

UNIVERSITY OF BOLTON SAFEGUARDING POLICY AND PROCEDURES: CHILDREN AND ADULTS AT RISK (PREVIOUSLY VULNERABLE ADULTS)

SAFEGUARDING

1 Introduction

- 1.1 The University of Bolton (**University**) Board of Governors has formal responsibility for the safeguarding of children and adults at risk (previously vulnerable adults) and for ensuring that this policy complies with the University's legal obligations, and that all those under the University's control comply with it. The Board of Governors have appointed a member to the role of Nominated Safeguarding Lead who, together with the Registrar (Designated Executive Safeguarding Lead) and Assistant Vice-Chancellor ((Transformation) Deputy Designated Executive Safeguarding Lead)), will act on their behalf to ensure that all members, students and employees of the University comply with the requirements of this policy.

2 Safeguarding and protecting people

- 2.1 Safeguarding is the protection of people from harm. It includes the protection of children and adults at risk of harm and the prevention of those who are deemed unsuitable to work with them from doing so.
- 2.2 The University will take reasonable steps to ensure that its students and others who come into contact with the University, including children and adults at risk, do not, as a result, come to harm or are exposed to abuse and will be alert to and act upon situations where they may be caused harm.
- 2.3 The University acknowledges that it has statutory duties relating to the safeguarding of children and adults at risk, namely:
- 2.3.1 In respect of children (including everyone under the age of 18):
- (i) protecting children from maltreatment;
 - (ii) preventing impairment of children's health or development;
 - (iii) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - (iv) taking action to enable all children to have the best outcomes.
- 2.3.2 In respect of adults at risk:
- (i) protecting their right to live in safety and free from abuse and neglect, where as a result of their care and support needs they are unable to do so themselves.

2.4 The University has a zero-tolerance approach to any forms of potentially harmful behaviour.

3 Purpose of this Policy

3.1 The purpose of this Policy is to aid the University in fulfilling its statutory duties and minimise the risk of harm to children and adults at risk. This Policy forms part of the University's approach to safeguarding and protecting people and should be read in conjunction with the policy and procedures listed at 17.

3.2 The University will ensure that there are appropriate safeguarding policies, procedures and measures in place that are fit for purpose and reviewed annually. Furthermore, where the University's staff, students or visitors have concerns about the welfare of children or adults at risk, the University will ensure that they know what to do about those concerns and are quick to respond to such concerns.

3.3 This Policy has been approved by the Governing Body and is applicable to all members of staff and students as well as visitors to the University (where appropriate). The policy is available on both the student and staff webpages of the University Website.

3.4 All incidents of alleged misconduct concerning safeguarding will be taken seriously by the University and may lead to disciplinary action against those involved.

3.5 Whilst the University is primarily a Higher Education Institution and as such staff are not routinely directly involved with children (i.e. those under the age of eighteen), there are a number of situations when University Staff and Students have direct contact with children, these may include:

- Teaching enrolled students who are under 18
- Acting as a personal tutor to students under 18
- Providing support services to applicants and students under 18, including counselling, disability and student finance advice
- Running summer schools at the University or off campus
- Providing work experience for children under 18
- Running open days
- Undertaking outreach work in schools or colleges
- Guest lecturing on a regular basis in the University Technical College (UTC), schools or colleges
- Interviewing applicants

- Undertaking research involving children
 - Observing trainee teachers who are teaching children under 18 or student nurses who are providing care to under 18s
 - Voluntary work with children under 18
 - Placements undertaken with children under 18
 - It should also be noted that some members of the University of Bolton community will be parents and through engagement with these staff or students concerns may arise regarding their children or other family members.
- 3.6 Where, as part of their studies, a student is required to engage in a placement outside of the University, they shall use the safeguarding arrangements applicable at that provider. The University will ensure as part of its assessment of placement providers that such a policy is in place.
- 3.7 Apprenticeships: Employers offering apprenticeships to University students will be made aware of who the relevant Designated Safeguarding Champion is within the Apprenticeship Hub at the University in the event that Employers need to share any concerns about a child or adult at risk being at risk of harm. The University will work with Employers accepting University students as apprentices in relation to training and to ensure appropriate safeguarding measures are in place.

4 Relevant Legislation

- 4.1 The legislation relevant to this Policy includes the Children Acts (1989 and 2004) and related guidance. This includes the DfE statutory guidance 'Keeping Children Safe in Education', September (2019); the DfE revised Statutory Framework for Early Years Foundation Stage (2017) and Working Together to Safeguard Children (2018), The Care Act (2014) and the Safeguarding Vulnerable Groups Act (2006) (SVGA 2006) and Prevent Duty under the Counter-Terrorism and Security Act 2015.

5 Definitions

- 5.1 There are various definitions used in this Policy as follows:
- 5.2 "Abuse" - definitions of the four categories of abuse can be found in Appendix 2.
- 5.3 "Child" or "children" includes all those who are under the age of 18 years.
- 5.4 "Regulated activity relating to adults at risk/vulnerable adults" is defined in the SVGA 2006 and includes (this is not an exhaustive list): the provision of health care treatment in any setting by a health care professional, or by a person acting under the direction or supervision of a health care professional, the provision of certain types of personal care to a person who needs it because of age, illness or disability, the provision of prescribed social work by a social worker to clients or

potential clients' the provision of assistance, in relation to general household matters, to a person who requires it because of age, illness or disability, transportation provided because of a person's age, illness or disability.

5.5 "regulated activity relating to children" is defined in the SVGA 2006 and includes (this is not an exhaustive list):

5.5.1 specified unsupervised activities relating to children (e.g. teaching, training, instruction, care or supervision) which are carried out on a frequent (as a general rule at least once a week), or intensive (more than three days in any 30 day period) basis, or overnight (between 2am and 6am where the activity gives the person the opportunity to have face-to-face contact with children);or

5.5.2 certain work in a specified place which provides the opportunity for frequent contact with children (e.g. a school).

5.6 "Adult at risk" (previously "Vulnerable adult") - means a person aged 18 or over whose ability to protect himself or herself from violence, abuse or neglect is significantly impaired through physical or mental disability or illness, through old age or otherwise and to whom a "regulated activity relating to vulnerable adults" is provided.

5.7 The Care Act 2014 informs us that safeguarding duties apply to an adult who is over 18 years of age, who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

5.8 "University Member" is used to describe anyone at the University who is engaged in working with children or vulnerable adults on the University's behalf, whether as an employee, volunteer, apprentice or student.

