THE UNIVERSITY OF LEEDS

GUIDANCE ON ORGANISING ACTIVITIES FOR CHILDREN OR ADULTS IN VULNERABLE CIRCUMSTANCES

Introduction and Executive Summary

This procedural Guidance is referred to in the University Policy on Safeguarding children, young persons and adults in vulnerable circumstances http://www.leeds.ac.uk/secretariat/documents/safeguarding_policy.pdf. The Guidance seeks to assist all staff engaged in organised activities for children, young persons or adults in vulnerable circumstances who are not members of the University. It is intended to be overarching so that all Staff participating in Activities with Protected Persons (see paragraph 4.1 below) know what principles and procedures should be followed when doing so.

Under English law, a person under 18 is regarded as a child. Whilst there is no specific statutory duty on a HEI to safeguard children, the common law duty of care is enhanced as a result of the age of the Protected Person.

This Guidance does <u>not</u> apply to (a) the process for assessing applicants under 18 for admission onto an academic programme of study or (b) after admission, the ongoing academic activities of the student in the relevant Schools of the University which are subject to the Guidance on the Admission of Young Persons and Children.

Some Schools/Services may have procedures and guidance specifically tailored to their requirements as a result of specific relationships with children and adults in vulnerable circumstances by virtue of level or frequency of provision of service to such a group and/or areas where external professional bodies require specific procedures to be in place in respect of teaching and learning and/or research. Examples include Bright Beginnings Nursery, The Edge Sports Centre, School of Healthcare, School of Medicine, School of Education, Disabled Students' Assessment and Support, Educational Engagement.

Where local policies and procedures have been approved by Heads of School/Service, this Guidance is intended to complement rather than replace those. This Guidance sets out the minimum requirements for safeguarding. Heads of School/Services should satisfy themselves that the local procedures adhere to and do not contradict the principles of safeguarding set out in the University Policy on

Safeguarding Children, Young Persons and Adults in Vulnerable Circumstances and Guidance under the Policy.

Effective safeguarding practice starts with having in place effective procedures. Lines of responsibility must be clear, with leadership from the highest level. Representatives from across the University should be involved in implementation and in contributing to a culture in which safeguarding is taken seriously. The Guidance sets out whose responsibility it is to implement processes to meet the duties owed. Staff with particular responsibilities will need appropriate training and all staff will need to be aware of the University's Policies and Guidance.

The first part of the Guidance sets out relevant legislation and guidance; the purpose of the Guidance; responsibilities under it and useful definitions relating to the persons to whom and circumstances to which it will apply, to enable an understanding of the necessity to adopt and follow the procedures set out within it.

It then establishes the processes which should be followed prior to undertaking and during provision of an Activity involving Protected Persons and whose responsibility it is to implement those processes.

Finally, it provides guidance on procedures to be followed in the event of a safeguarding incident including how that should be responded to and reported, together with details of individuals from whom further advice and information can be obtained, and associated University policies which may be applicable.

The Guidance is supplemented by more detailed and specific advice aimed at staff with particular roles in relation to under 18s, contained at appendices 1-4. Appendix 1 provides more detailed definitions together with guidance on staffing, behaviour around Protected Persons, abuse, involvement of external organisations, the Disclosure and Barring Service (DBS) and the roles of the persons predominantly responsible for safeguarding.

Appendix 2 contains forms which can be utilised in certain circumstances; appendix 3 sets out examples of Activities and appendix 4 contains guidance in relation to completion of the health and safety risk assessment process.

Appendices 5 and 6 provide guidance in the event of a safeguarding incident occurring.

