Safeguarding Policy

In effect from the beginning of the Academic Year 2026/27.



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1 Introduction, purpose and scope

1.1 De Montfort University Kazakhstan (DMUK) is proud of its commitment to the public good and therefore supports the principle that 'safeguarding is everyone's business' and is committed to supporting staff to 'do the right thing' when they have concerns.

1.2 The policy will be promoted through the university website, staff training and communications as determined by the safeguarding committee, which includes the Academic Director, Head of Student Development Services, Head of HR and Head of Facilities (Appendix 1). It is also expected that the commitment to implementing the policy will be maintained, and DMUK senior management team members should ensure that safeguarding issues remain at the forefront of their discussions with staff.

1.3 The policy applies to students from all forms of study in the DMUK, including undergraduate, postgraduate students and staff.

1.4 In relation to trainees and interns, it is important to remember that it is also important to consider what happens in the employment context.

1.5 The policy reflects the fact that DMUK has many students with care and support needs who may be vulnerable to abuse and harm, and provides some services and courses for under-18s.

1.6 To help DMUK become a safe, healthy university that promotes wellbeing and protects adults and children who may be at risk of harm or abuse.

1.7 To make staff aware of our responsibilities to safeguard adults and children who come to all university-related events, both on and off campus.

1.8 To help staff understand the role they can play in safeguarding, recognising risks to adults and children, including when we receive information that indicates risks in the wider community, and knowing what action to take.

1.9 To enhance DMUK's ability to be socially responsible and support students who would otherwise find it difficult to continue their studies.

1.10 To demonstrate our broad commitment to raising awareness of what can lead to adults

and children becoming vulnerable to abuse and harm, preventing harm and creating a safe environment.

2 Fundamental Principles

2.1 Reflect the law and principles of good practice in statutory guidance relating to safeguarding.

2.2 The policy will have clear links to local multi-agency policies and procedures and relevant DMUK policies.

2.3 Ensuring that approaches to security in the DMUK are consistent with those adopted by statutory agencies.

2.4 Identifying the individuals within the DMUK management structure who are responsible for security and establishing their roles and responsibilities.

2.5 Require staff to complete DMU Leicester's e-learning course on safeguarding.

2.6 Provide good quality advice and information on support and services to help protect adults and children from abuse and harm, or respond to identified needs. This includes specialised safeguarding interventions, general support and targeted support to help reduce vulnerability and safeguarding incidents.

2.7 Identify a senior manager at a level to take leadership responsibility and chair the safeguarding committee to oversee safeguarding arrangements in the organisation.

2.8 Promote a culture of listening to children and adults and taking account of their wishes and feelings.

3 Definition of safeguarding

3.1 Safeguarding is the protection of children and adults who may be vulnerable from all forms of abuse or exploitation.

3.2 There is no exhaustive list of what may constitute abuse or exploitation, but it includes physical, emotional, sexual, financial abuse, neglect, internet abuse, domestic abuse, trafficking and discriminatory abuse.

3.3 Safeguarding also refers to the wider preventative duties that relate to the welfare and well-being of children, enabling people to reach their full potential, as well as maintaining safety and health.

4 Safeguarding children

4.1 Child protection duties apply to anyone who is not yet under 18 years of age. The fact that a child lives independently or is in further or higher education does not change his or her right to protection.

4.2 However, we are still obliged to act on concerns about children, regardless of whether the child himself or herself chooses to do so.

4.3 In some cases, information about children comes from an adult who is reluctant to take action. In child protection, the needs of the child are paramount, and the needs and wishes of every child, whether infant or older, must always be put first.

4.4 DMUK will not allow student relationship issues to override our obligations to report child protection concerns, and individual members of staff will be expected to provide any such information the same day it is received to ensure swift action is taken.

5 Safeguarding Adults

5.1 Safeguarding duties apply to adults who are or may be in need of community services due to age, illness, or mental or physical disability. Who are or may be unable to look after themselves or protect themselves from significant harm or exploitation.

5.2 Adults must be assumed to have the capacity to make their own decisions, and all possible help must be given before anyone is assumed to be incapable of making their own decisions, even in situations where their actions may appear unreasonable.

