



## Safeguarding Children and Vulnerable Adults Policy (Version 3.1: 10 November 2015)

### SECTION A: INTRODUCTION AND SCOPE

#### 1.0 Introduction

- 1.1 This policy summarises the University's arrangements to provide a safe environment for children and vulnerable adults. Among other things, these arrangements include: conducting pre-employment/pre-admissions checks; a Code of Practice and Good Conduct; safeguarding risk assessments and a reporting procedure for dealing with any allegation of abuse/harm.
- 1.2 Certain individuals are disqualified from engaging in regulated activity with children and/or vulnerable adults. The University does not allow any such individuals to engage in regulated activity for or on its behalf. Should an individual become disqualified during the course of their employment/work/studies, they shall immediately be removed from regulated activity. Such individuals will also be subject to investigation as per 1.3 below.
- 1.3 In all cases where an individual engages in inappropriate conduct with a child or vulnerable adult the allegations will be investigated under the appropriate University policy/procedure and, where necessary, details will be referred to the relevant statutory organisations. The case may also be notified to the Disclosure and Barring Service who may decide that the individual should be placed on the barred lists.
- 1.4 Responsible Officers from each School/Directorate will ensure that this policy and the accompanying procedural guidelines are fully implemented.

#### 2.0 Scope

- 2.1 The policy applies to all employees, students, and any others who engage in any activity with children and/or vulnerable adults for, or on behalf of, the University. This includes the extended workforce (workers, self-employed contractors, interns, voluntary workers, volunteers and any other unpaid roles). The Policy also applies to external organisations working with children or vulnerable adults on University premises.

### SECTION B: CRIMINAL HISTORY CHECKS

#### 3.0 Registration with AccessNI

- 3.1 AccessNI (ANI) is the organisation responsible for providing criminal history checks.
- 3.2 The designated 'lead Signatory' for the University works within the People and Culture Directorate. The lead signatory is the primary point of contact within the University for ANI and is responsible for managing the process with the assistance of the Child Protection Review Group and senior personnel 'Responsible People' from each

School/Directorate. Counter signatories are members of staff who are registered with AccessNI to request criminal history checks on behalf of the University. Each School/Directorate/Office maintains and regularly reviews the number of counter signatories in place to ensure they can process the required number of checks.

#### 4.0 Checking Prior to Commencement of Work/Studies

4.1 Those who wish to engage in regulated activity are checked as follows:-

a) Enhanced Disclosure Certificates (EDCs) are requested for all United Kingdom or Republic of Ireland (UK/ROI) applicants and for all non-UK/ROI applicants who have resided in the UK for longer than 30 consecutive days in the previous five years.

b) Non-UK/ROI staff/students etc. are required to source a 'Certificate of Good Conduct' (CoGC) from the embassy of their home country.

c) All persons who have resided in any other country for one complete year are required to source a CoGC from the Embassy of the country in which they lived.

4.2 If a criminal history check indicates that an individual is barred from engaging in regulated activity with the relevant workforce, the offer of employment/work or studies will be withdrawn.

4.3 All other information disclosed on an application form, an EDC or a CoGC, which has not resulted in a barring decision, are considered under the University's policy on the Recruitment of Ex Offenders (staff) or the Admission of Applicants with a Criminal Record procedure (student applicants), or any other relevant University policy/procedure. Where no such policy exists the principles of the policies listed are applied.

#### 5.0 Requirement to Advise the University of Changes to Disclosure Information

##### 5.1 Employees and the extended workforce

5.1.1 Candidates holding offers of employment/work/service provision are required to advise the University of any change to the 'unspent conviction' information disclosed on their application form prior to taking up their position.

5.1.2 Post recruitment, all employees are contractually required to advise their Director/Head of School and HR Business Partnering, in writing and without delay, of any change to this information. In addition individuals who engage in regulated activity must also advise their Director/Head of School and HR Business Partnering, in writing and without delay, of any convictions, cautions, informed warnings and diversionary youth conferences, which are not protected, that arise after their criminal history check. They must also advise if they are, or have been, the subject of any criminal investigations or have any prosecutions pending.

5.1.3 Those who are part of the extended workforce (including; workers, self-employed contractors, interns, voluntary workers, volunteers and any other unpaid roles) that carry out regulated activity for the University, must advise the relevant Director/Head of School of any convictions, cautions, informed warnings and diversionary youth conferences which are not protected that have arisen since their criminal history check. They must also advise the relevant Director/Head of School if they are, or have been, the subject of any criminal investigations or have any prosecutions pending.

