

SAFEGUARDING POLICY**1. OVERVIEW AND PURPOSE**

- 1.1 The University has a legal and moral duty to ensure that it takes reasonable steps to safeguard the welfare of (i) Children and (ii) Adults at Risk of Harm¹ with whom it engages.
- 1.2 This policy sets out the University's overarching approach and commitments in relation to safeguarding Children and Adults at Risk of Harm. It should be considered in conjunction with relevant safeguarding guidance and procedures, as well as other related University procedures and guidance linked at the end of this policy and, where appropriate, relevant Professional and Statutory Regulatory Body (PSRB) requirements on professional courses.
- 1.3 The aims of this policy are to:
- Prioritise the safeguarding of Children and Adults at Risk of Harm and create a culture in which signs of possible abuse or neglect are recognised and appropriately acted on;
 - Ensure that all staff and students are aware of the specific procedures they should follow to report safeguarding concerns;
 - Ensure that relevant staff are aware of safe recruitment procedures so that all necessary checks are carried out, as well as of requirements for students on courses involving work with Children and/or Adults at Risk of Harm.
 - Promote positive collaborative working within the University and externally with any partnership agencies involved in safeguarding; and
 - Ensure that appropriate action is taken in the event of any allegations or suspicions regarding concerns for Children or Adults at Risk of Harm arising from contact with University staff or students.

2. SCOPE

- 2.1 Safeguarding is the responsibility of everyone in the University community; as such, this policy and associated internal procedures / processes must be adhered to by all staff and students.
- 2.2 For the purposes of this policy, staff includes the following, whether remunerated or not:
- Senior managers, officers, and directors;
 - Employees (whether permanent, fixed-term, temporary, or casual);
 - Contract, seconded, and agency staff;
 - Volunteers, apprentices, and interns; and

¹ Usually abbreviated to 'adults at risk'; please refer to section 4 of this policy for relevant definitions.

- Others associated with (i.e. performing services for or on behalf of) the University (for example, agents and consultants).
- 2.3 The University, as a Higher Education provider, is not subject to the same statutory safeguarding duties as schools, Further Education colleges, local authorities², and care providers. However, as part of creating a safe environment, and in addition to its legal and disclosure and barring obligations, it has a moral responsibility to help safeguard the welfare of Children and Adults at risk by reporting concerns.
- 2.4 Organisations that work in partnership (see definitions in section 4) with the University and / or have a contract with the University, based on or off University-owned property, will have their own legal and safeguarding responsibilities; as such, they are expected to have in place their own safeguarding policies and procedures in relation to activities and individuals for whom they are responsible.

3. **RESPONSIBILITIES**

3.1 **Designated Safeguarding Officer ('DSO')**

- 3.1.1 The University has designated the General Counsel and Director of Governance & Compliance as the University's Designated Safeguarding Officer (DSO). They have ultimate responsibility for the protection of Children and Adults at Risk of Harm when engaging with University-led activity.

3.2 **Senior Safeguarding Officers (SSO)**

- 3.2.1 The University has designated the Director for the Student Experience and the Director of Human Resources as the University's Senior Safeguarding Officers (SSO) for students and staff respectively. They have responsibility for the daily operational issues relating to safeguarding Children and Adults at Risk of Harm.

3.3 **Local Safeguarding Officers (LSO)**

- 3.3.1 The University has designated and trained a number of staff as Local Safeguarding Officers (LSO), i.e. designated individuals to whom concerns must be reported and from whom advice can be sought. A list of contact details for current LSOs is maintained online and linked to in the University's safeguarding guidance. It is not the responsibility of the LSO to investigate a case. It is their role to triage the initial concern and establish whether it is potentially a safeguarding matter and then following the reporting process outlined in this policy.