5.3 If an adult is found to be incapable of making decisions, any action or decision taken for or on their behalf should be done in their best interests.

5.4 The adult may not want to take action. If the adult has the mental capacity to make informed decisions about their safety and they do not want to take action, you should still

share the information you have with the Safeguarding Coordinator.

6 Situations of concern

6.1 Witnessing something that constitutes harm or neglect.

6.2 You have become aware of abuse or neglect. In some cases, the disclosure may relate to something that happened a long time ago (often called historical abuse) but is still significant and important for the person to address.

6.3 In cases where the disclosure relates to historical abuse, it is important to recognise that the abuser may continue to abuse children or vulnerable adults in the present day, in which case action needs to be taken.

6.4 You may suspect that abuse or neglect is taking place. It is important to be vigilant and be sensitive to the warning signs of abuse.

7 Early warning signs of possible abuse or neglect

7.1 There is no exhaustive list of what may indicate abuse, and more information on the warning signs of abuse can be found in the DMU Safeguarding Essentials e-learning toolkit.

7.2 Emotional abuse may be indicated by unusual behaviour, developmental delay, lack of self-esteem, and unprecedented outbursts of violence.

7.3 Neglect may be indicated by persistent hunger, weight loss, constant fatigue, inappropriate or uncharacteristic clothing, isolation/inability to communicate.

7.4 Physical abuse may be indicated by unexplained bruising, burns, broken bones etc., fear of parents/carers/other people, flinching when approached or hiding injuries.

7.5 Sexual abuse may be indicated by sexually transmitted infections, fear of being alone with the abuser, sexual knowledge far beyond developmental level, or inappropriate sexualised/risky behaviour

7.6 Financial abuse may be indicated by difficulty buying everyday items, lack of resources,

borrowing money regularly, or old/inadequate clothing.

8 Recognising emergencies

8.1 If there are reasonable grounds to believe that a person is in immediate danger, consideration should be given to contacting the police on 102 and, if necessary, the emergency medical service 103.

8.2 The Safeguarding Coordinator should be informed of the situation as soon as possible following such urgent action.

8.3 The decision as to whether a situation is an emergency or urgent situation will, in practice, always depend on the circumstances of the situation, but a person who expresses concerns for their immediate safety, is afraid to go home, seems desperate to find help, has any physical injuries or evidence of immediate suicidal intentions should consider contacting the emergency services.

9 Non-emergency situations

9.1 At the first sign of concern, your task is to listen, gather and record information. At this stage, you should not unilaterally decide whether abuse/harm has occurred or carry out your own investigation.

9.2 Be tactful, respect the person's privacy and follow the confidentiality guidelines.

9.3 Try to find out if the person is in contact with any support agencies.

9.4 Contact the safeguarding coordinator, who will help you decide what action to take. If you are unsure whether a matter requires further action, always contact the Safeguarding Coordinator.

10 Keeping records

10.1 You should make a record of any action you have taken in relation to safeguarding as soon

as possible.

10.2 You must remember that this record may become disclosable evidence in the event of prosecution or other proceedings.

10.3 You should record what the person said, or the incident witnessed, or details of any significant signs or behaviour that was observed, noting any names and contact details (yours and the child or adult's), dates and times.

10.4 You should make sure that accurate details of any witnesses are recorded - did anyone else hear what the person said, see footprints or notice behaviour?

10.5 Record exactly what people said, not what you think was meant; you may want to record this too, but you must distinguish fact from opinion.

10.6 This record should be kept in a safe place and given to the protection co-ordinator at the earliest opportunity, who will ensure that it is kept securely.

11 Confidentiality and data protection

11.1 Staff should never transfer personal data without the written consent of the owner, or you can do so in emergency situations when you call for police or an ambulance.

11.2 It should always be made clear that information which suggests the possibility that a person poses a serious risk to themselves or others, which may give rise to concerns about the welfare of a child or adult, or which relates to criminal activity, may need to be shared.

11.3 Discuss openly and honestly with the person (and/or their family if appropriate) at the outset why, what, how and with whom information will or may be shared and seek their consent, unless it is unsafe or inappropriate to do so.

