

Safeguarding Policy & Procedure

Approved by:	Finance Committee	Date:	22 January 2026
Implementation date:	January 2026		
Review date:	January 2027		
Manager responsible:	Chief Executive		

Scope

The Falmouth & Exeter Students' Union's (the Union) safeguarding policy and procedure apply to all aspects of our activity and we have a duty of care to safeguard from harm all vulnerable adults and young people. It will apply to all those involved in the Union, including members, visitors, clients, contractors, consultants, partners, customers and employees.

Introduction

The Union values and encourages the involvement of students in all its services and activities. Occasionally these students, or the work of these students, may include children, young people or vulnerable adults, whose involvement and input to the Union is also encouraged and appreciated. Through its safeguarding policy the Union is committed to promoting the wellbeing and enjoyment of everyone involved, and protecting the health, safety and general welfare of all whilst in the company of the Union staff, elected officers or representatives and volunteers.

The Union aims to treat all students fairly and with equality of opportunity, and as a student's age or vulnerable status will not always be evident the Union extends the best practices for dealing with children, young people or vulnerable adults to all students whilst at the same time acknowledging their independence and autonomy.

Statement of Intent

Children, young people and vulnerable adults may be involved with the Union staff, elected officers or representatives and/or volunteers through a variety of services or activities. In promoting this policy, the Union is keen to take reasonable steps to:

1. provide a friendly, secure and comfortable environment for the benefit and enjoyment of all students and visitors taking into consideration the needs of all concerned and our additional duty of care towards children, young people and vulnerable adults;
2. promote the safety of children, young people and vulnerable adults and any students in contact with the Union; and
3. promote the safety and support of staff, elected officers or representatives and volunteers who have contact with the above.

Definitions

The definitions of 'child', 'young person' and 'vulnerable adult' used in this policy are as follows:

1. A child: is anyone under 18 (or under 16 if in employment) (Criminal Justice and Court Services Act 2000)
2. A young person: is anyone between 14 and 18 (Child & Young Persons Act 1933)

3. A vulnerable adult : is anyone 18 years or older and
 - a. may be in need of community care services by reason of a disability, age or illness and is unable to take care of themselves or is unable to protect themselves from significant harm or exploitation; or
4. ii) is the subject of a regulated activity as defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA 2006). Regulated activity is defined separately for children and adults in the SVGA 2006. Broadly, it may include the following activities:
 - a. provision of healthcare by, or under the supervision of a health care professional;
 - b. provision of relevant personal care (e.g. providing assistance with eating, washing, dressing etc);
 - c. teaching, training and instruction of children;
 - d. care and supervision of children;
 - e. providing assistance in relation to general household matters (e.g. paying bills, doing shopping) which is required by reason for age, illness or disability;
 - f. driving a vehicle for the purpose of transporting a child or vulnerable adult;
5. Abuse can be through inflicting harm or failing to act to prevent harm. Forms of abuse are listed below and abuse may take place in a family, institution or community setting by those known to the individual or by a stranger.
6. Discriminatory abuse includes mistreatment that is racist, sexist, based on a person's disability, and other forms of harassment, slurs or similar treatment.
7. Financial/material abuse includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
8. Physical abuse includes when someone physically hurts or injures another by hitting, shaking, throwing, poisoning, burning, biting or scalding, suffocating, or otherwise causing physical harm. It may be deliberate or reckless and also includes failing to prevent injury.
9. Psychological/emotional abuse includes the persistent emotional ill treatment such as to cause adverse effects on the person's emotional development. It may involve conveying to someone that they are worthless or unloved, inadequate, or valued insofar as they meet needs of another person. It may occur if someone is subjected to constant criticism, name-calling and sarcasm, bullying, racism or unrealistic pressure to perform to high expectations consistently.
10. Sexual abuse includes any sexual act to which an individual has not consented, could not consent or was pressured into consenting. This could include full sexual intercourse, masturbation, oral sex or fondling, showing pornographic books, photographs or videos, or taking pictures for pornographic purposes.
11. Bullying is the deliberate, hurtful behaviour, usually repeated over a period of time where it is difficult for those being bullied to defend themselves. It may be:
 - a. physical, e.g. kicking;
 - b. verbal, e.g. insults and belittling comments;
 - c. emotional, e.g. ignoring and isolating; or
 - d. sexual, e.g. unwanted physical contact.
12. Neglect can be through inflicting harm or failing to act to prevent harm. Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development.

We do not make assumptions about the level of need or support required for all children, young people or vulnerable adults, instead we work with facts, information and relevant stakeholders to ensure the spaces we occupy are safe, open and accessible.

General Principles

The general principles behind this policy are:

1. the fundamental principle, both in law and good practice, is that whenever the interests of a child, young person or vulnerable adult are involved, their welfare must always be paramount; and
2. the Union aims to foster an environment whereby anyone is able to raise any concerns about the safety or wellbeing of any individuals participating in or benefiting from its services and activities and that there will be adequate procedures in place to address these concerns.