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http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_3.pdf

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http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_4.pdf

Appendix 5 – Chain of reporting allegations/disclosures of abuse

http://www.leeds.ac.uk/secretariat/documents/safeguarding appendix 5.pdf

Appendix 6 – Procedure for reporting allegations/disclosures of abuse

http://www.leeds.ac.uk/secretariat/documents/safeguarding appendix 6.pdf

1. Relevant Legislation and Guidance

- 1.1. Higher Education Institutions (HEIs) owe a duty of care under the Common Law and Statute including the Health and Safety at Work Act 1974, Data Protection Act 1998, Equality Act 2010 and the Occupier's Liability Act 1957 towards persons with whom it has contact. In respect of Children, Young Persons and Adults in Vulnerable Circumstances, such duties are often enhanced. Safeguarding those groups involves putting arrangements in place to take all reasonable measures to ensure that risks of harm are minimised.
 - 1.1.1. The principal legislation relating to safeguarding is the Safeguarding Vulnerable Groups Act 2006 (SVGA) as amended by the Protection of Freedoms Act 2012 (PFA).
 - 1.1.2. Under the Sexual Offences Act 2003, it is a criminal offence for any person in a position of trust (which will include a teacher, student mentor, academic and other members of staff) to engage in sexual activity with a person under 18, irrespective of apparent consent.
- **1.2.** There is no legislation specifically directed towards HEIs in relation to safeguarding. Sector guidance¹ has been archived by BIS.
- 1.3. This Guidance defines the University's duties in accordance with the law and its commitments under the Policy to protect and safeguard vulnerable groups coming into contact with the University.
- 1.4. Detailed advice on definitions and on implementation of this Guidance in relation to Staffing; Behaviour around Protected Persons; Abuse; Involvement of External Organisations; the DBS and Roles of those with specific safeguarding responsibilities is at Appendix 1.
- 1.5. It is understood that BIS are currently considering the position of HEIs in relation to safeguarding and several changes are anticipated. This Guidance will be updated as and when such changes are notified to the University.

CEC/Child Protection/Guidance on organising activities v30 Clean 16 June 2016

¹ Safeguarding Children: Guidance for English HEIs issued by the Department for Innovation, Universities and Skills (DIUS Guidance)

2. Purpose

- 2.1. The University's commitment to promoting good practice in relation to safeguarding requires procedures to be put in place, responsibilities to be clear and leadership to come from the highest level. All members of staff have a responsibility for safeguarding. They must be made aware of relevant policies and procedures and will be expected to observe guidance set out therein. Members of staff with particular responsibilities for safeguarding by virtue of their role will be provided with training. Heads of Schools/Services have a duty to ensure all members of staff are made aware of this Guidance, including through the induction process for new members of staff and to ensure that adequate training is made available to members of staff undertaking Regulated Activity and/or roles involving significant contact with Protected Persons (see Section 5 of Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]).
- **2.2.** Procedures must be in place in respect of all Activities to ensure that:
 - 2.2.1. The welfare of the Protected Person is paramount.
 - 2.2.2. The safeguarding and health and safety culture of the University is upheld.
 - 2.2.3. Staff feel confident and able to participate in Activities involving Protected Persons.
 - 2.2.4. all Protected Persons have the opportunity to participate in Activities in a safe and secure environment.
 - 2.2.5. parents/carers have full confidence in the University.
 - 2.2.6. unsuitable persons are prevented from working with Protected Persons.
 - 2.2.7. staff do not put themselves in a position where an allegation of abuse can be made against them.

- 2.2.8. any Protected Person who is harmed, is identified and responded to appropriately and quickly.
- 2.2.9. signs of abuse are recognised² and addressed.
- 2.2.10. any disclosures of abuse are dealt with appropriately and quickly.
- 2.2.11.the duties to refer individuals to the Disclosure and Barring Service (DBS) for consideration for barring in relevant circumstances, and to provide information to DBS upon request, are met.
- 2.3. The cornerstones of safeguarding are Risk Assessment (see paragraph 5 below), Recruitment and Training (see paragraphs 6 & 7 below), Responsibility (see paragraph 3 below) and Dealing with Abuse (see paragraph 8 below). This Guidance aims to facilitate Activities by providing procedures and advice to be followed which aim to support those cornerstones in order to protect and safeguard the welfare of vulnerable groups.

