

**ULSTER UNIVERSITY
POLICY FOR THE PROTECTION OF CHILDREN
AND VULNERABLE ADULTS**

Table of Contents

1.	Introduction	2
2.	Aims of the Policy	2
3.	Legal Background.....	2
4.	Duties of the University	3
5.	Definition of Abuse.....	4
6.	Designated Officers and Campus Coordinators.....	5
7.	Reporting of a Disclosure	6
8.	Reporting of a Concern.....	6
9.	Recruitment	7
10.	Change in Role of Existing Ulster Staff member/volunteer	7
11.	Contractors	7
12.	Safety	8
13.	Children as Research Subjects.....	8
14.	Sporting Activities	8
15.	Photographs and Images.....	8
16.	Investigations.....	9
17.	Post-Investigation Procedure.....	9
18.	Risk Assessment and Insurance.....	9
19.	Policy Implementation.....	10
20.	Training.....	10
21.	Policy and Procedure Review	10
	Appendix A: Helpful Links	11
	Appendix B: Child Protection Procedures Risk and Issue Checklist	12
	Appendix C: Reporting Pro-Forma	19
	Appendix D: Code of Behaviour	21

Please contact the Office of the University Secretary if you require this Policy in an alternative format or language

1. Introduction

Whilst the University owes a duty of care to all its students, it also has a particular responsibility to safeguard vulnerable groups including the welfare of children (any individual under the age of eighteen) and vulnerable adults. This responsibility applies whether the individual is a student of the University or is otherwise under the care or supervision of University staff. Vulnerable individuals may be present on the University premises or under the supervision or direction of University staff in a wide number of circumstances including for example:

- University students under the age of eighteen
- Attending summer schools
- Using sports facilities
- Work experience placements or temporary employees
- Brought on site by parents during school holidays
- Living in halls over the holiday period (e.g. as part of school party)
- Attending open days as potential student applicants
- Attending interviews for admission to the University
- As subjects of academic research
- As visitors for any other reason

Children and vulnerable adults may be accompanied by a responsible adult, e.g. a teacher or parent, but in other circumstances they may be unaccompanied.

For most of the University's requirements the focus of this Policy will be on the University's care in relation to children but where appropriate the Policy will also apply to vulnerable adults as defined under [The Safeguarding Vulnerable Groups \(Northern Ireland\) Order 2007](#) (as amended by the Protection of Freedoms Act 2012).

2. Aims of the Policy

The aim of this Policy is to promote best practice in safeguarding within the University and to set out a procedural framework to ensure that:

- the University protects children under its care or supervision
- University staff and volunteers are equipped to make informed and confident responses to specific child protection issues
- University management are equipped to make appropriate decisions in the event of specific child protection concerns arising
- the University takes proactive steps in recruitment and in other areas to minimize risk with regard to child protection

3. Legal Background

The central legal framework in respect of the welfare of children is set out in the [Children \(NI\) Order 1995](#). [The Safeguarding Vulnerable Groups \(Northern Ireland\) Order 2007](#) (as amended by the Protection of Freedoms Act 2012) provided for the establishment of the new Disclosure and Barring Service (DBS), a merger of the

Independent Safeguarding Authority (ISA) and the Criminal Records Bureau (CRB) which has become operational since December 2012. The DBS has responsibility for maintaining the list of individuals barred from engaging in regulated activity with vulnerable groups making decisions as to whether a person should be included in one or both of the children/adults barred lists. The DBS also takes decisions as to whether to remove an individual from a barred list. Any members of the University working in a regulated position with vulnerable groups will require an enhanced AccessNI disclosure with a barred list check. It is against the law to knowingly permit a barred individual to work in a regulated position.