- 5.1.4 Employees and the extended workforce that engage in regulated activity are required to self-declare any changes to their disclosure information on an annual basis. This exercise is undertaken by the School/Directorate through/for which they engage in regulated activity.
- 5.1.5 All declarations will be considered under the relevant University Policy/Procedure (see Guidelines).
- 5.1.6 Failure to declare any changes to criminal history may result in an investigation under the relevant University Policy

## 5.2 Students

- 5.2.1 Applicants, whose degree programme involves engaging in regulated activity, are required to inform the Head of Admissions and Access Service<sup>1</sup> in writing of any convictions, cautions, informed warnings and diversionary youth conferences, which are not protected. They must also advise if they are, or have been, the subject of any criminal investigations or have any prosecutions pending. The applicant must advise the Head of the Admissions and Access Service of any changes to the information they disclosed, or changes to the information contained on their enhanced check, in writing and without delay, prior to admission to the University. Applicants to all other degree programmes are required to disclose relevant items (please refer to the Admission of Applicants with a Criminal Record Procedure) to the Head of the Admissions and Access Service. If they acquire a relevant item on a criminal record after applying, but before admission to the University, they must advise the Head of Admissions and Access Service of any such changes in writing and without delay.
- 5.2.2 Post admission, students who engage in regulated activity (for the duration of the regulated activity) are required to inform their Head of School and the Director of Academic and Student Affairs in writing, without delay, of any new convictions, cautions, informed warnings and diversionary youth conferences which are not protected that arise after their criminal history check. They must also advise if they are, or have been, the subject of any criminal investigations or have any prosecutions pending which arise after the date of admission and before graduation. Students on all other degree programmes must disclose allegations of criminal activity (as per the Conduct Regulations), that arise after the date of admission to the University and before graduation, to their Head of School and the Director of Academic and Student Affairs in writing, without delay.
- 5.2.3 Students engaging in regulated activity must complete an annual self-declaration form to confirm any changes to their disclosure information. This exercise is undertaken by the School/Directorate through/for which they engage in regulated activity.
- 5.2.4 All declarations will be considered under the relevant University Policy/Procedure (see Guidelines).
- 5.2.5 Failure to declare any changes to criminal history may also result in investigation under the relevant University Policy.

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<sup>1</sup> Or the relevant School contact for Schools that process their own EDC applications.

## **SECTION C: ADDITIONAL PROTECTION MEASURES TO SAFEGUARD CHILDREN AND VULNERABLE ADULTS**

- 6.0 Additional protection measures to safeguard children (including those that make up our student body) and vulnerable adults are outlined below.
- 6.1 The Directorate of Academic and Student Affairs operates a specific policy for supporting members of the University's student body that are under 18. This policy is available from the Head of Student Welfare,
- 6.2 Childcare Services has specific policies in place for the work they carry out with young children.
- 6.3 Childcare Services is registered with Social Services and all staff are SOSKARE checked prior to commencing work with children.
- 6.4 All staff/students/workers are required to comply with the University's 'Code of Conduct and Good Practice for Activity with Children and Vulnerable Adults'. This must be complied with even when the activity does not fall within scope of the definitions of regulated activity.
- 6.5 Training is provided to those responsible for implementing the Policy within their School/Directorate.
- 6.6 Safeguarding risk assessments are completed for all work, activities, events and regulated activity with children/vulnerable adults.
- 6.7 External organisations working with children or vulnerable adults on University premises are required to complete the University's risk assessment prior to the activity commencing. If the organisation does not have the appropriate child protection measures in place it will not be permitted to use Queen's facilities.
- 6.8 The Legal Services Unit conducts audits to ensure legislative and policy compliance across the University.
- 6.9 The University's Child Protection Review Group meets 3-6 times per year to review legislative and policy changes and the internal audit process.

## **SECTION D: DEALING WITH ALLEGATIONS OF RELEVANT CONDUCT, HARM OR ABUSE**

- 7.0 All allegations of inappropriate conduct, harm or abuse are raised with either the Director of Academic and Student Affairs (allegations against students) or the People and Culture Director (allegations against staff).
- 7.1 All allegations are investigated under the relevant University policy/procedure (i.e. disciplinary/conduct/fitness to practice). Referrals may also be made to the appropriate statutory/child protection agencies and to the Disclosure and Barring Service, by the Director of Academic and Student Affairs or by the People and Culture Director for consideration as to whether the individual should be placed on the barred list/s. All referrals will be reported to the Charity Commission as required.

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(Previous versions: June 2008, May 2010 and 23 September 2015)