3. Responsibilities

- 3.1. The Designated Senior Officer (DSO) with responsibility for safeguarding Protected Persons is Jennifer Sewel, the University Secretary (see paragraph 10 below). The role of the DSO is set out in Section 6 of the Guidance Notes at Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].
- 3.2. The DSO will be supported in his role by a University Safeguarding Officer (USO) (see paragraph 10 below) together with a network of Support Officers (SO) as detailed at paragraph 10 below. Their respective roles are set out at Section 6 of the Guidance Notes at Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].
- 3.3. It is the responsibility of Faculty Deans and Heads of Schools/Services to ensure that staff are aware of this Guidance. Heads of Schools/Services must ensure that measures described below are put in place and specifically

² The NSPCC guidance on definitions and signs of child abuse is at https://www.nspcc.org.uk/search/?query=definitions%20and%20signs%20of%20abuse%202014

that every Activity has an Organiser with delegated responsibility in accordance with paragraph 4.3 below. It is not acceptable for any part of the University to exclude or not engage with any Protected Person because they feel unable or unwilling to follow the processes set out below. Staff are expected to fully comply with the procedures and guidance.

3.4. Each Head of Service/Faculty/School should consider the need for a Designated Safeguarding Person to lead the implementation of safeguarding principles in their area and to whom concerns relating to allegations and disclosures of abuse should be expressed. Level of frequency of provision of service or contact with Protected Persons will vary and the need for a Designated Safeguarding Person should be considered in the light of that. Advice is available from the SOs at paragraph 10 below and appropriate training would be required.

4. Definitions

4.1. Protected Persons

4.1.1. For the purposes of this Guidance, a **child** is any person under the age of 18 years. It is recognised that the younger the child, generally, the greater the risk. Such factor should be taken into account in the risk assessment process. An **adult in vulnerable circumstances** is defined by reference to the activity being carried out (see paragraph 5.10.2.6 of Appendix 1). The term "**Protected Persons**", will be used as a generic term to describe either of the above defined categories.

4.2. Activities

4.2.1. Activities include (but are not limited to) the list at Appendix 3 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_3.pdf]. Examples are summer schools, taster days, recruitment events, widening participation events, student volunteering, Outreach projects etc. All Activities should be undertaken as an "Event with Children or Vulnerable Adults" (a major event) in accordance with the University Risk Management of Events Protocol ("The Events Protocol").

http://www.leeds.ac.uk/safety/events/events_intro.htm or in accordance with an applicable School/Service procedure, as specifically indicated in Appendix

3. Guidance in respect of individual Responsibilities and Risk Assessments is

set out in the Events Protocol. This Guidance operates in conjunction with the Events Protocol or applicable School/Service procedures where the Event involves Activities with Protected Persons.

4.3. Organiser of the Activity

4.3.1. For the purposes of this Guidance, the **Organiser of the Activity** is the person designated by the Head of School/Service for the organisation and delivery of the Activity in accordance with the Events Protocol http://www.leeds.ac.uk/safety/events/event organiser.htm.

4.4. Countersignatory

4.4.1. A countersignatory is a member of staff who is registered with the DBS to countersign criminal record check applications and to view/check the Disclosure on behalf of the University of Leeds.

5. Risk Assessments

- 5.1. The person responsible for organising the Activity ("Organiser of the Activity") must complete a risk assessment ("Risk Assessment") in accordance with the responsibilities of an "Event Organiser" set out in the University Events Protocol (http://www.leeds.ac.uk/safety/events/event_organiser.htm.) or other guidance specific to the School/Service organising an Activity in List B of Appendix 3, prior to each Activity to be organised involving a Protected Person. Guidance in Appendix 1 (Safeguarding) [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf] and Appendix 4 (Health & Safety) [http://www.leeds.ac.uk/secretariat/documents/safeguarding appendix 4.pdf], should be followed as part of the Risk Assessment process. The Dean/Head of Service Group must approve the Activity together with the Risk Assessment and ensure that appropriate persons have delegated authority. In all cases, the Risk Assessment process must be completed and satisfactory control measures put in place before any Activity involving a Protected Person is undertaken.
- **5.2.** The purpose of the Risk Assessment is to identify what, in the proposed Activity, could cause harm to the Protected Person in order to assess whether

enough precautions have been taken or whether more should be done to prevent harm. In addition to the risks posed by the Activity itself, consideration should be given to appropriate staffing in accordance with paragraph 6 below and the Guidance Notes at Appendix 1

[http://www.leeds.ac.uk/secretariat/documents/safequarding_appendix_1.pdf].