The University must refer to the DBS anyone who has harmed or poses a risk of harm to a child and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether the person is unsuitable to work with vulnerable groups and make a decision as to whether the person should be barred from working in regulated activity with children, or adults, or both. Referrals should be forwarded in the first instance to the University's Secretary –

Mr Eamon Mullan, University Secretary

Room J313, Ulster University, Cromore Road, Coleraine, BT52 1SA

Telephone: 028 7012 3502

Email: e.mullan@ulster.ac.uk

Detailed guidance on the definition of regulated activity with children and vulnerable adults is available on the website of the Department of Health at: <https://www.health-ni.gov.uk/articles/safeguarding-vulnerable-groups-disclosure-and-barring-service>

4. Duties of the University

The University must ensure that:

- allegations made or concerns reported by children or others to University staff and volunteers are dealt with appropriately by the institution
- all staff, students and volunteers who work with children have sufficient clearance (following criminal record and similar checks through [Access NI](#))
- investigations into reported concerns or allegations are carried out in a proper and timely manner
- the police, social services, the DBS and other statutory agencies are kept informed where necessary - including where appropriate, referral to the police of misconduct in relation to children whether or not the misconduct is in the course of an individual's employment

Staff, students and volunteers have a responsibility at all times to:

- refrain from any inappropriate behaviour towards children or vulnerable adults
- avoid situations which could give rise to allegations of abuse
- report bullying of children or vulnerable people
- report disclosures of abuse or concerns they may have that a child or vulnerable person may have been subject to abuse

Any member of staff, student or volunteer found to have committed any act of abuse towards a child or vulnerable person will be subject to disciplinary proceedings. The person may also be the subject of criminal proceedings or registration on a statutory child/vulnerable adult protection list. Further guidance is available in the Code of Behaviour attached at Appendix D below.

In addition any member of staff, volunteer or student found by the University to have inappropriate images of children (or inappropriate verbal or electronic communications with children) will be subject to disciplinary proceedings and the University will inform the police and other statutory agencies as appropriate. Anyone with concerns in this regard about a member of staff, student or volunteer must report the matter immediately to the Child Protection Co-ordinator based nearest the reported incident. Contact details for Child Protection Co-ordinators are available under point 6 of this Policy.

5. Definition of Abuse

Both the terms “abuse” and “harm” are used regularly in the context of child protection. The [Protection of Children and Vulnerable Adults \(NI\) Order 2003](#) defines harm as ill-treatment or impairment of a child’s mental or physical health or development. The following categories of abuse in particular would constitute “harm”:

- i) **Physical abuse** – is the deliberate physical injury to a child or the wilful or neglectful failure to prevent physical injury or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. For children with disabilities it may include confinement to a room or cot, or incorrectly given drugs to control behaviour.
- ii) **Emotional abuse** – is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corrupting of children.
- iii) **Sexual abuse** – involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- iv) **Neglect** – is the persistent failure to meet a child’s physical and/or psychological needs, likely to result in significant harm. It may involve failure to provide adequate foods, shelter and protection from physical harm or danger, and failing to ensure adequate medical care in case of injury and a lack of stimulation and supervision.

Concerns that a child has been harmed (or is at risk of being harmed) must be reported to the Designated Child Protection Officer even where the child is aged 16 years or older, and irrespective of whether the child has been said to have given consent.

6. Designated Officers and Campus Coordinators.

The University's Designated Child Protection Officer is:

Mr Eamon Mullan, University Secretary

Room J313, Ulster University, Cromore Road, Coleraine, BT52 1SA

Telephone: 028 7012 3502

Email: e.mullan@ulster.ac.uk

The Designated Child Protection Officer will have the primary responsibility for implementing this policy, advising staff on child protection procedures, and liaising with other agencies where appropriate. The Designated Deputy will assume his/her responsibilities when the Designated Child Protection Officer is absent. The Designated Child Protection Officer and Deputy will have appropriate clearance against criminal records and the statutory child/vulnerable adult protection lists. Particular duties of these officers will include:

- facilitating staff and volunteer training on child protection procedures and ensuring that Campus Co-ordinators are kept up to date with legal and policy developments in respect of the welfare of children and vulnerable adults
- ensuring necessary risk assessments are carried out and appropriate safety measures taken
- ensuring the University is sufficiently insured for activities involving children
- ensuring appropriate checks are made on staff, students and volunteers who are considered to be working in a regulated position with children or in a care position with vulnerable adults ([Access NI](#))
- ensuring records pertaining to child protection matters are kept secure, up to date and compliant with data protection and other legal requirements

Because of the distributed nature of the University's campuses, each campus will have a designated campus Child Protection Co-ordinator. The Provosts will undertake this role:

i) Belfast and Jordanstown

Professor Raffaella Folli (Provost Belfast and Jordanstown)

Room BA-05-014, Ulster University, York Street, Belfast, BT15 1ED

Telephone: 028 9536 7574

Email: r.folli@ulster.ac.uk

ii) Coleraine

Dr Karise Hutchinson (Provost Coleraine)

Room H234, Ulster University, Cromore Road, Coleraine, BT52 1SA

Telephone: 028 7012 4790

Email: kc.hutchinson@ulster.ac.uk

- iii) Magee
Dr Malachy O'Neill (Provost Magee)
Room MA023, Ulster University, Northland Road, Derry/Londonderry, BT48 7JL
Telephone: 028 7167 5563 Email: mf.oneill@ulster.ac.uk

The Campus Co-ordinators will be responsible for:

- Receiving in the first instance reports from staff or students of incidents, allegations or concerns that a child or vulnerable adult may be at risk or may have been harmed.
- Assuring any person making a report that appropriate action will be taken and advising them what steps to take (or not take) until notified further by the University or the appropriate authorities
- Notifying the Designated Child Protection Officer or Deputy and as appropriate the police and/or other statutory agencies
- Advocating best child protection practice throughout their designated campus and liaising with faculties and departments, raising compliance issues where appropriate.

7. Reporting of a Disclosure

When abuse is disclosed to a member of staff, student or volunteer, he or she **must**:

- (i) Inform whoever has made the disclosure that the information cannot be kept completely confidential as it will have to be passed on to the appropriate authorities.
- (ii) Listen carefully to what is being said and record the details in writing as soon as possible ensuring that the record is kept safe and secure.
- (iii) Inform the relevant Campus Co-ordinator about the disclosure immediately (within 24 hours). The Co-ordinator will treat the matter as an urgent priority and will liaise with the Designated Child Protection Officer. The relevant Report Pro-Forma is attached at Appendix C on page 19 of this Policy.
- (iv) Not take any further action or discuss the matter further with anyone else unless advised otherwise.

The person who made the original disclosure will be kept informed about the post-disclosure process, so that they can be reassured about what to expect.

Where an adult makes a disclosure of abuse that occurred during his or her childhood, that disclosure must also be reported to the Campus Co-ordinator or Designated Child Protection Officer, as the (alleged) abuser may still pose a risk to children.

8. Reporting of a Concern

Where abuse is not necessarily disclosed but a member of staff, student or volunteer is otherwise concerned that a child is being abused, he or she **must**:

- (i) Inform the Designated Child Protection Officer or relevant Campus Co-ordinator about their concern immediately. The matter will be treated as an urgent priority.
- (ii) Not take any further action or discuss the matter further with anyone else unless advised otherwise.

9. Recruitment

Before recruiting a new member of staff or volunteer, the University must satisfy itself as to:

- (i) Whether the post is a regulated position or care position as defined by the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007.
- (ii) Whether all appropriate checks relating to criminal records, statutory child/vulnerable adult protection lists, qualifications, employment history and employer references have been undertaken.

For staff whose normal duties involve working in a regulated position with children, checks against statutory lists of those considered unsuitable to work with children and criminal record checks **must** be undertaken.

- (iii) If, having made such checks, information comes to light which reveals the applicant is disqualified from working with children or the subject of a disqualification order this individual should not be employed. Applicants may have a criminal record and any convictions should be considered to assess whether there is a risk to children. If it is considered the applicant will pose a risk that person's application must be rejected.