6 Positions of Responsibility

6.1 The University has appointed a Designated Executive Safeguarding Lead who is the Registrar & Clerk to the Governors and is also the Executive PREVENT Lead and manager of the University Health and Safety Manager and a Deputy Designated Executive Safeguarding Lead who are responsible for:

6.1.1 acting as the main executive lead on all safeguarding matters;

6.1.2 appointing a Safeguarding Officer (SO) who will take an operational lead on safeguarding;

- 6.1.3 ensuring the Safeguarding Officer implements and promotes the policy;
 - 6.1.4 reporting to appropriate committees, Vice Chancellor and Board of Governors on Safeguarding and providing assurances on the effectiveness of safeguarding measures at the university;
 - 6.1.5 supporting operational safeguarding post holders and the wider staff on complex safeguarding matters including where appropriate seeking legal advice.
- 6.2 All the University's staff, students and visitors should know who to go to report a concern around safeguarding.
- 6.3 The University will therefore appoint a **Safeguarding Officer (SO)** who will lead on safeguarding in the University. The **SO** will be responsible for:
- 6.3.1 implementing and promoting this Policy;
 - 6.3.2 regularly reporting to the Registrar and Assistant Vice-Chancellor (Transformation) as applicable;
 - 6.3.3 on a regular basis the Safeguarding Officer will report to the Assistant Vice-Chancellor (Transformation) who is the Deputy Designated Executive Safeguarding Lead on all issues that arise in relation to this policy and will confirm to the Assistant Vice-Chancellor (Transformation) on an annual basis that the policy has had necessary revisions in accordance with changes in legislation and guidance on the safeguarding of children and adults at risk;
 - 6.3.4 acting as the main operational lead within the University for the safeguarding of children and adults at risk;
 - 6.3.5 providing University members with information, advice and guidance whilst coordinating training with Human Resources (HR) on the safeguarding of children and adults at risk;
 - 6.3.6 referring concerns that a child might be at risk of significant harm to the local children's social care services and/or the Police;
 - 6.3.7 establishing and maintaining contacts with the local children's social care services departments and Police;
 - 6.3.8 ensuring that concerns are logged and stored securely;
 - 6.3.9 maintaining confidential records of reported concerns and action taken;
and

6.3.10 making referrals to the Disclosure and Barring Service (“DBS”) where required under the SVGA 2006.

6.4 It is not the role of the Safeguarding Officer to decide whether a child/ adult at risk has been abused or not - that is the responsibility of investigative statutory agencies such as Children’s Social Work Services or the Police.

The Safeguarding Officer will appoint a **Deputy Safeguarding Officer (DSO)**, **Senior Designated Safeguarding Champions (SDSC)** and **Designated Safeguarding Champions (DSC)** to assist in discharging their responsibilities. The SO in consultation with the Academic Management will also ensure DSCs are appointed for each school and relevant professional support services including the Students’ Union.

The role of the **DSO** includes:

- deputising in the absence of the SO;
- supporting the SDSCs and DSCs;
- providing University members with information, advice and coordinating training with Human Resources (HR) on the safeguarding of children and adults at risk;
- referring concerns that a child might be at risk of significant harm to the local children’s social care services and/or the Police;
- establishing and maintaining contacts with the local children’s social care services departments and Police;
- ensuring that concerns are logged and stored securely;
- maintaining confidential records of reported concerns and action taken; and
- making referrals to the Disclosure and Barring Service (“DBS”) where required under the SVGA 2006.

The role of the **SDSCs** includes:

- acting as the first port of contact for the DSC who are making a report/referral, which includes checking on safeguarding@bolton.ac.uk on a daily basis;
- provide support to colleagues with safeguarding enquiries/concerns;
- to liaise directly with the SO and DSO in relation to incidents which may require referring externally;
- liaise with external bodies under the direction of the SO and DSO.

The role of the **Designated Safeguarding Champions (DSC)** includes:

- acting as the first port of call for all safeguarding concerns within their department;
- ensuring that University staff and students, and visitors to the University (where appropriate), are aware of the policies and procedures in place for safeguarding children and adults at risk and that these policies and procedures are followed;
- signposting support services for individuals who are named on a Safeguarding Report;
- signposting support for staff who have reported a concern.

6.5 The **Executive Director of HR** shall be the institutional point of contact for any safeguarding concerns relating to staff and with the assistance of the HR DSC will be responsible for the co-ordination of all safeguarding training and ensuring appropriate procedure is adhered to in accordance with this Policy for recruitment of University staff.

6.6 A list of key contacts, including details of the SO, the DSO, SDSCs and the DSCs, can be found at Appendix 3. The relevant contact details for each of the key contacts can be found at Appendix 8. Alternatively, a list of SDSCs and DSCs is available from the Student Centre; Life Lounge, Security or Main Reception.

7 Training

7.1 Training will be arranged by HR for the DSO, DSO, SDSCs and DSCs to ensure that they are aware of issues, policies and procedures.

7.2 The SO, DSO, SDSCs, DSCs and all members of the University's staff and students who work directly with children and/ adults at risk shall undertake training provided by HR, to ensure that:

7.2.1 they are made aware of this Policy and the procedures and protocols for promoting and safeguarding the welfare of children and adults at risk;

7.2.2 they learn how to recognise their responsibilities with regard to their own good practice and the reporting of suspected poor practice/ concerns of possible abuse.

7.2.3 they are familiar with, and should know whom to contact, to express concerns about a child's welfare or adult at risk, health and/or development; and

5.2.4 training will be delivered to all new staff and volunteers who work directly with children and/adults at risk during their induction. For existing staff training can be arranged by contacting HR.

8 Code of Behaviour and Good Practice in Relation to Safeguarding Children and Adults at Risk

- 8.1 All members of the University's staff, students and visitors (where appropriate) should treat each other in accordance with Equal Opportunities Policy and the Code of Behaviour and Good Practice at Appendix 4.

9 Reporting a concern

- 9.1 Any incidents which cause concern in respect of a child or adult at risk are required to be reported immediately to your relevant Designated Safeguarding Champion (DSC), your champion will complete the Reporting a Concern Form at Appendix 5 and will inform the Senior Designated Safeguarding Champions (SDSCs) in Student Services. Examples of incidents that you may want to include are at Appendix 6. The Senior Designated Safeguarding Champions will share any concern direct with the SO or DSO.

- 9.2 If a concern is reported to you, there is guidance about handling allegations at Appendix 7. You should then complete the form at Appendix 5.

- 9.3 The process of raising and reporting a safeguarding concern is diagrammatically represented in Appendix 1.

- 9.4 The reporting of a safeguarding concern may require the implementation of other procedures and or policies including but not limited to the Staff and or Student Non Academic Conduct and Disciplinary Policy and Procedure or Fitness to Practice Policy and Procedure.

- 9.5 The Safeguarding Officer or Deputy Safeguarding Officer and/or Assistant Vice-Chancellor (Transformation) or in their absence the Executive Director of HR will report concerns raised/share data with any relevant external organisation. In the absence of the staff above or under the instruction and direction of the staff above Senior Designated Safeguarding Champions can share information with external organisations.

9.6 Additional reporting

- 9.6.1 In addition to the reporting requirements explained above, the University will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to the following:

9.6.2 Health and Safety Executive

- (i) The University is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the University's Health and Safety Policy for further details about this.