- **5.3.** There are two distinct elements to risk assessing Activities involving Protected Persons which are a) Safeguarding and b) Health and Safety. There is a clear demarcation between the two elements but both are important.
- **5.4.** Safeguarding and health and safety:-
 - 5.4.1. Safeguarding:
 - 5.4.1.1. Safeguarding involves caring for vulnerable groups appropriately and protecting them from harm.
 - 5.4.1.2. Reference should be made to the Guidance notes at Appendix 1 with particular emphasis on staffing considerations in paragraph 1

 [http://www.leeds.ac.uk/secretariat/documents/safeguar ding_appendix_1.pdf].
 - 5.4.1.3. Where appropriate, Codes of Conduct as set out in Forms
 A and B of Appendix 2

 [http://www.leeds.ac.uk/secretariat/documents/safeguardin
 g_appendix_2.pdf] should be agreed with the Protected
 Person (via, if applicable, a group leader in the case of a
 school etc) and any External Organisations respectively,
 detailing expectations of behaviour on the part of each
 party.
 - 5.4.1.4. Under the Data Protection Act 2008, an image of a Child is personal data where the Child is identifiable. Written consent must be obtained before the images are created, in the form set out within Appendix 2 Form A [http://www.leeds.ac.uk/secretariat/documents/safeguardin g_appendix_2.pdf] (or other form approved within the University Policy on Data Protection

http://www.leeds.ac.uk/secretariat/data_protection_code_o f_practice.html). Whenever an image of a child is to be published (even with consent), the data subject should generally not be identified further through for example details of their name being provided.

- 5.4.2. Health and Safety (see Appendix 4

 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_4.pdf]):
 - 5.4.2.1. Reference should be made to the Guidance on completing a Risk Assessment with particular consideration being given to the advance provision of information, orientation and induction, and application of emergency procedures e.g. accident, fire and evacuation.
 - 5.4.2.2. The Risk Assessment should take into account the specific risks arising from the age of the participant, eg lack of experience and knowledge, perception of risk and the needs of the individual.

5.5. Accommodation

- 5.5.1. In respect of Activities involving a residential element on campus, the Protected Person will be accommodated in suitable accommodation to be identified by the Organiser of the Activity, in conjunction with Residences (see paragraph 10.3.6 below for Accommodation contact).
- 5.5.2. Wardens, sub-wardens, night porters and hall managers of accommodation occupied by Protected Persons are to be criminal record checked and trained. Cleaners should not enter rooms occupied by Protected Persons whilst the Protected Person is alone.
- 5.5.3. A Risk Assessment covering accommodation will be carried out by the Organiser of the Activity in conjunction with Residences.

6. Staffing

6.1. Recruitment and Selection

- 6.1.1. For the purposes of this Guidance the term Staff will include volunteers, (including student volunteers), Students undertaking activities in accordance with their programmes of study and members of external organisations (see guidance at 4.1 of Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]) conducting Activities on behalf of the University. All staff must be appropriately recruited, trained and managed.
- 6.1.2. Where a member of staff is responsible for recruiting a member of staff or assigning an existing member of staff to carry out a role which may involve Regulated Activity and/or significant contact (see guidance at Section 5 of Appendix 1

 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]) with Protected Persons, that member of staff must consider and Risk Assess the role in accordance with procedures set out below, to determine the prospective suitability of the individual to undertake that role. Advice should be sought from the relevant countersignatory/disclosure manager in order to determine applicability of 'Regulated Activity' or 'significant contact' to ensure the legal entitlement for and submission of a check are at the correct level and type.
- 6.1.3. Only trained and registered countersignatories/disclosure managers are authorised to carry out criminal record checks on behalf of the University.
- 6.1.4. Safe, careful recruitment is essential and all sensible steps must be taken to identify the right person for the role including notification that the post falls under the remit of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and requires a barred list check and/or Enhanced/Standard Disclosure from the DBS. All reasonable steps must be taken to verify identity; carry out relevant reference checks, foreign checks as applicable, look carefully at career gaps and conduct face to face interviews. Any issue raised must be fully addressed.