An application by someone on a statutory disqualification list to a post which involves working with children is in itself a criminal offence, as may be knowingly employing such a person.

10. Change in Role of Existing Ulster Staff member/volunteer

If an existing member of staff or volunteer is to take a new role or adopt responsibilities in respect of working with children and vulnerable adults, then appropriate checks of criminal records and statutory child/vulnerable adult protection lists will be undertaken.

The University will also undertake a review to confirm whether staff in existing roles who currently work with children have appropriate clearance against criminal record databases and statutory protection lists, and where necessary conduct such checks in a timely and organised manner.

11. Contractors

Persons working in a regulated position who are not directly employed by the University - but are employed by contractors (or sub-contractors) - will also undergo criminal record clearance and checks against the statutory child protection/vulnerable adult lists. However, these checks will have to be carried out by

their employer - and the University will ensure that these obligations are reflected where possible in any contract between the University and the contractor. Contract staff without such clearance will not be permitted unsupervised access to children under any circumstances.

12. Safety

University management has a responsibility to ensure that University premises are safe for staff, students and visitors. All staff share a responsibility to take reasonable care of the safety of those around them, and will be familiar with the University's Health and Safety policy. Failure to follow health and safety procedure may affect the University's legal liability and any insurance claim by the University in the event of personal injury caused to or by children.

It must be always borne in mind that children will tend to be less careful than adults, and that when staff or volunteers direct children outside of University premises there will be additional matters to be taken into consideration (such as if children are in large groups). Staff bringing their own children onto premises must remain responsible for their children at all times, and must bear in mind that parts of the premises may pose hazards. Staff and students are advised not to bring young children onto University premises unless absolutely necessary.

Where any accident occurs, a detailed record of the incident must be logged or recorded as soon as possible after the event. All incidents must be reported to the University's Health and Safety department, who will liaise with the Designated Child Protection Officer accordingly.

13. Children as Research Subjects

Occasionally, children may attend University premises and/or be supervised by University Staff for research purposes. Parental consent for children under sixteen years of age must be obtained before any research activity is conducted with them. Children of sixteen years or older can give their own consent. Any research activity will respect the child's right to confidentiality, and comply with any relevant code of ethics applicable to the type of research being conducted. Researchers must undergo checks against criminal records against other statutory child protection lists where the researcher may be working alone with children.

14. Sporting Activities

In addition to this Policy and related Procedures, specific considerations will apply to sporting activities conducted on University premises or directed by University staff, students or volunteers. Sport Northern Ireland has produced detailed guidance on good practice with regard to sport and child protection which will be applied as appropriate within the University.

15. Photographs and Images

There is evidence that people have used events attended by children and vulnerable young persons, particularly sporting events, to take inappropriate images of them in

vulnerable positions. Staff, volunteers and students must be vigilant in such circumstances and should immediately report any concerns to the Campus Co-ordinator or the Designated Child Protection Officer.

There will be occasions where photographs, film or video is required for legitimate purposes such as for teaching purposes, for research or sports coaching. In all such circumstances the children or vulnerable young persons and their parents/guardians/carers must be made aware of this and asked to provide their consent. All such media must be stored securely.

16. Investigations

The University will investigate in a timely and thorough manner any disclosures, reports of abuse or matters arising from recruitment and employment checks. Contemporaneous notes of conversations must be taken where possible, and always kept secure. It is important that staff do not discuss disclosures or reports of abuse with others unless specifically authorised by the Designated Child Protection Officer, by this Policy or by the University's procedures. All students, volunteers or members of the University staff will act in accordance with this Policy and the University's procedures. Failure to do so may result in disciplinary action.

If an allegation against a member of staff, student or volunteer has been made, the Designated Child Protection Officer will seek advice as to what steps will be taken with the member of staff, student or volunteer concerned during the investigation procedure.