9.6.3 Disclosure and Barring Service (DBS)

- (i) A referral to the DBS will be made promptly if the relevant criteria are met.

9.6.4 Insurers

- (i) The University will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (ii) Care should be taken to ensure this is done before renewal to ensure that the University complies with its duties under the Insurance Act 2015. If the University is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

9.6.5 Office for Students (OfS)

- (i) A referral to the OfS will be made if the relevant criteria are met in accordance with the Reportable Events guidance.

10 Record Keeping

- 10.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The records created in accordance with this Policy may contain personal data.
- 10.2 All personal data will be processed by the University in accordance with the requirements of data protection legislation, including the Data Protection Act 2018 and General Data Protection Regulation. The University has a number of privacy notices which explain how the University will use personal data for the benefit of students and staff. The privacy notices are published on the University's website and can be found here:

<https://www.bolton.ac.uk/about/governance/documents/#dataprotection>.

In addition, staff must ensure that they follow the University's Data Protection Policy when handling personal data created in connection with this policy.

- 10.3 All records created in accordance with this Policy are managed in accordance with the University's policies that apply to the retention and destruction of records.

11 Information sharing and multi-agency working

- 11.1 The University will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The University will always act in order to safeguard and promote the welfare of others.

- 11.2 The University understands that information sharing is essential for effective safeguarding and promoting the welfare of children, young people and adults at risk. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of the University's students, which is always the University's paramount concern. The University understands that the Data Protection Act 2018 and the General Data Protection Regulation provide a framework to ensure that personal information is shared appropriately.
- 11.3 Where allegations have been made against staff, the University will consult with the Designated Offices(s) of the Local Authority and, where appropriate, the police to agree the information that should be disclosed and to whom.
- 11.4 While the University will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

12 Recruitment

- 12.1 The University will undertake appropriate checks on all staff (including people from or working overseas) to ensure an individual's suitability for their role. In particular, consideration will be given to eligibility for the following checks and if so at what level and frequency checks should be undertaken for the role:
- 12.1.1 CVs;
 - 12.1.2 References;
 - 12.1.3 Employment history (and exploring any gaps in their employment history);
 - 12.1.4 Whether it is appropriate to ask a potential member of staff whether they have any unspent criminal convictions or to themselves obtain a basic DBS check;
 - 12.1.5 Where a role includes carrying work which would be deemed "regulated activity" if done more regularly, the University will consider whether or not it is appropriate to require a standard or enhanced disclosure from the DBS or an International Child Protection certificate before they are permitted to work on an unsupervised basis.
 - 12.1.6 Confirmation that the person can work in the UK; and
 - 12.1.7 Health checks where appropriate.
- 12.2 For positions that involve "regulated activity relating to children" or "regulated activity relating to vulnerable adults (adults at risk)", the following procedures will be completed:

- 12.2.1 All applicants will be required to complete an application and as part of this application in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and/or the Police Act 1997 (Criminal Records) Regulations 2002 will be required to disclose any convictions, cautions, reprimands or final warnings which would not be filtered. Therefore, applicants are required to disclose information in relation to any past criminal behaviour that is relevant to the position.
- 12.2.2 References will be sought from all staff applicants and from prospective students to specific programmes of study.
- 12.2.3 If the applicant or an existing University Member who has not previously been required to work with children or adults at risk in their position has no experience of working with children or adults at risk the University will agree specific training requirements with them before appointment.
- 12.2.4 The University is registered with the DBS and will ensure that any University Members who will engage in “regulated activity relating to children” or “regulated activity relating to vulnerable adults (adults at risk)” are checked for relevant criminal convictions. The University will request an Enhanced Disclosure from the DBS and, if applicable to any particular role, seek confirmation that the applicant is not named on the Children's and/or Adults' Barred List in respect of all applicants who will engage in such activity. Any such disclosures will be stored securely and confidentially and only used for the purposes of the applicant's application and otherwise in accordance with the Policy and Guidance Notes on the use of the Disclose and Barring Service (DBS) and Employment Contract, the University's Data Protection Policy and data protection legislation, including the Data Protection Act 2018 and General Data Protection Regulation.

13 Activities or events run by the University where children or adults at risk are to be present (to be read in conjunction with Outreach Events – Safeguarding Guidelines)

- 13.1 University staff or students organising activities at the University involving children and/or vulnerable adults must ensure that:
 - 13.1.1 the DSC (Events and Activities) is informed of the activity taking place well in advance and provided with details of the activity as well as details of those individuals involved in the activity;
 - 13.1.2 the individuals involved in the activity are aware of and understand the Policy and these procedures;
 - 13.1.3 private or unobserved contact with children is avoided wherever possible;
 - 13.1.4 if first aid is required, where possible, it is administered in the presence of another adult and the DSC is informed; and

- 13.1.5 parental consent is obtained for the use of any photographs, film or videos.
- 13.2 The DSC (Events and Activities) is then responsible for ensuring that those individuals assisting in the activity, be they University staff, students or volunteers are suitable to work with children or adults at risk and that they have had the necessary checks.

14 External organisations visiting the University

- 14.1 External organisations working with children or vulnerable adults and using University facilities will be required to provide a written statement stating that their staff, and/or volunteers, where appropriate have had the necessary checks and that the organisation has its own policy and procedure and nominated safeguarding officer. The written statement must identify who the organisation has nominated as a safeguarding officer.

15 Research

- 15.1 Where any research involves contact with children or adults at risk, the University Research Ethics Committee will, with guidance from the Research and Graduate School DSC, identify any specific practices to be followed in the research in the interests of safeguarding the welfare of children and/or adults at risk.

12 Prevent Duty

- 12.1 Under the Prevent duty introduced by the Counter-Terrorism and Security Act 2015, the University, as a higher education body will need to assess the risks of people being drawn into terrorism and ensure that it has plans in place for mitigating these risks.
- 12.2 The University will have due regard to the need to prevent people from being drawn into terrorism and will have regard to the Government's Prevent Duty Guidance: for England and Wales.
- 12.3 Staff who have concerns relating to students or colleagues being drawn in to terrorism should contact the relevant DSC.
- 12.4 The University Safeguarding Officer and Deputy Safeguarding Officer are members of the Bolton Prevent Steering Group.
- 12.5 The University Safeguarding Officer and Deputy Safeguarding Officer are members of the Greater Manchester Prevent University Group.

13 Channel

- 13.1 Channel forms a key part of the Prevent strategy. It is a local way of various agencies acting to identify and support individuals and support individuals to prevent them from moving into terrorism.

- 13.2 Manchester Local Authority is required by law to establish a “Channel Panel” to assess whether a particular person is at risk of being drawn into terrorism and if he/she is then supported in reducing that risk.
- 13.3 The law states that the University is a partner of the Channel Panel and that the University must, so far as is lawful and reasonably practicable, co-operate with:
- 13.3.1 The Channel Panel in the carrying out of the Panel’s functions; and
- 13.3.2 The Police who work with the Channel Panel
- 13.4 In co-operating with the Channel Panel and the Police, the University will act in accordance with its statutory and legal obligations and will not act outside of its powers.
- 13.5 In accordance with the University’s obligations under data protection legislation, including the Data Protection Act 2018 and General Data Protection Regulation, the University will share information with the Channel Panel.

