **Under 16 performance/entertainment licence**

Where participation of a child under the compulsory school age involves taking part in a performance, it may be necessary to obtain a performance licence from the child's Local Authority, in addition to obtaining permission from the University. Performance includes film, audio-recording for films/animations or broadcasts and photography. Individuals are considered to be of compulsory school age until the last Friday in June in the school year in which they reach 16 (under current legislation).

#### **A child may perform without a licence for up to four days if:**

- the child is not getting paid;
- no absence from school is required;
- the child has not performed in the previous six months

If you are paying the child as a performer or a model you will need to apply for a licence regardless of the duration of the planned activity. This also applies if your activity will involve the child taking any time off school.

If you need to apply for a licence, applications should be submitted to the relevant Local Authority at least 21 days before the performance takes place to guarantee that the licence will be granted in time for the planned activity. The licensing authority is normally the Local Authority where the child lives. If a child attends boarding school, the Local Authority is where the school is located. Forms and guidance should be obtained from the relevant Local Authority.

### **Protection of Children Act 1978**

It is a criminal offence to take, distribute, or show an indecent photograph or image of an under 18. This provision includes filming for television, and filming or photography intended for submission for assessment and/or for the final degree show. This includes involvement of a person under 18 in a photograph or film image that is itself indecent, even if the under-18's role in it is not central. The legislation is contained within the Protection of Children Act 1978 (PCA) (section 1). For purposes of the act, a child is defined as any person under the age of 18. The Criminal Justice Act 1988 (CJA) (section 160(1)) has broadened the scope of this legislation and makes it an offence to possess any indecent photograph etc. whether or not there is an intention to distribute.

## **Data Protection**

The Data Protection Act 1998 (DPA) gives individuals rights of control over the collection and use of their personal data and applies to children as well as adults. Personal data can include photographs or images of identifiable individuals where they are the focus of the photograph and are capable of being identified. Incidental inclusion of an image, for example a street scene, is unlikely to fall within the scope of the DPA provisions. It is important that where a photograph or film is made that the individual's informed consent is obtained in order to ensure that the participant's rights under the DPA and their right to privacy are not contravened. Informed consent means that the participant(s) must be made aware of the full details of the activity that they will be taking part in, and what the photograph/images will be used for. When taking images of a child, the consent of one or both of the parents or legal guardians must also be obtained.

## **Copyright**

Please note that this process does not replace the need for you to obtain the relevant professional permissions, waivers or release forms. You will need to ensure that you agree in advance who owns the copyright to the final film/photograph/voice-recording, and that all participants fully understand their rights with respect to the finished product. If you require information about copyright, please contact your Course Leader.

## **Further information and references**

[JISC: Legal Aspects of the Use of Child Images in OERs](#)

[BBC Editorial Guidelines: Working with Children and Young People](#)

[Channel 4 Guidelines: Working and Filming with Under 18s](#)

[The Children \(Performances\) Regulations 1968](#)

[Norfolk County Council Guidance on Children in Entertainment/Entertainment Licences](#)

## **Appendix D: External Referrals**

External referrals will be normally be made by the Safeguarding Officer, or Deputy Safeguarding Officer.

### **Norfolk Multit-Agency Safeguarding Hub (MASH)**

The MASH acts as a first point of contact, receiving new safeguarding concerns or enquiries relating to:

- Child abuse
- Adult abuse
- Domestic abuse
- Child Sexual Exploitation
- Missing person coordination
- Honour-based Abuse and Female Genital Mutilation Investigations

MASH is a partnership between:

- Norfolk County Council Children's and Adult Care Services;
- Police
- Leeway and Orwell, Independent Domestic Violence Advisory Services (IDVA)
- Magdalene Group, ROSE Project (CSE and Young Runaways)
- Children Health Services
- Probation Service

### **Child Protection and Adult Safeguarding enquiries**

Email: [mash@norfolk.gcsx.gov.uk](mailto:mash@norfolk.gcsx.gov.uk)

Hotline number: **0344 800 8020**

### **Adult/Child Safeguarding Referrals**

Online reporting tool (Adult): <https://www.norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm/report-a-concern>

Child Safeguarding Referral (including Local Authority Designated Officer (LADO) referrals): <http://www.norfolkscb.org/people-working-with-children/nscb-forms/>

### **Prevent/Channel enquiries:**

Email: [MASHsupervisors@norfolk.pnn.police.uk](mailto:MASHsupervisors@norfolk.pnn.police.uk)

Tel: **01603 276151**