17. Post-Investigation Procedure

The Designated Child Protection Officer, having investigated a disclosure, report of abuse or matter arising from recruitment and employment checks, will take appropriate legal and policy advice where necessary and decide accordingly on the correct course of action to take. Any action taken by the University will be co-ordinated where appropriate with the relevant statutory agencies (such as the police, DBS or the Department of Health). Where an investigation confirms a disclosure or report of abuse, the University will act in a timely fashion to implement the necessary course of action.

18. Risk Assessment and Insurance

The Designated Child Protection Officer will:

- (i) work with the University's Health and Safety officers to ensure relevant risk assessments have been conducted for University premises where children may be present, and for specific situations (e.g. Summer Schools or field trips) where University staff or volunteers may be directing or supervising children on or off-site.
- (ii) ensure the University has appropriate insurance against personal injury caused to or by children when on the University's premises.

When planning activities with children or vulnerable adults that may fall outside the University's normal day-to-day activities, staff must check with the Designated Officer whether that activity is covered by the University's insurance policy.

19. Policy Implementation

The University will ensure that this Policy and appropriate procedures are implemented, disseminated and kept under review.

20. Training

University staff and volunteers will be trained appropriately in child protection procedures. The Designated Child Protection Officer will work with line management to identify specific groups of staff, students and volunteers who may require training.

21. Policy and Procedure Review

The Council or its delegated authority will from time to time review this Policy and related procedures, in addition to examining the work of the Designated Child Protection Officer and his/her deputy and the Campus Coordinators. The Council or its delegated authority must satisfy itself that this Policy and the Procedures are fit for purpose and that the Designated Officer duties are being discharged satisfactorily. The Procedure Manual and related arrangements shall be revised where necessary to facilitate the effective implementation of this Child Protection Policy and to reflect changes in Child Protection law when they occur.

Appendix A: Helpful Links

ACCESS NI	https://www.nidirect.gov.uk/campaigns/accessni-criminal-record-checks
BARNARDO'S	http://www.barnardos.org.uk/
CHILD POVERTY ACTION GROUP	http://www.cpag.org.uk
CHILD RIGHTS INTERNATIONAL NETWORK	http://www.crin.org/
CHILDREN'S LAW CENTRE	http://www.childrenslawcentre.org
CHILDREN'S (NORTHERN IRELAND) ORDER 1995	http://www.legislation.gov.uk/nisi/1995/755/contents/made
DATA PROTECTION POLICY – UNIVERSITY OF ULSTER	http://www.ulster.ac.uk/secretary/policyimplementation/dataprotection/data_protection_policy_jan_2015.pdf
DEPARTMENT OF HEALTH CHILD PROTECTION GUIDANCE	https://www.health-ni.gov.uk/topics/social-services/child-protection
DISABILITY ACTION	http://www.disabilityaction.org/
EQUAL OPPORTUNITY POLICY – UNIVERSITY OF ULSTER	https://www.ulster.ac.uk/_data/assets/pdf_file/0016/122902/EO-Policy-2016.pdf
NI COMMISSIONER FOR CHILDREN AND YOUNG PEOPLE	http://www.nickey.org/
NSPCC	http://www.nspcc.org.uk
THE SAFEGUARDING VULNERABLE GROUPS (NORTHERN IRELAND) ORDER 2007 (AS AMENDED BY THE PROTECTION OF FREEDOMS ACT 2012)	http://www.legislation.gov.uk/nisi/2007/1351/contents
SAVE THE CHILDREN	http://www.savethechildren.org.uk/
UNICEF	http://www.unicef.org.uk

Appendix B: Child Protection Procedures Risk and Issue Checklist

The following table provides a checklist of issues to be considered when devising and reviewing Child Protection Procedures.