11.4 Share information with consent where appropriate and, where possible, respect the wishes of those who do not agree to share confidential information. You can still share information without consent if you think the lack of consent can be overridden in the public interest. You should base your decision on the facts of the particular case.

11.5 When making decisions about sharing information, base your decision on the safety and well-being of the person and others who may be affected by their actions.

11.6 The information you share should be necessary for the purpose for which you are sharing it and should only be shared with people who know they should receive it.

11.7 Ensure that any information you share is accurate and up to date, shared in a timely and secure manner.

11.8 Keep a record of your decision whether or not to share information, what you have shared, with whom and for what purpose.

12 Important considerations

12.1 It is very important to gather evidence (if you have it) to support any police action. This includes any records and physical evidence.

12.2 Understand the importance of respecting and understanding the views of the child/adult, as their involvement is vital to positive intervention and support.

12.3 No one person can have a full understanding of a child or adult's needs and circumstances, and to ensure that these people who may need support get the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

12.4 It can sometimes be difficult to decide whether an action or inaction is malpractice or poor professional practice. You should ask the Head of HR to help you make a decision when the issue concerns an employee's behaviour, or the Academic Director if the issue concerns Academic staff's behaviour

12.5 The seriousness or extent of the abuse is often not clear when the alarm is first raised. It is therefore important that all allegations, warnings and concerns are taken seriously and in an unbiased manner when considering whether to make a referral.

12.6 The person responsible for making the decision to refuse a referral should clearly document how the decision was made, who was consulted in making it and what steps were taken to ensure that any risks were minimised and any support provided where appropriate, offered to the alleged victim/s.

13 Allegations against a DMUK employee

13.1 This can be an extremely complex issue. It can be difficult to accept that a colleague may deliberately harm someone. It may also be that the behaviour of concern is a bad practice rather than abuse. Any concerns should be reported to the safeguarding officers in the first instance.

13.2 If a member of staff feels that they or another member of staff may be at risk of being targeted or subjected to unfounded allegations in relation to younger or vulnerable students, they should, in the first instance, alert their line manager. The line manager should then speak to the Head of HR or the Academic Director if they feel any action is needed. The University may take action against employees who make allegations against other employees, and the University has good reason to believe that the allegation has been made in bad faith.

13.3 It is important that any response is properly coordinated and that events unfold in the correct order. Any direct action against a member of staff should, wherever possible, take into account the advice and consent of other investigating agencies (e.g. police).

13.4 It is very important that officers do not question the alleged offender about the alleged offence. However, it may be necessary to take urgent protective action, such as suspending an employee, and this should be discussed with the Head of HR or the Academic Director. It may be possible to take such action without interviewing the alleged offender. It is essential that the Head of HR and the Academic Director liaise effectively in such circumstances.

13.5 It is essential that those who have information in the context of such allegations do not share this information with anyone other than as necessary, as well as with the Head of HR and Academic Director.

13.6 If, after review and any consultation, it is clear that the matter is one of bad practice rather than abuse, DMUK will take the necessary action to advise, manage or initiate disciplinary action against the member of staff against whom the allegation has been made.

13.7 Regardless of the outcome of an investigation by the police, DMUK may consider conducting its own internal investigation in accordance with its disciplinary procedures, which may result in disciplinary action up to and including dismissal.

13.8 Liaison between the Head of HR, Academic Director and the Head of Student Development Services is vital given the close links with the University's Code of Conduct, Disciplinary Procedure and safeguarding issues.

14 Receiving personalised support

14.1 Contact with children or adults with safeguarding needs and/or those who have been abused, raising safeguarding concerns and dealing with information about violence and harm can all have personal consequences.

14.2 It is common to feel anger, powerlessness or sadness, and these feelings can be overwhelming. You may have experienced violence yourself, and being involved in safeguarding may bring back memories or cause you stress. Perhaps the safeguarding issue you have raised relates to someone you know, and you need to decide how you will treat that person in the future.

14.3 Students can get support through the Student Wellbeing service.

14.4 A safeguarding culture requires that protection from harm, prevention and early action are seen as an important part of the university's remit. This means taking action to prevent or reduce incidents that may lead to abuse or harm before they become more serious problems.