14 Students’ Union

- 14.1 The University will work with its Students' Union to manage the risks relating to activity which involves Children or Adults at Risk and originates with the Students’ Union. To this extent the Students’ Union has a Senior Designated Safeguarding Champion.

15 Welfare and pastoral care/chaplaincy support

- 15.1 The welfare of the University’s staff and students is paramount. The University therefore has support services including chaplaincy and pastoral support including but not limited to Mental Health Advisors, Counsellors, CBT Therapists, Wellbeing Staff and Dignity at Study Champions (Bullying and Harassment) available for all students. Staff have access to VIVUP and the chaplaincy.

16 Working in Partnership

- 16.1 The University recognises the importance of safeguarding children and adults at risk and the need to work in partnership with external organisations in order to fulfil its responsibilities.

17 Policies and Further Information

- 17.1 This policy and procedure should be read in conjunction with:
- Disclosure and Barring Service (DBS) Policy and Procedure
 - Student Non Academic Conduct and Disciplinary Policy and Procedure
 - Staff Disciplinary Policy
 - Prevent Policy
 - Dignity at Study (Bullying and Harassment) Policy
 - Freedom of Speech and Meetings on University Premises

- Freedom of Speech and Planned, Affiliated, Funded or Branded Events taking place Off Campus
- Data Protection Policy
- Outreach Events – Safeguarding Guidelines
- Procedure for the support of Under 18s

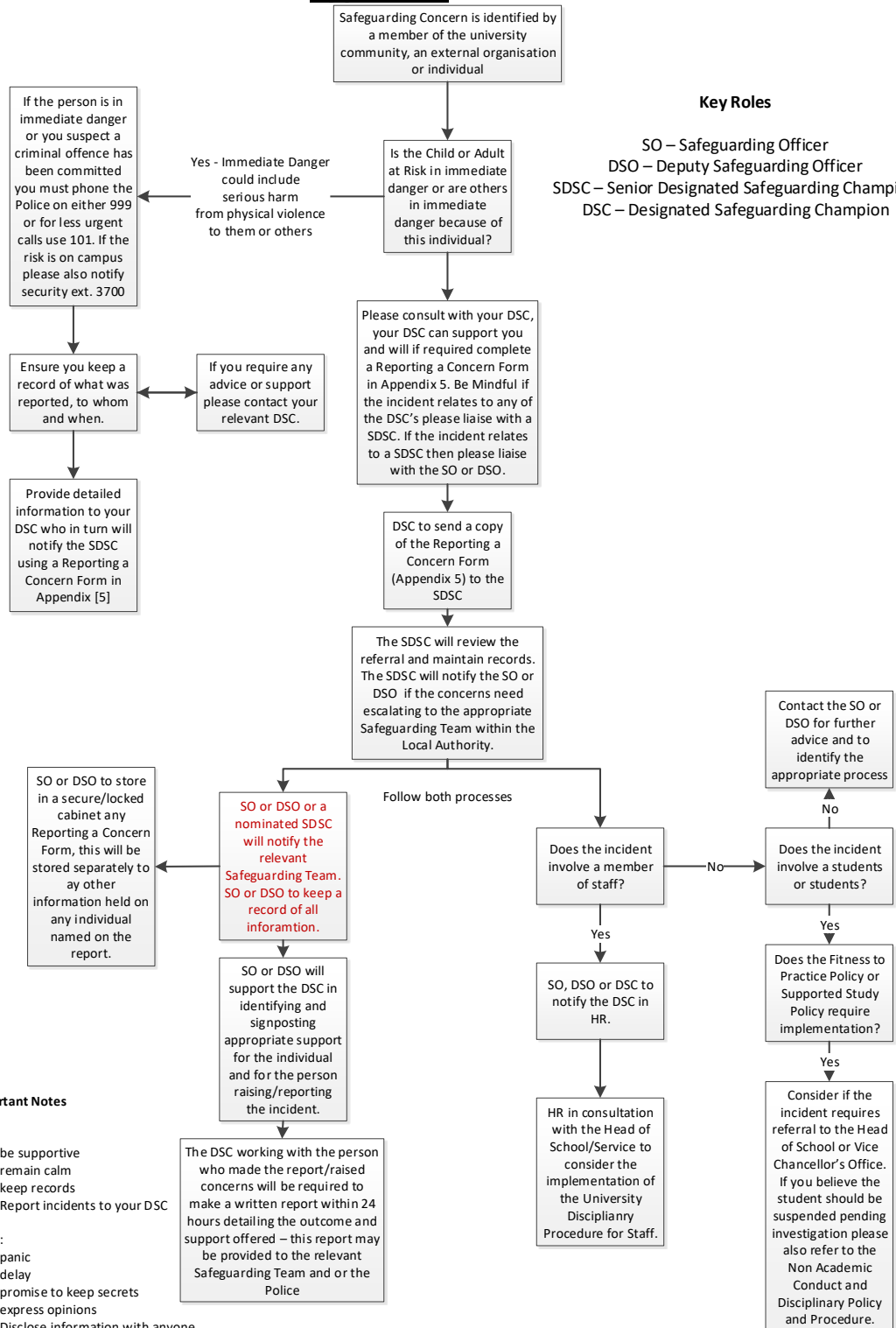
17.2 Bolton's Safeguarding Adult Board has a vision that all agencies will work together so that adults experiencing, or at risk of abuse or neglect should be able to live a life free from harm, abuse and exploitation. An online manual is available at the link below to provide all the guidance needed for staff working to safeguard adults experiencing, or at risk of abuse or neglect including those working in social care services, health, police and other services, and the voluntary sector:

<http://www.proceduresonline.com/bolton/asg/>

18 Equality Check

The University is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to the protected characteristics of race, sex, disability, age, sexual orientation, religion or belief, gender reassignment, marriage and civil partnership, pregnancy and maternity.