3.4 **University Safeguarding Panel**

- 3.4.1 The Safeguarding Panel is responsible for overseeing the University-wide compliance framework relating to safeguarding matters to ensure a consistent approach to safeguarding across the University. The role of the Panel is:

² Local authorities have statutory responsibility under the Care Act 2014 for safeguarding adults and under the Children Acts of 1989 and 2004, for Children. They must lead a multi-agency system that seeks to prevent, investigate and intervene in cases of abuse or neglect of Children. The Local Authority (East/West Sussex Councils, Brighton and Hove City Council, collectively referred to as Pan-Sussex where there are shared responsibilities including child safeguarding), Sussex Clinical Commissioning Groups, and Sussex Police collectively hold statutory responsibilities for safeguarding Children in this area.

- a) to oversee and assess the adequacy of the compliance framework in place across the University for safeguarding matters;
- b) to maintain oversight of the University-wide safeguarding arrangements and to ensure such arrangements enable compliance with the University's Safeguarding Policy and relevant legislative and regulatory requirements;
- c) to set safeguarding expectations for third-party partnership arrangements (both academic and commercial partners); and
- d) to maintain oversight of relevant safeguarding related information, guidance and training shared with members of the University.

3.5 Executive Deans of Faculties / Professional Services (PS) Directors

- 3.5.1 It is the responsibility of the relevant Executive Dean or PS Director (except where a partner organisation is primarily responsible) to ensure that an appropriate risk assessment is completed before proceeding with any new or changed programme, event, visit or other activity involving Children or Adults at Risk of Harm, or before admitting or employing a child (under 18 years). This risk assessment is an opportunity not only to mitigate any risk, but to consider alternatives to this course of action/working practice. Executive Deans and PS Directors must have arrangements in place to ensure that, when staff are engaging with Children, parental or legal guardian consent is obtained where required by law, regulation or University policy or procedure.
- 3.5.2 Executive Deans and PS Directors are responsible for ensuring that staff in their area are aware of this policy and their responsibilities, including completion of mandatory University training.

3.6 Human Resources

- 3.6.1 Human Resources colleagues are responsible for ensuring that necessary DBS checks on staff and students are carried out where 'regulated activities', as defined under the Safeguarding Vulnerable Groups Act 2006 (SVGA), are undertaken, and for supporting managers in assessing DBS requirements. More information regarding DBS for managers is available and linked at the end of this policy.
- 3.6.2 Human Resources will determine the level of DBS checks required, the frequency with which they should be performed and ensure that these are kept up-to-date. DBS certificates will be retained on Human Resources files in line with the University's Master Records Retention Schedule.

3.7 All staff & students

- 3.7.1 Staff and students working with Children or Adults at Risk of Harm may require an appropriate Disclosure and Barring Service (DBS)³ check to be undertaken and should

³ The Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 provide for the creation of a referral, vetting and barring scheme through the Disclosure and Barring Service (DBS) – with which the University is registered.

ensure that they are familiar with this policy before commencing any programme, event, visit or activity.

- 3.7.2 Students undertaking a programme of study leading towards professional registration where the professional body requires a DBS check as a pre-condition to entry and practice are required to have this prior to course commencement.
- 3.7.3 All staff and students are responsible for the prompt (no later than within 24 hours of becoming aware) reporting of any safeguarding concerns regarding Children or Adults at Risk of Harm to their line manager or to an LSO, SSO or DSO as appropriate, using the procedure(s) and referral pathway(s) linked at the end of the policy. If a member of staff is unsure of whether a matter should be reported, it is their responsibility to discuss their concerns with their line manager and/or relevant LSO, or contact safeguarding@sussex.ac.uk for advice.
- 3.7.4 All staff are responsible for completing the University's mandatory Safeguarding Essentials Training for all staff and any specialised training dependent on role).