No	Issue	Potential Risk	Risk Mitigation	✓
1	Legal Compliance	Failure to meet statutory obligations	<p>Procedure complies with Central Government and local inter-agency guidance</p> <p>Procedure complies with other University policies (and that these policies comply with This Policy), e.g.: -</p> <ul style="list-style-type: none"> Bullying and Harassment Policy Equality policies Health and safety Policy IT policy (Internet/Email access and use) Insurance policy Policies relating to disability Policies relating to sport Policies relating to the administration of first aid, medicines and physical treatment Policies relating to visitors and volunteers Policies relating to young persons with special needs Policy on use of physical intervention (restraint) Risk assessments Staff discipline policy Staff training Staff/Student/Public Complaints and Grievance procedure Student attendance policy Student discipline policy Whistle blowing policy 	
2	Implementation	Failure to implement policy	Senior management regularly review policy and ensure pro-active measures are taken to gauge how this policy is being applied throughout the University's departments and campuses	
3	Best Practice	Failure to adopt best practice	<p>Ensure Policy is reviewed regularly and that updated legislation and revised government guidance is reflected in this policy and procedures</p> <p>Ensure relevant stakeholders and departmental officers are consulted</p>	
4	Policy Effectiveness (i)	Failure to implement policy	<p>Effective communication of policy and procedures</p> <p>Appropriate evaluation of policy and implementation</p>	

No	Issue	Potential Risk	Risk Mitigation	✓
5	Policy Effectiveness (ii)	Failure to minimize risk of child abuse or false allegations	<p>Guidance given to staff in appropriate behaviour viz. use of physical intervention</p> <p>Procedures clear that any form of sexual relationship with a student (or other young person in contact with the University) aged under 18 is strictly prohibited and even where the child is 16 or over may still be a criminal offence.</p> <p>Procedures prohibit activities that could be construed as “grooming” e.g. singling out individual students for special favours or sending them text messages</p> <p>Guidance to staff on which behaviours will be avoided and what constitutes safe practice</p> <p>Guidance to staff on how to handle disclosures of abuse or reporting of concerns</p> <p>Copy of University whistle-blowing procedures available to staff</p> <p>Safeguarding related staff meeting agendas and minutes kept accurate and up to date</p> <p>Provide safeguarding helpline and other agency contact information where appropriate</p>	
6	Premises	Failure of procedure viz. access to Premises	<p>Security procedures align with this policy</p> <p>Security staff clear on responsibility</p> <p>Accident / Incident logs updated</p> <p>Concerns by security staff reported to Child Protection Coordinators</p>	
7	Contractors	Failure of procedure viz. employment of staff by contractors / sub-contractors	Where contracts relate to working with, providing services or incidentally grant contractors/sub-contractors access to children, contractors/sub-contractors clear on safeguarding requirements and if possible this is reflected in contracts / confirmed in writing	
8	Third parties visiting University premises	Failure of procedure viz. employment of third parties visiting premises	Ensure that University security and facility access procedures are robust	
9	Sports Specific Policy	Failure to ensure policy tailored where appropriate to specific safeguarding issues in sports	Ensure that University policy aligns with Sports Institute NI policy	

No	Issue	Potential Risk	Risk Mitigation	✓
10	Multi-Agency Practice	Failure to report/consult following agencies appropriately:	<p>Locally agreed inter-agency procedures in place</p> <p>e.g; PSNI, DHSSPSNI, Health Care Professionals, Social Services Officers, Education Welfare Officers, NSPCC</p> <p>Child Protection Co-ordinator or other nominee responsible for liaising with public agencies in the event of allegations of abuse being made against University staff</p>	
11	Reporting mechanism	Failure to keep information related to reporting of abuse or concern secure – or failure to report appropriately.	<p>Ensure that safeguarding procedure reflects need for information and awareness of allegation and investigation to be kept to only the University officers (and outside agency officers) who need to know in order to investigate allegation.</p> <p>Disciplinary procedures clear on inappropriate disclosure of information relating to allegations or investigation.</p> <p>Staff knowledgeable about what constitutes abuse and what situations may be of particular concern:</p> <ul style="list-style-type: none"> - categories of sexual, physical, emotional abuse and neglect - definitions of each - indicators of abuse - parental substance abuse and domestic violence, and fabricated/induced illness causes for concern - children may be abusers - children may be involved in prostitution and therefore victims of abuse - unacceptable practices: female genital mutilation, forced marriage (criminal offences) - young carers may need additional support from public services <p>Documentation created during reporting process kept secure and hard copy/electronic copy whereabouts made known to Child Protection Coordinator</p>	