14.5 All staff must treat children and adults with whom they come into contact with dignity and respect.

14.6 Staff should be aware that providing students with personal telephone numbers, email addresses, or home addresses may put a member of staff in a vulnerable position and should therefore be avoided unless there is a strong operational justification for doing so. Student participation on social media also carries significant risks and should be limited to professional communication where possible.

14.7 Inappropriate comments of a sexual nature or unnecessary physical touching can lead to misunderstanding of boundaries between staff and students and should therefore be avoided.

14.8 Intimate relationships between staff and students are prohibited; staff should be aware that they can lead to significant difficulties. A relationship between a member of staff and a student under the age of 18 will, in most cases, be a criminal offence, and a relationship between a member of staff and an adult vulnerable to abuse will be a criminal offence in certain circumstances.

14.9 Staff should familiarise themselves with the DMUK IT Policy to identify unacceptable use of IT equipment, which includes information on the creation, transmission or display of any offensive, indecent or obscene images, data or other material, or any data that can be converted into indecent or obscene images or material.

14.10 Every member of staff can support early intervention by listening carefully to any concerns raised, being aware of the support that exists within DMUK when initial concerns arise. A relationship between a member of staff and a student under the age of 18 will, in most cases, be a criminal offence, and a relationship between a member of staff and an adult vulnerable to abuse will be a criminal offence in certain circumstances.

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16 Adherence to safer recruitment and selection practices

16.1 DMUK recruitment and selection procedures are designed to identify candidates (staff) who are known/suspected to be unsuitable to work with adults at risk or children and must be strictly adhered to.

16.2 It is important to clearly define the boundaries of staff behaviour when dealing with students. General principles are set out in the Staff Code of Conduct, but staff with managerial and supervisory responsibilities need to ensure that specific guidance is also provided for the staff member's particular role. It is also helpful to communicate these principles to staff.

17 External organisations commissioning the use of DMUK premises

17.1 The welfare of adults or children visiting the campus (without parents/carers) is the responsibility of event organisers.

17.2 DMUK expects external organisations using its premises to have safeguarding arrangements in place that support and reflect this policy.

17.3 All such organisations will be required to complete a signed declaration as part of the booking to confirm that this is the case. Without such a declaration, external organisations will not be permitted to use DMUK premises.

17.4 If children of students, staff or visitors are on DMUK premises, they remain the responsibility of their parents/guardians or substitute parents.

18 Appendix: Safeguarding Structure and Responsibilities

Safeguarding Committee

The Safeguarding Committee comprises:

- Academic Director
- Head of Student Development Services
- Head of Human Resources
- Head of Facilities

Safeguarding Coordinator

Role: Academic Director

Responsibilities:

- Maintain a strong understanding of DMUK's safeguarding culture and actively promote this across the University.
- Act as a visible point of reference, supporting staff in understanding their safeguarding responsibilities and wider wellbeing considerations.
- Serve as a role model in fostering and maintaining an appropriate safeguarding culture within the organisation.
- Ensure all safeguarding information and advice are accurate and aligned with current best practice.
- Chair the DMUK Safeguarding Board.
- Work directly with staff and students where safeguarding issues arise, liaising with Safeguarding Officers as appropriate.
- Support staff in completing safeguarding referrals and ensure all referrals are submitted to a centralised system.
- Ensure appropriate safeguarding arrangements are in place and that all staff receive safeguarding training.

Safeguarding Officers
Designated Responsibilities:

- **Students:** Head of Student Development Services
- **Professional Services Staff:** Head of Human Resources
- **Academic Staff:** Academic Director
- **External Parties and Visitors:** Head of Facilities

Responsibilities of Safeguarding Officers:

- Provide leadership and training within their respective areas of responsibility.
- Ensure appropriate safeguarding arrangements are implemented and maintained.

- Attend Safeguarding Board meetings and report any safeguarding concerns.
- Ensure compliance with relevant local safeguarding regulations.
- Participate in ongoing training to ensure knowledge and practice remain up to date.

19 Document and version control information

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Policy number	SDS-01
Owner	Head of Student Development Services
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