Responsibilities

1. Overall responsibility for implementation of this policy lies with the Chief Executive.
2. It is the responsibility of every Line Manager to implement the policy and ensure staff and volunteers in their area are aware of, and comply with this policy.
3. The Chief Executive is responsible for providing adequate provisions for recruitment, selection and ongoing supervision of staff and volunteers that comply with employment law, equality and diversity and selection guidance. Safeguarding and child protection training should be delivered as appropriate, and DBS checks will be required for those who have substantial contact with children, young people and vulnerable adults. DBS checks will not automatically be required for staff, elected officers or representatives or union volunteers coming into contact with young students or those at risk in the course of normal Union activity.
4. The Chief Executive is responsible for all health and safety considerations, including that enhanced duty of care as required for children, young people and vulnerable adults is acknowledged and incorporated into policies and risk assessments for activities and departments.
5. If you have any questions about the content or application of this policy, you should contact the Chief Executive to request training or further information.

Safeguarding procedure and code of conduct

1. Procedure for raising a safeguarding concern

In line with The Union's Safeguarding Policy, all union representatives have a duty to raise any safeguarding concerns with an appropriate contact.

You are not responsible for deciding whether abuse has occurred. That is the task for professional agencies, following referral from a Designated Safeguarding Officer (DSO). Any concerns regarding allegations of abuse must be reported to a DSO in the first instance.

If an individual tells you about abuse or neglect they have suffered you should:

- listen calmly and carefully;
- ask open questions and ensure you understand exactly what they are saying;
- reassure the individual that they have done the right thing by reporting the issue;
- tell the individual what will happen next and to whom you will report their complaint;
- make a note of what the individual said, including the names of any people involved and dates the incidents occurred; and

- immediately report the complaint to a DSO using the Safeguarding Report form.

When taking an individual's complaint you must not:

- ask leading questions or say anything that suggests or prompts a specific answer;
- jump to conclusions;
- promise confidentiality; and
- interrogate the individual.

An accurate and contemporaneous record must be made of what has been alleged, using the exact words of the child or vulnerable adult wherever possible. Any factual observations about the physical or emotional state of the individual sharing their concerns may be included, provided they are relevant and necessary. Records must be kept securely and in accordance with the applicable data protection laws, including the UK GDPR and the Data Protection Act 2018. Access to these records will be strictly limited to those who require it for safeguarding purposes.

This applies in all instances where you have any concern, suspicion or allegation that either a child, young person or a vulnerable adult has been, is being, or is likely to be subjected to harm, abuse or neglect, or is at risk of harming themselves or others.

If you are concerned about the safety or wellbeing of someone (even if you are not sure whether or not there is actually a safeguarding concern), and where there is no imminent risk of danger or harm, then you should contact one of the Union's DSO's as soon as possible. They will talk through the situation with you and decide whether or not it is a safeguarding concern and what action, if any, should be taken.

Responsibilities of the DSO include:

- arranging appropriate safeguarding training for staff;
- ensuring staff recruitment and induction reflect safeguarding best practice;
- receiving complaints and concerns regarding safeguarding and responding accordingly;
- liaising with external agencies regarding safeguarding incidents; and
- maintaining a record of any safeguarding complain or referral.

The DSO's in the Union are:

- Angela Novell, Lead DSO
- Charlie Florey, Head of Communities
- Kayleigh Hardy, Head of Engagement
- Saranna Chipper-Keating, Head of Advocacy

If a safeguarding concern arises outside of normal working hours, please see the contact details page at the end of this procedure. Where you are concerned that there is an imminent risk of danger or harm you should use the appropriate emergency contacts at the end of this procedure.

2. Procedure for handling reports

Upon receiving a report, a DSO should seek to gather enough information regarding the matter in order to make a judgement as to whether there is a safeguarding concern, and if so, whether there may be a duty to report the matter to external services.

In all instances (including those which do not constitute a direct safeguarding concern), the DSO should seek to ascertain whether there may be assistance which could be offered to anyone associated with the situation, in accordance with the Union's general duty of care to students and other users of Union services (for example, signposting to campus or external support services).

DSO's should ensure that a written record of all reports (including a brief summary of the issue and any advice given or action taken) is made using the Safeguarding Report form. Care should be taken to ensure that records are confidential and secure, in accordance with the agreed recording protocols and GDPR requirements.

DSO's should ensure their regular attendance at safeguarding meetings in order to discuss cases and ensure that a consistent approach to safeguarding issues is maintained across the Union.

3. Confidentiality

Definition and scope:

The Union understands confidentiality to mean that sensitive personal information disclosed to a representative of the Union by any student engaging in activities, societies and events and/or using the Union services shall not be given directly or indirectly to any organisation or individual external to the Union, without that students' expressed consent to disclose such information.

We recognise that occasions may arise where representatives of the Union feel they need to breach confidentiality. An example of such an occasion would be if we felt there was a serious risk of harm, either to the student or to others, such as outlined in the safeguarding policy.

Procedure for breaches of confidentiality:

Where a representative of the Union feels that confidentiality should be breached the following steps must be taken:

1. If there is imminent risk:

Where a representative of the Union feels that there is an immediate danger of harm to an individual or to others, they should use the appropriate emergency contact and then immediately contact a DSO. The DSO will follow the procedure in 2-4 below but will do so retrospectively.