4. POLICY

4.1 Definitions

- 4.1.1 A '**Child**' is a person under the age of 18 years.
- 4.1.2 '**Safeguarding (and promoting the welfare of Children)**' is defined as *'providing help and support to meet the needs of Children as soon as problems emerge; protecting Children from maltreatment, whether that is within or outside the home, including online; preventing impairment of Children's mental and physical health or development; ensuring that Children grow up in circumstances consistent with the provision of safe and effective care; promoting the upbringing of Children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interests of the Children; and taking action to enable all Children to have the best outcomes'*.⁴
- 4.1.3 An '**Adult at Risk (of Harm)**' is a person over 18 years of age and is defined by the Care Act 2014 as having needs for care and support (whether or not a local authority is meeting any of those needs); is experiencing, or is at risk of, abuse or neglect, and, as a result of those needs, is unable to protect himself or herself against the abuse or neglect or the risk of it. There is no definitive list of Adults at Risk of Harm, because risk varies according to situation and each situation must be considered separately. Adults may be considered to be at risk of harm in one situation, but not in another.
- 4.1.4 An Adult at Risk of Harm with care and support needs could include a person with a physical disability, a learning difficulty or a sensory impairment; someone with mental health needs, including dementia or a personality disorder; or a person with a long-term health condition.
- 4.1.5 Adults with care and support needs are not inherently vulnerable, but they may come to be at risk of abuse or neglect at any point due to, for instance, physical or mental ill health, not having support networks, financial circumstances, or being socially isolated.

⁴ As defined in [Working together to safeguard Children - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/Working_together_to_safeguard_children.pdf)

- 4.1.6 In the adult context, safeguarding means protecting an Adult at Risk of Harm's right to live in safety, free from abuse and neglect, as well as promoting their wellbeing and – where appropriate – taking into consideration their views, wishes, feelings, and beliefs before taking any action.⁵
- 4.1.7 **'Prevent/Prevent duty'**: Under the Counter-Terrorism and Security Act 2015, the University is required to have "due regard to the need to prevent people from being drawn into terrorism". Anyone with any related concerns about members of the University community should raise them directly with the University's Designated Prevent Lead (General Counsel and Director of Governance & Compliance) or via email to safeguarding@sussex.ac.uk The Prevent referral pathway for the University is included in the online safeguarding guidance and procedures.
- 4.1.8 A **'partner organisation'** for the purposes of this Policy includes one that has a contract with the University of Sussex to deliver teaching to students or to provide services to the University Community (e.g. International Study Group, Cooperative Childcare nursery), or which is jointly owned or jointly run by the University e.g. Sussex Estates and Facilities, Brighton and Sussex Medical School respectively or is present on University-owned property.

4.2 Safeguarding Principles and Safeguarding / DBS Responsibilities

- 4.2.1 The UK department of Health & Social Care set out six principles of adult safeguarding in its Care Act 2014 guidance, which inform the University's approach:
- Empowerment
 - Prevention
 - Proportionality
 - Protection
 - Partnership
 - Accountability
- 4.2.2 The Sexual Offences Act (2003) makes it a criminal offence for a person to engage in sexual activity of any kind with a person under the age of 18, where the adult is in a position of trust. The University's Relationships Policy (linked at the end of this policy) prohibits any and all intimate relationships with staff or students who are under the age of 18 where the adult is in a position of trust. The onus is on the staff member to comply with this. Anyone suspecting a member of staff in a position of trust of acting inappropriately towards a student or staff member under the age of 18 should report the relationship and should refer to the University's Safeguarding Policy pages and the Comprehensive Single Source of Information.
- 4.2.3 The University has a legal duty to refer individuals to the SSO for staff (upon completion of University internal disciplinary processes) when they are believed to have harmed a Child or an Adult at Risk of Harm, or if they pose a future risk of harm to children or vulnerable adults. No one barred by the DBS can work or volunteer with the vulnerable group or groups from which they are barred.