Appendix 1



Key Roles

- SO – Safeguarding Officer
- DSO – Deputy Safeguarding Officer
- SDSC – Senior Designated Safeguarding Champion
- DSC – Designated Safeguarding Champion

Important Notes

- Do:
- be supportive
 - remain calm
 - keep records
 - Report incidents to your DSC
- Don't:
- panic
 - delay
 - promise to keep secrets
 - express opinions
 - Disclose information with anyone other than designated staff
 - Investigate
 - ask leading questions

Appendix 2

Definition of Abuse (Guidance non-exhaustive lists)

Children

Abuse

1 Abuse is a form of maltreatment and can take a number of forms. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. There are four categories of abuse which are relevant for the purposes of registration on the child protection register and these are:

1.1 **Physical abuse** is a form of abuse which may involve:

- (i) beating;
- (ii) hitting;
- (iii) pushing;
- (iv) shaking;
- (v) kicking;
- (vi) throwing;
- (vii) pinching;
- (viii) biting;
- (ix) choking;
- (x) hair-pulling;
- (xi) burning with cigarettes, scalding water or other hot objects; or
- (xii) severe physical punishment.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

1.2 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening and which may involve:

- (i) Fondling, touching or kissing a child's genitals or making a child fondle an adult's genitals;
- (ii) violations of bodily privacy, such as forcing the child to undress or spying on a child in the bathroom or bedroom;
- (iii) using a child in the production of pornography, such as a film or magazine or exposing children to pornography;
- (iv) luring a child for sexual liaisons, through the internet or by any other means; or
- (v) sexual exploitation such as using a child to perform sex with others or sexual acts with a child, penetration, intercourse, incest, rape, oral sex.

1.3 **Neglect** is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's

health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse or, once a child is born, it may involve:

- (i) failing to provide adequate food or clothing;
- (ii) failing to protect a child from physical and emotional harm or danger;
- (iii) failing to ensure adequate supervision, including using inadequate people to provide care;
- (iv) failing to ensure access to appropriate medical care or treatment; or
- (v) being unresponsive to a child's emotional needs.

1.4 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development and which may involve:

- (i) ignoring;
- (ii) withdrawal of attention;
- (iii) rejection;
- (iv) threatening or frightening;
- (v) serious bullying (including cyberbullying);
- (vi) belittling such as telling the child he or she is "no good", "worthless", "bad", or "a mistake";
- (vii) using extreme forms of punishment, such as confinement to a closet or dark room; or
- (viii) witnessing the physical abuse of others.

2 The above definitions, provided for guidance purposes only, indicate acts (or omissions) which may constitute abuse. They are as relevant in the context of vulnerable adults as they are with children. They should not be considered exhaustive and if any member of University staff, student or visitor to the University (where appropriate) has any concerns about a child or vulnerable adult they should raise these concerns with the appropriate individual in accordance with these procedures.

Adults

Abuse

3 Abuse can take a number of forms. There are ten categories of abuse which are relevant for the purposes of adults at risk.

3.1 **Physical abuse** which may involve:

- (i) assault;
- (ii) hitting;
- (iii) punching;
- (iv) slapping;
- (v) kicking;
- (vi) throwing;
- (vii) pinching;
- (viii) biting;

- (ix) choking;
- (x) hair-pulling;
- (xi) burning with cigarettes, scalding water or other hot objects; or
- (xii) severe physical punishment
- (xiii) making someone purposefully uncomfortable
- (xiv) involuntary isolation or confinement
- (xv) misuse of medication
- (xvi) forcible feeding or withholding food
- (xvii) unauthorised restraint

3.2 **Domestic violence** or abuse

- (i) psychological;
- (ii) physical;
- (iii) sexual;
- (iv) financial;
- (v) emotional.

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- (i) acts of assault, threats, humiliation and intimidation;
- (ii) harming, punishing, or frightening the person;
- (iii) isolating the person from sources of support ;
- (iv) exploitation of resources or money;
- (v) preventing the person from escaping abuse;
- (vi) regulating everyday behaviour.

3.3 **Sexual abuse** can include:

- (i) rape, attempted rape or sexual assault;
- (ii) inappropriate touch anywhere;
- (iii) non- consensual masturbation of either or both persons;

- (iv) non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth;
- (v) any sexual activity that the person lacks the capacity to consent to
- (vi) inappropriate looking, sexual teasing or innuendo or sexual harassment;
- (vii) sexual photography or forced use of pornography or witnessing of sexual acts;
- (viii) indecent exposure.

3.4 Psychological or emotional abuse can include:

- (i) enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- (ii) removing mobility or communication aids or intentionally leaving someone unattended when they need assistance;
- (iii) preventing someone from meeting their religious and cultural needs;
- (iv) preventing the expression of choice and opinion;
- (v) failure to respect privacy;
- (vi) preventing stimulation, meaningful occupation or activities
- (vii) intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse;
- (viii) addressing a person in a patronising or infantilising way
- (ix) threats of harm or abandonment
- (x) cyber bullying.

3.5 Financial or material abuse can include:

- (i) theft of money or possessions;
- (ii) fraud, scamming;
- (iii) preventing a person from accessing their own money, benefits or assets;
- (iv) employees taking a loan from a person using the service;
- (v) undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions

- (vi) arranging less care than is needed to save money to maximise inheritance;
- (vii) denying assistance to manage/monitor financial affairs;
- (viii) denying assistance to access benefits;
- (ix) misuse of personal allowance in a care home;
- (x) misuse of benefits or direct payments in a family home;
- (xi) someone moving into a person's home and living rent free without agreement or under duress;
- (xii) false representation, using another person's bank account, cards or documents;
- (xiii) exploitation of a person's money or assets, e.g. unauthorised use of a car;
- (xiv) misuse of a power of attorney, deputy, appointeeship or other legal authority;
- (xv) rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

3.6 **Modern Slavery** can include:

- (i) human trafficking;
- (ii) forced labour;
- (iii) domestic servitude;
- (iv) sexual exploitation, such as escort work, prostitution and pornography;
- (v) debt bondage – being forced to work to pay off debts that realistically they never will be able to.

3.7 **Discriminatory abuse** can include:

- (i) unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation;
- (ii) verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic;
- (iii) denying access to communication aids, not allowing access to an interpreter, signer or lip-reader;

- (iv) harassment or deliberate exclusion on the grounds of a protected characteristic;
- (v) denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic;
- (vi) substandard service provision relating to a protected characteristic.

3.8 Organisational or institutional abuse can include:

- (i) discouraging visits or the involvement of relatives or friends;
- (ii) run-down or overcrowded establishment;
- (iii) authoritarian management or rigid regimes;
- (iv) lack of leadership and supervision;
- (v) insufficient staff or high turnover resulting in poor quality care;
- (vi) abusive and disrespectful attitudes towards people using the service;
- (vii) inappropriate use of restraints;
- (viii) lack of respect for dignity and privacy;
- (ix) failure to manage residents with abusive behaviour;
- (x) not providing adequate food and drink, or assistance with eating;
- (xi) not offering choice or promoting independence;
- (xii) misuse of medication;
- (xiii) failure to provide care with dentures, spectacles or hearing aids;
- (xiv) not taking account of individuals' cultural, religious or ethnic needs;
- (xv) failure to respond to abuse appropriately;
- (xvi) interference with personal correspondence or communication;
- (xvii) failure to respond to complaints.