No	Issue	Potential Risk	Risk Mitigation	✓
12	Data Protection	Failure to adhere to the Data Protection Act in record keeping of abuse allegation, investigation and subsequent internal actions.	<p>Safeguarding and Data Protection policies clear on record keeping and disclosure procedures</p> <p>Relevant records officers aware of policies</p> <p>Policies on safeguarding, Data Protection, FOI and Confidentiality align</p> <p>(e.g. keeping records secure, removing a false allegation from a personnel file where required by law)</p>	
13	Criminal Records Checks	Failure to conduct appropriate checks with relevant bodies on relevant lists/databases	Access NI checks may sometimes need to be carried out on students working with younger children	
14	DBS Barred Lists	Failure to conduct appropriate checks with relevant bodies on relevant lists/databases	<p>Appropriate level of criminal record (and related) checks to be carried out.</p> <p>Procedures clear viz. persons previously resident outside of the UK (e.g. in jurisdictions where there are no national child protection registers)</p>	
15	Recruitment	Failure to follow correct procedure during recruitment resulting in appointment to role where NOT working directly with Children / Young Persons / Vulnerable Adults	Appropriate level of criminal record (and related) checks carried out during recruitment process	
16	Transfer / New Role for existing staff	Transfer or Promotion resulting in move to role where working directly with Children / Young Persons / Vulnerable Adults	Appropriate level of criminal record (and related) checks carried out during transfer/promotion consideration process	

No	Issue	Potential Risk	Risk Mitigation	✓
17	Personnel procedures	Failure to implement safeguarding policy in personnel procedures	<p>Recruitment policy to reflect this policy</p> <p>Correct processing of references, previous employment history, DBS Barred List checks, identity, qualifications, health and fitness checks and interview</p> <p>Minutes and records taken accurately</p> <p>Personnel staff aware of duties under this policy</p> <p>Appropriate disciplinary and complaints committees in place</p> <p>Records kept of cases being reported to Secretary of State where there are grounds for believing a person may be unsuitable to work with children</p> <p>Appropriate training of personnel</p> <p>Records of training kept</p>	
18	University Students	Failure to advise students of policy	<p>Communication of this policy to students</p> <p>Liaison and clear line of communication between Students Union and University officers with safeguarding responsibility</p>	
19	Duty of Care to visitors	University fails to meet duty of care to visitors (in respect of safeguarding issues)	<p>Implications of Occupier's Liability Act and law of Tort/Negligence understood by University and reflected in policy.</p> <p>Insurance and indemnities from third parties on University sites obtained where possible</p>	
20	Responsibility to University staff	University fails to meet obligations to employees (in respect of safeguarding issues)	Grievance procedure applied properly where complaint by/against member of University staff	
21	Investigation procedure	Failure to investigate allegation properly (e.g. failure to review/collect all appropriate evidence)	Clear investigations procedure with complies with statutory obligations and government guidance	