- 6.1.5. Staff employed in such posts have an ongoing duty to disclose any convictions, cautions, reprimands and warnings as soon as they are imposed, including pending criminal proceedings (save for motoring offences unless a custodial sentence is imposed or the role requires driving) during the course of their employment.
- 6.1.6. The University Policy statement on candidates for employment and existing staff with criminal records is at:
 http://hr.leeds.ac.uk/info/33/recruitment_and_redeployment/13/criminal_records
- 6.1.7. New staff will receive a copy of this Guidance as part of the induction process.
- 6.1.8. DBS guidance on recruitment and checking is included at Appendix 1, section[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].

6.2. When is a criminal record check necessary?

- 6.2.1. The DBS Countersignatory/disclosure manager for the relevant School/Service will provide advice regarding the requirement for a check and the appropriate level and type. Details of the University Lead Countersignatory/disclosure manager are set out below at paragraph 10.3.7. It should, however, be remembered that formal checks are only a part of safeguarding and good practice should be observed, as set out in Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].
- 6.2.2. Extensive guidance on DBS checking is at Section 5 of Appendix 1

 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].

6.3. Staff conduct during the Activity

6.3.1. The Guidance Notes at Appendix 1, Sections 2, 3 and 4

[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]

will be relevant to all Activities involving Protected Persons.

7. Training

- 7.1. Training and support on Policy requirements and good practice will be provided for all University of Leeds Staff to be engaged in Regulated Activity, to those whose roles involve significant contact with Protected Persons and to staff involved in facilitating appointments and checking of such staff. Training needs are likely to be informed by the results of the risk assessment and the nature of the contact with Protected Persons specific to their role. Staff are expected to participate in training available, as assessed appropriate to the role being carried out.
- 7.2. Approval for taking on the role of countersignatory/disclosure manager is required from the appropriate Head of Department/Service and guidance about the process to become a DBS countersignatory/disclosure manager for the University can be obtained from Liz Felgate, University Lead Countersignatory/disclosure manager (see 10 below). Information about the requirements and responsibilities of this role is given to countersignatories/disclosure managers before they start to check and sign off criminal record applications, and annually, they may be asked to attend training and information sessions for countersignatories/disclosure managers. They are also expected to keep themselves up to date with change and development through the DBS monthly news and information in the links at Section 5 of Appendix 1

[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]. DBS countersignatories/disclosure managers are responsible for training and keeping up to date, all staff who support them with this process.

- **7.3.** Other members of staff having any contact with Protected Persons must have a general awareness of the Policy and Guidance and be aware of who to contact in the event of any concerns.
- 8. Responding to allegations and disclosures of abuse
- 8.1. All Staff must be aware of the possibility that Protected Persons may be at risk of abuse² either within or outside the University. Whilst it is not the responsibility of any member of Staff working with a Protected Person to investigate and decide whether abuse has taken place, it is the responsibility of all Staff to act on concerns regarding abuse to safeguard their welfare. Detailed guidance on recognising and acting upon suspicions of abuse is at Section 3 of Appendix 1

[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf]. All incidents or allegations of abuse must be reported immediately, as detailed in Section 3 of Appendix 1

[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf] and will be taken seriously and dealt with quickly and appropriately in accordance with the guidance.

- 8.2. Any allegation made against a member of staff must be reported immediately and directly to the Designated Senior Officer (DSO) (see paragraph 10) and be handled fairly, quickly and consistently to provide effective protection for the Protected Person making the allegation and support for the person who is the subject of the allegation. Staff against whom allegations have been made should seek the advice of their HR Manager, Union or professional association. The procedure to be followed is included in the Guidance Notes at Section 3 of Appendix 1
 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf].
- 8.3. Where it is suspected that a Protected Person may have suffered abuse which is unconnected with the University, advice should be sought in accordance with paragraph 10 below and the procedure set out in the Guidance Notes at Section 3 of Appendix 1
 [http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_1.pdf] followed for submission of a report to the DSO.