3.9 Neglects and acts of omission can include:

- (i) failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care;
- (ii) providing care in a way that the person dislikes;
- (iii) failure to administer medication as prescribed;
- (iv) refusal of access to visitors;
- (v) not taking account of individuals' cultural, religious or ethnic needs;
- (vi) not taking account of educational, social and recreational needs;
- (vii) ignoring or isolating the person;

- (viii) preventing the person from making their own decisions;
- (ix) preventing access to glasses, hearing aids, dentures, etc.
- (x) failure to ensure privacy and dignity.

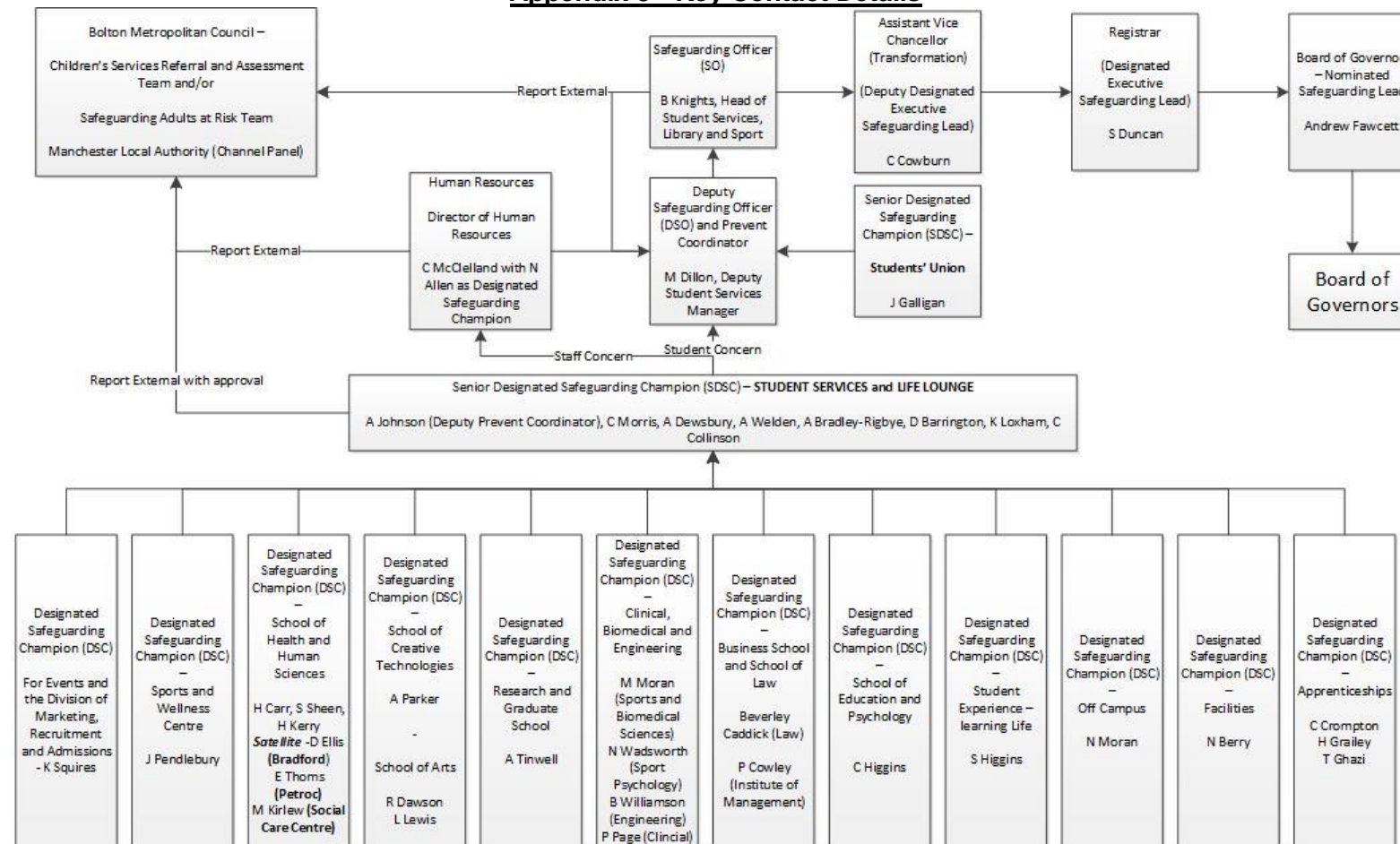
3.10 **Self Neglect** can include:

- (i) lack of self-care to an extent that it threatens personal health and safety;
- (ii) neglecting to care for one's personal hygiene, health or surroundings;
- (iii) inability to avoid self-harm
- (iv) failure to seek help or access services to meet health and social care needs;
- (v) inability or unwillingness to manage one's personal affairs.

3.11 **Exploitation** can include:

- (i) either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain (also see modern slavery)

Appendix 3 - Key Contact Details



Appendix 4

Code of Behaviour and Good Practice in relation to Safeguarding Children or Adults at Risk

- 1 The University believes that:
 - 1.1 all children, adults at risk, University staff, students and visitors should be treated with respect;
 - 1.2 all activities involving children and adults at risk should have more than one adult present or at least that one is within sight or hearing of others;
 - 1.3 respect should be given to a child's or adults at risk rights to personal privacy;
 - 1.4 in all activities, University staff and students, and visitors to the University where appropriate, should be aware that physical contact with a child or young person may be misinterpreted;
 - 1.5 in all activities, University staff and students, and visitors to the University where appropriate, should recognise that special caution is required when discussing sensitive issues with children or adults at risk;
 - 1.6 where any physical touching is required, it should be provided openly and if this is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body;
 - 1.7 in activities, feedback should be constructive rather than negative;
 - 1.8 in all activities, University staff and students, and visitors to the University where appropriate, are required to challenge unacceptable behaviour in accordance with the provisions of these procedures; and
 - 1.9 any allegations or suspicions of abuse should be reported immediately to a DSC.
- 2 In all dealings with children and adults at risk, University staff and students, and visitors to the University where appropriate, should never:
 - 2.1 play rough physical games or sexually provocative games;
 - 2.2 share a room overnight with a child or vulnerable adult;
 - 2.3 enter the private room of a child or adult at risk unless it is absolutely necessary and if entering such a room must do so accompanied;
 - 2.4 allow or engage in any form of inappropriate touching;
 - 2.5 form or seek to form relationships of a sexual nature or which may lead to sexual activity (ie "grooming");

- 2.6 allow children or adults at risk to use inappropriate language without challenging it;
- 2.7 make sexually suggestive comments even in jest;
- 2.8 reduce a child or adult at risk to tears as a form of control;
- 2.9 allow allegations made by a child or adult at risk to go unrecorded or not acted upon in accordance with these procedures; and/or
- 2.10 do personal activities (such as washing or dressing) for a child or adult at risk which they can do for themselves. If a child has a disability, such tasks should only be performed with the full understanding and consent of the parents/carers. An adult at risk may be able to consent for him/her self.