No	Issue	Potential Risk	Risk Mitigation	✓
22	Post-allegation procedure (investigation)	Failure of appropriate University officer to take correct next steps following reporting of allegation	<p>Appropriate University officers to deal with safeguarding matters named and known by staff and students</p> <p>Named Child Protection Co-ordinator who liaises with governing bodies, senior management, staff and students to ensure safeguarding policy is being implemented effectively.</p> <p>Sufficient time and resources are available to designated senior person</p> <p>University considers needs of children who may need safeguarding</p> <p>Inter-agency procedures are revised and maintained. Clear understanding of inter-agency working practices.</p>	
23	Post-Investigation procedure	Failure to take appropriate steps following the investigation of the allegation	Personnel and Senior Management to ensure they follow this policy (and if necessary disciplinary procedure) appropriately	
24	University Liaison with Schools	University fails to engage and communicate where appropriate with schools in the province	Appropriate liaison arrangements in place	
25	University Liaison with other children's organisations	University fails to engage and communicate where appropriate with relevant children's organisations in the province	<p>Ensure adequate multi agency arrangements in place</p> <p>Contact lists for other agency up to date</p> <p>Referral procedure complies with legal requirements/obligations</p>	
26	Supervision	Supervision of children by University staff, students (or third parties on University campuses) not undertaken appropriately	Ensure University officers who supervise children comply with best practice	

No	Issue	Potential Risk	Risk Mitigation	✓
27	Images	Photographs of footage of children / young persons released or accessed in breach of legal obligations	Data Protection / Human Rights Act obligations complied with	
28	Children as Research Subjects	Failure to comply with informed consent principles or ethics codes	Clarity as to responsibilities of University research staff, students or volunteers	
29	Monitoring of policy	Effectiveness and implementation of policy not monitored	Clarity as to who oversees and reviews policy, with reference back to Governance Services as appropriate	
30	Revision of policy	Policy becomes outdated (in terms of legislation, government guidance and safeguarding best practices)	Council (or delegated authority) reviews policy annually, provides information to relevant agencies and senior management/Committees about how duties are discharged Child Protection Coordinator and University management remedies any deficiencies or weakness with regard to child protection arrangements that are brought to its attention without delay	

Appendix C: Reporting Pro-Forma

ULSTER UNIVERSITY			
REPORTING PRO-FORMA			
Report completed by:			
Position:		Date:	
Child's Name:			
Child's Address:			
Child's Date of Birth:			
Parent/Carer's Name:			
Parent/Carer's Address:			

Incident date:		Time:	
Your Observations:			
<p>Detail exactly what the child said and what you said:</p> <p>(Remember do not lead the child – record actual details. Continue on separate sheet if necessary)</p>			
Action taken so far:			

Designated officer informed? Yes <input type="checkbox"/> No <input type="checkbox"/>	
External Agencies contacted	
Police Yes <input type="checkbox"/> No <input type="checkbox"/>	Details of advice received:
Branch Contacted:	
Name:	
Contact no:	
Social Services Yes <input type="checkbox"/> No <input type="checkbox"/>	Details of advice received:
Branch Contacted:	
Name:	
Contact no:	
Disclosure and Barring Service Yes <input type="checkbox"/> No <input type="checkbox"/>	Details of advice received:
Name:	
Contact:	
Other (e.g. NSPCC) Yes <input type="checkbox"/> No <input type="checkbox"/>	Details of advice received:
Agency name:	
Name:	
Contact no:	

Signature

Date

Remember to maintain confidentiality on a need to know basis – only if it will protect the child.

Do not discuss the incident with anyone other than those who need to know.

Appendix D: Code of Behaviour

The following **Code of Behaviour** should be followed by all students, employees and volunteers:

Listen to what children have to say.

Avoid being alone with a child where this is practicable.

Hitting, punching or fighting is unacceptable behaviour, as is any form of harm to a child.

Bullying of children, whether physical, verbal or emotional is unacceptable.

Do not use language of a sexual or inappropriate nature in front of children.

Staff and volunteers are advised not to make physical contact with a child except where this is unavoidable due to the nature of the authorised activity, in which case the child must consent to this.

If a child has special needs consider how these can be accommodated (see SENDO and related guidance from the Equality Unit).

Staff, students or volunteers who breach this Code or the Child Protection Policy will be subjected to disciplinary procedures and sanctions.