4.3 Reporting process

⁵ [Care and support statutory guidance - GOV.UK](#)

- 4.3.1 The University has developed internal procedures that must be followed when a safeguarding issue arises. These are linked at the end of this policy and are outlined in the University's Safeguarding online guidance and associated procedures. They include a step-by-step guide on how to respond to safeguarding concerns relating to both staff and students, along with details of safeguarding referral pathways.
- 4.3.2 Where a concern is raised to an LSO, if they determine that it is a potential safeguarding issue (where there is no imminent risk of harm to an individual) this should be reported to the Designated Safeguarding Officer via email: safeguarding@sussex.ac.uk
- 4.3.3 If the LSO considers that a student is at serious risk of harm or there is serious risk of harm to others they should instigate the University's Imminent Risk Protocol. Any welfare concerns which do not fall within the categories above should be directed to the Student Centre via email: StudentCentre@sussex.ac.uk
- 4.3.4 The University is committed to working closely with external services such as Social Services / the Local Authority Designated Safeguarding Officer (LADO), to whom safeguarding issues will be reported through the Pan-Sussex Safeguarding Adults Policy & Procedures. Where possible, the DSO shall be consulted prior to any referral being made to relevant statutory agencies. External referrals shall only be made by the DSO or an SSO, or designated individuals within the Wellbeing Team.
- 4.3.5 Whilst the University must comply with relevant data protection legislation, this should not be a barrier to reporting safeguarding concerns; please refer to the University's Data Protection Policy and related procedures linked at the end of this policy for more information.

5. RELATED LEGISLATION AND GOOD PRACTICE

- 5.1 [Safeguarding Vulnerable Groups Act \(2006\)](#)
- 5.2 [The Protection of Freedoms Act \(2012\)](#)
- 5.3 [Working Together to Safeguard Children 2026](#)
- 5.4 [Safeguarding Policy: Protecting Vulnerable Adults \(2017\)](#)
- 5.5 [The Care Act \(2014\)](#)
- 5.6 [Keeping Children safe in education 2025](#)
- 5.7 [The Health and Safety at Work Act \(1974\)](#)
- 5.8 [The Rehabilitation of Offenders Act \(1974\)](#)
- 5.9 [Sexual Offences \(Amendment\) Act 2000](#)
- 5.10 [The Education Act \(2002\) Section 175](#)
- 5.11 [The Sexual Offences Act \(2003\)](#)
- 5.12 [The Children Act \(1989\); The Children Act \(2004\)](#)
- 5.13 [DBS Code of Practice November \(2015\)](#)
- 5.14 [Counter-Terrorism and Security Act \(2015\)](#)
- 5.15 [Mental Capacity Act 2005](#)
- 5.16 [Sussex Safeguarding Adults Policy and procedures](#)
- 5.17 [Pan Sussex Child Protection and Safeguarding Procedures manual](#)
- 5.18 [Children and Social Work Act \(2017\)](#)
- 5.19 [Domestic Abuse Act 2021 \(legislation.gov.uk\)](#)

Review / Contacts / References

Policy title:	Safeguarding Policy
Date approved:	3 July 2026
Approving body:	Council
Last review date:	July 2026 March 2023
Revision history:	V3: July 2026 V2: March 2023 V1: July 2020
Next review date:	3 July 2029
Related internal policies, procedures, guidance:	University of Sussex Health, Safety and Wellbeing Policy HR - Recruitment guidance Assessing job roles for DBS requirements - guidance for managers Relationships Policy Policy on Definitions of Violence Policy Statement on the use of the Disclosure & Barring Service and the Recruitment of Ex-Offenders Disciplinary Regulations and procedures Data Protection Policy Housing policy on criminal convictions Public Interest Disclosure Policy Dignity, Respect and Inclusion Policy Prevent Duty process Safeguarding Guidance Housing Department: Approach for housing students under 18 years in University residences Sussexsport Child protection & Safeguarding policy Widening Participation Safeguarding Guidance Harassment and sexual misconduct: University of Sussex
Division	General Counsel, Governance and Compliance (GCGC)
Policy owner:	General Counsel and Director of Governance and Compliance
Lead contact / author:	Laila El Baradei, General Counsel, or Louise Spenceley, Governance and Compliance Senior Manager (GCGC)