Appendix 5
UNIVERSITY OF BOLTON

Form for Reporting a concern in relation to safeguarding

(copies of this form are available from the Student Centre or Life Lounge, alternatively you can email the information as required to safeguarding@bolton.ac.uk)

DETAILS OF INDIVIDUAL	
Name/s of child/ adult at risk (if the person is a student please include the student number)	
Date of birth/s (if child):	
Gender/s: (M/F)	
DETAILS OF INCIDENT	
Time and date of incident:	
Your account of what happened:	
The child/vulnerable adult's account of what happened:	
Description of any visible bruising or other injuries:	
Any other observations/information:	
Name and contact details of any witnesses:	
Initial action taken:	
DETAILS OF PERSON COMPLETING THE FORM	
Signed:	
Name (print):	
Position:	
Date:	
Contact details:	

Please return completed forms to the **Senior Designated Safeguarding Champions** - safeguarding@bolton.ac.uk

Appendix 6

Examples of incidents which should be reported

- 1 Below are examples of incidents which are to be reported. When:
 - 1.1 a child or adult at risk is accidentally hurt;
 - 1.2 there is a concern that a relationship is developing which may be an abuse of trust;
 - 1.3 you are worried that a child or adult at risk is becoming attracted to you;
 - 1.4 you are worried that a child or adult at risk is becoming attracted to a colleague who cares for them;
 - 1.5 you think a child or adult at risk has misunderstood or misinterpreted something you have done;
 - 1.6 you have been required to physically restrain a child or adult at risk to prevent them from harming themselves or another or from causing significant damage to property;
 - 1.7 you receive a report from a child or adult at risk alleging abuse regarding a member of an external organisation using University facilities;
 - 1.8 you see any suspicious marks on a child or adult at risk;
 - 1.9 you hear of any allegations made by a child or adult at risk of events outside the University;
 - 1.10 you have been provided with information that suggests a student or staff member is putting a child or adult at risk outside of the University i.e. a student through their actions or lack of is putting their child at risk;
 - 1.11 you are concerned that a member of the university community is being drawn into terrorist or extremist groups/activities.

The above examples are provided for guidance purposes only. They are as relevant in the context of adults at risk as they are with children. They should not be considered exhaustive and if any member of University staff, student or visitor to the University (where appropriate) has any concerns about a child or adult at risk they should raise these concerns with the appropriate individual in accordance with these procedures.

Appendix 7

Responding to allegations

The following table provides some useful dos and don'ts about handling allegations (which has been taken from Safeguarding Children: Guidance for English Higher Education Institutions (HEIs) prepared by the (then) Department for Innovation, Universities & Skills)

DO	DON'T
<ul style="list-style-type: none"> • be supportive 	<ul style="list-style-type: none"> • panic
<ul style="list-style-type: none"> • take what the young person says seriously 	<ul style="list-style-type: none"> • delay
<ul style="list-style-type: none"> • remain calm 	<ul style="list-style-type: none"> • promise to keep secrets
<ul style="list-style-type: none"> • reassure the child/young person that it was right to tell someone 	<ul style="list-style-type: none"> • ask leading questions
<ul style="list-style-type: none"> • use language the child/young person understands 	<ul style="list-style-type: none"> • ask the child/young person to repeat the story unnecessarily
<ul style="list-style-type: none"> • explain what will happen next 	<ul style="list-style-type: none"> • express any opinions about what you are told
<ul style="list-style-type: none"> • write down immediately afterwards what was said, including the time, place and any other observations: sign and date the record. 	<ul style="list-style-type: none"> • discuss the disclosure with anyone other than the DSO and other relevant personnel
<ul style="list-style-type: none"> • pass the report to the DSO and, if you are in a school/college or other HEI, pass a copy to the DSO of that organisation 	<ul style="list-style-type: none"> • start to investigate
<ul style="list-style-type: none"> • remember that you need support. Seek advice and support for yourself. 	

Appendix 8

Key Contacts

Key University Contacts

<u>Safeguarding Officer (SO)</u>	Beverley Knights Email: bap1@bolton.ac.uk Telephone number: 01204 903402	
<u>Deputy Safeguarding Officer (DSO) and Prevent Coordiantor</u>	Matthew Dillon Email: mdd1@bolton.ac.uk Telephone: 01204 903498	
Senior Designated Safeguarding Champions (SDSC)	VACACNT – Student Mental Health and Wellbeing Manager	Email: Telephone number:
	Adam Johnson (Deputy Prevent Coordinator)	Email: A.Johnson@bolton.ac.uk Telephone number: 01204 903621
	Christina Morris	Email: C.Morris3@bolton.ac.uk Telephone number: 01204 903829
	VACANT Mental Health Advisor	Email: Telephone number:
	VACANT Mental Health Advisor	Email: Telephone number:
	David Barrington	Email: D.Barrington@bolton.ac.uk Telephone number: 01204 903566
	Arnold Welden	Email: A.Welden@bolton.ac.uk Telephone number: 01204 903144
	Amanda Bradley-Rigbye	Email: A.Bradley-Rigbye@bolton.ac.uk Telephone number: 01204 903240
	VACANT Disability	Email:

	Team Leader	Telephone number:
	Kay Loxham	Email: K.J.Loxham@bolton.ac.uk Telephone number:01204 903229
	Chris Collinson	Email: C.Collinson@bolton.ac.uk Telephone number: 01204 903540
	VACANT Student Liaison Officer	Email: Telephone number:
Designated Safeguarding Champions (DSC)	Jason Pendlebury (Sport)	Email: J.Pendlebury@bolton.ac.uk Telephone number: 01204 903577
	Saul Higgins - Student Experience (Student Life)	Email: S.Higgins@bolton.ac.uk Telephone number: 01204 903770
	Kelly Squires (Events and Division of Marketing and UG Recruitment and Admissions)	Email: K.Squires@bolton.ac.uk Telephone Number: 01204 903806
	Hayley Carr (School of Nursing and Midwifery)	Email: H.Carr@bolton.ac.uk Telephone number: 01204 903282
	Danielle Ellis (Health and Human Sciences – Bradford College Satellite Centre)	Email: D.Ellis@bolton.ac.uk Telephone number: TBC
	Emma Thoms (Health and Human Sciences – Petroc College Satellite Centre)	Email: E.Thoms@bolton.ac.uk Telephone number: TBC
	Martina Kirlew – Social Work Centre, Queens (Health and Human Sciences)	Email: M.Kirlew@bolton.ac.uk Telephone number: 01204 903782