If there is no imminent risk

2. The representative should raise the matter immediately with a DSO and discuss with them why they feel confidentiality should be breached. The DSO should take written notes of this discussion.
3. The DSO is responsible for making a decision on whether confidentiality should be breached in the circumstances and should take a written note of this decision.
4. If the DSO decides that confidentiality is to be breached, then they should take the following steps:

1. The DSO should contact the Chief Executive and brief them on the full facts of the case and their decision to breach confidentiality. The Chief Executive can override this decision if they do not feel that the circumstances of the case warrant breaching a student's confidentiality. Both the DSO and the Chief Executive should take written notes of the discussion and decision.
2. The DSO should take detailed notes accurately recording all conversations, decisions and actions taken in relation to the case. These notes should be stored securely and confidentially.

A student is fully entitled to complain about a decision to breach their confidentiality using the Union's Bye-Law 9: Complaints procedure.

Code of Conduct for union representatives

Some actions, no matter how well intentioned, may be misinterpreted and leave all parties at risk. The following is a quick reference guide to appropriate behaviour when working with children, young people and vulnerable adults.

The Union's representatives should:

- be alert to any potential harm or inappropriate behaviour;
- always speak to a DSO if they have concerns about an individual's safety- If there is any imminent risk of harm, either to a person or to others, report the risk to the emergency services (999) first before informing a DSO as soon as possible;
- allow time and space for individuals to raise any concerns, letting the person talk and listening carefully without questioning the truth of what the person is saying;
- try to obtain all the facts and information needed to understand the situation without making any assumptions or judgements about what has happened before starting a formal investigation;
- respect individuals' rights to privacy but never promise to keep something secret- there will be times when confidentiality must be breached in line with this procedure;
- undertake a risk assessment prior to any project, activity or event involving children, young people or vulnerable adults;
- avoid being alone for substantial periods of time with children, young people and vulnerable adults. Where one-to-one work is necessary, they should inform another staff member where they are going, with whom, for how long and why;
- any contact with a child or vulnerable adult takes place in an open environment, avoiding private or unobserved situations;
- be aware that physical contact with a child, young person or adult at risk, however well-intentioned, may be misinterpreted, and should not have physical contact without a person's permission. If the touching is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body. You should maintain a safe and appropriate distance from each person;
- carefully plan and consider sleeping arrangements before any residential activities. Whilst it is recommended that separate accommodation be provided for different genders, consideration must also be given to ensuring that an inclusive environment is provided for all and that the needs and preferences of any transgender and non-binary participants are met;
- ensure that the language you use is appropriate, clear and cannot be misinterpreted. Avoid jokes or comments that could be construed as offensive or sexual;

- be aware that ‘abuse of a position of trust’ is a serious issue and ensure that they do not take advantage of any power imbalance arising from their position as a member of staff, elected officer, trustee, representative or union volunteer;
- never show favouritism to or become too closely associated with any individuals participating in or benefiting from the Union’s services and activities;
- never permit abusive behaviour by others or engage in it themselves (e.g. ridiculing, bullying and harassing) or allow or engage in suggestive remarks, gestures or touching of a kind that could be misunderstood;
- ensure that all contact with any individuals participating in or benefiting from the Union’s services and activities is conducted in an appropriate setting and only use official Union or individual work email or social media channels- never use personal accounts; and
- adhere to the safeguarding policies and procedures of any external organisations they are working with.

Record-keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Fair Processing Notice (Employee Data).

Contact Details

Lead Designated Safeguarding Officer (LDSO)

Name: Angela Novell, Chief Executive

Email: angela.novell@thesu.org.uk

Designated Safeguarding Officers (DSO)

Name: Charlie Florey, Head of Communities

Email: charlie.florey@thesu.org.uk

Name: Kayleigh Hardy, Head of Engagement

Email: k.hardy@thesu.org.uk

Name: Saranna Chipper-Keating, Head of Advocacy

Email: Saranna.chipperkeating@thesu.org.uk

Out of Hours Support

If you require urgent out of hours support, please read the following information:

Situation	Contact
You or anyone else around you is at immediate risk of harm	999
You need immediate medical attention	999
You need medical advice and do not require paramedics	111
You wish to report a crime	101 (remember 999 if the crime is occurring there and then or if it is an emergency)
You have an urgent/ immediate concern and need immediate advice from Campus staff	Safety & Support Team 24/7- 01326 255874 or Student Services – 01326 370460
You would like to speak to a Mental Health professional urgently as a result of your own mental health or that of someone else, anytime of day or night.	NHS Mental Health Professional 0800 038 5300
Crisis Support Contracts	Samaritans Call 116 123 or email jo@samaritans.org if you need someone to talk to, who won't judge or tell you what to do. Papyrus Hopeline247 Call 0800 068 4141, text 07860039967, email pat@papyrus-uk.org if you are not coping with life and would like confidential suicide prevention advice. Shout Text 85258 for free and confidential text support when you are dealing with suicidal thoughts and need support getting to a calmer place.