8.4. Prevent

8.4.1. Where there is reason to believe that a Protected Person may be at risk of being drawn into terrorism, advice should be taken from the University Deputy Secretary, David Wardle.

9. Referrals to the Disclosure and Barring Service (DBS)

9.1. The University has a duty to make appropriate referrals to the DBS (formerly the Independent Safeguarding Authority (ISA)). If a person is dismissed or removed from Regulated Activity (or would have been if they had not already left) because they harmed or posed risk to Protected Persons, there is a legal duty to inform DBS and not to do so is a criminal offence. It is an offence to knowingly allow a barred person to work in Regulated Activity. Referrals will

be made in accordance with the guidance set out at 6.1.11 of Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding appendix 1.pdf]. Staff have a duty to report any such incident in accordance with the guidance set out at paragraph 3 of the guidance at Appendix 1 [http://www.leeds.ac.uk/secretariat/documents/safeguarding appendix 1.pdf].

10. Further information and advice

- 10.1. The University Designated Senior Officer (DSO) is the University Secretary, Jennifer Sewel:
 email <u>University-Secretary@leeds.ac.uk</u>, telephone 343 4011.
- 10.2. The University Safeguarding Officer (USO) is Iain Moody, School of Healthcare: email i.j.moody@leeds.ac.uk, telephone 343 9418
- **10.3.** Further information and advice can be obtained from Support Officers on the following areas:
 - 10.3.1. Policy Framework: Caroline Coulsey email c.e.coulsey@adm.leeds.ac.uk, telephone number 343 3942, or Adrian Slater email a.j.slater@adm.leeds.ac.uk, telephone number 343 4078, of the University's Legal Adviser's Office.
 - 10.3.2. Health and Safety Risk Assessment: Paul Veevers of Health and Safety Services, email p.veevers@leeds.ac.uk, telephone number 343 2407.
 - 10.3.3. Responding to Allegations against members of Staff and referrals to the DBS: Linda Mortimer Pine of Human Resources, email <u>l.mortimer-pine@adm.leeds.ac.uk</u>, telephone number 343 4912.
 - 10.3.4. Responding the Allegations concerning persons other than members of Staff and referrals to Social Services: Iain Moody, email i.j.moody@leeds.ac.uk, telephone number 343 9418.

- 10.3.5. Staffing: Linda Mortimer Pine (as above).
- 10.3.6. Accommodation: Ian Robertson of Residences, email i.w.robertson@adm.leeds.ac.uk, telephone number 343 6366.
- 10.3.7. DBS/criminal records: Liz Felgate (University Lead Countersignatory/disclosure manager) of Human resources, email e.i.felgate@adm.leeds.ac.uk, telephone number 343 4149
- 10.3.8. General: Caroline Coulsey or Adrian Slater (as above)
- **10.4.** Should an emergency situation arise outside normal office hours, the above persons may be contacted via Security Services on 343 5494.

11. Related University Policies

11.1. The University Events Protocol

http://www.leeds.ac.uk/safety/events/events_intro.htm should be followed in relation to any Activity involving Protected Persons, as applicable (see Appendix 3

[http://www.leeds.ac.uk/secretariat/documents/safeguarding_appendix_3.pdf]).

- **11.2.** Other relevant policies include:

 - 11.2.2. Anti-bullying http://www.equality.leeds.ac.uk/DMR/DMR-policy.htm
 - 11.2.3. Whistleblowing –

 http://hr.leeds.ac.uk/info/26/conduct_capability_and_grievance/12/whistle_blowing
- 11.3. Concerns regarding the above may also be raised with the relevant HR Manager. The University of Leeds treats all forms of abuse, bullying, intimidation, sexist and racist behaviour very seriously.

12. Review

12.1.	Review of this Guidance should take place every 12 months by the Legal Adviser's Office.