	Sheryl Sheen - (School of Nursing and Midwifery)	Email: S.Sheen@bolton.ac.uk Telephone number: 01204 903846
	Hannah Kerry - (School of Nursing and Midwifery)	Email: H.Kerry@bolton.ac.uk Telephone number:
	Andrew Parker (School of Creative Technology)	Email: A.Parker@bolton.ac.uk Telephone number: 01204 903467
	Rachel Dawson (School of Arts)	Email: R.Dawson@bolton.ac.uk Telephone number: 01204 903374
	Leanne Lewis (School of Arts)	Email: L.Lewis@bolton.ac.uk Telephone number: 01204 903379
	Angela Tinwell (Research and Graduate School)	Email: A.Tinwell@bolton.ac.uk Telephone number: 01204 903589
	Mark Moran (Sports and Biomedical Sciences)	Email: M.Moran@bolton.ac.uk Telephone number: 01204 903114
	Brian Williamson (Engineering)	Email: B.Williamson@bolton.ac.uk Telephone number: 01204 903725
	Beverley Caddick (School of Law)	Email: B.Caddick@bolton.ac.uk Telephone number: 01204 903976
	Paul Cowley (Business School)	Email: P.Cowley@bolton.ac.uk Telephone number: 01204 903773
	Clare Higgins (School of Education and Psychology)	Email: C.Higgins@bolton.ac.uk Telephone number: 01204 903316
	Neil Moran (Off Campus)	Email: N.Moran@bolton.ac.uk Telephone number: 01204 903627

	Shameela Atcha (Division of International & Postgraduate (Taught) Development)	Email: S.Atcha@bolton.ac.uk Telephone number:
	Nick Wadsworth (School of Clinical & Biomedical Sciences)	Email: N.Wadsworth@bolton.ac.uk Telephone number: 01204 903887
	Pip Page (School of Clinical & Biomedical Sciences)	Email: P.Page@bolton.ac.uk Telephone number:
	Neil Berry (Facilities)	Email: N.Berry@bolton.ac.uk Telephone number: 01204 903585
	Charlotte Crompton (Apprenticeships)	Email: C.Crompton@bolton.ac.uk Telephone:
	Helen Grailey (Apprenticeships)	Email: H.Grailey@bolton.ac.uk Telephone number: 01204 903620
	Tahmi Ghazi (Apprenticeships)	Email: T.Ghazi@bolton.ac.uk Telephone number: 01204 903622
Designated Executive Safeguarding Lead	Sue Duncan Email: S.Duncan@bolton.ac.uk Telephone number: 01204 903058	
Deputy Designated Executive Safeguarding Lead	Caroline Cowburn Email: C.Cowburn@bolton.ac.uk Telephone number: 01204 903032	

<p>Executive Director of HR</p>	<p>Chris McClelland Email: C.McClelland@bolton.ac.uk Telephone number: 01204 903572</p>
<p>Chair of Governors</p>	<p>Professor His Honour William Morris via Pat Foster Email: P.A.Foster@bolton.ac.uk Telephone number: 01204 903491</p>
<p>Nominated Safeguarding Governor</p>	<p>Name: Andrew Fawcett via Pat Foster Email: P.A.Foster@bolton.ac.uk Telephone number: 01204 903491</p>

Key external contacts

<p>Designated Officer(s) of the Local Authority</p>	<p>Paula Williams</p> <p>Bolton Safeguarding Children Board Westhoughton Town Hall Market Street Westhoughton BL5 3AW</p> <p>Telephone number: 01204 337474</p> <p>Email: boltonsafeguardingchildren@bolton.gov.uk</p>
<p>Bolton Metropolitan Borough Council Multi Agency Screening and Safeguarding</p>	<p>Telephone number: 01204 331500</p> <p>Email: R&A@bolton.ac.uk</p> <p>Out of hours emergency: 01204 337777</p>
<p>Bolton Safeguarding Adults Board</p>	<p>Telephone number: 01204 3370000</p> <p>Email: safeguardingadults@bolton.gov.uk</p>
<p>Bolton Safeguarding Children Board</p>	<p>Bolton Safeguarding Children Board Westhoughton Town Hall Market Street Westhoughton BL5 3AW</p> <p>Telephone number: 01204 337479</p> <p>Email: boltonsafeguardingchildren@bolton.gov.uk</p>
<p>FGM reporting - non-emergency police contact number</p>	<p>101</p>
<p>Police liaison officer/University point of contact</p>	<p>PC Rick Charleswoth Bolton Town Centre Neighbourhood Policing Team Police Office Howell Croft Le Mans Crescent, Bolton.</p> <p>Telephone number: 01204 386282</p> <p>Email: bolton.neighbourhoodteam@gmp.police.uk</p>

<p>Prevent partners and advice about extremism</p>	<p>Channel Police Practitioner</p> <p>Name: North West Counter Terrorism Unit (NWCTU) Please contact either Beverley or Knights Safeguarding Officer or Matt Dillon Deputy Safeguarding Officer for contact details for NWCTU.</p> <p>Channel Local Authority Chair</p> <p>Liam Twigg Channel Coordinator Manchester City Council Level 5, Bridgewater House Whitworth Street Manchester M1 6TL</p> <p>Focused Authority areas: Bolton, Salford and Wigan.</p> <p>Tel: 0161 227 3543 (int:43543)</p> <p>Work mobile: 07971385238</p> <p>E-mail: Liam.Twigg@manchester.gov.uk</p> <p>Non-emergency DfE advice</p> <p>020 7340 7264</p> <p>counter-extremism@education.gsi.gov.uk</p>
<p>UK Safer Internet Centre</p>	<p>0344 381 4772</p> <p>helpline@saferinternet.org.uk</p>
<p>NSPCC whistleblowing helpline</p>	<p>Weston House 42 Curtain Road London EC2A 3NH</p>

	<p>Telephone: 0800 028 0285</p> <p>Email: help@nspcc.org.uk</p> <p>https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/</p>
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Safeguarding Policy and Procedures: Children and Vulnerable Adults	
Procedure Ref : StuSer/01	
Version Number	9
Version Date	23 Mar 2020
Name of Developer/Reviewer	Head of Student Services, Library and Sport & Deputy Student Services Manager
Procedure Owner (School/Centre/Unit)	Student Services
Person responsible for implementation (post holder)	Assistant Vice-Chancellor (Transformation)
Approving Committee/Board	Board of Governors
Date approved	31 Mar 2020
Effective from	Mar 2016
Dissemination Method (e.g. website)	Staff and Student web pages
Review Frequency	Annually or as required
Reviewing Committee	Executive Team
Document History (e.g. rationale for and dates of previous amendments)	<p>Consultation has taken place with all Heads of Schools, several Heads of Support Services, HR and the SU throughout March 2016. Technical update November 2016 to account for the inclusion of apprentices. Technical Update June 2017 to add a DSC Technical Update March 2018 to change a DSC.</p> <p>Technical Update March 2019 to change a DSC, Amian to Vivup and additional details of Board of Governors responsibilities and change of Vulnerable Adult to Adult at Risk</p> <p>Technical Update November 2019 to include the role of SDSC, minor change of reporting structure, inclusion of contact details (internal and external)</p> <p>External Health Check – VVW November 2019 – minor changes to wording, updated DPA/GDPR, reorganisation, updated details of sharing information with other organisations. Reviewed in accordance with Ofsted Requirements. Consultation has taken place with HR.</p>