



**UNIVERSITY  
OF LONDON**

# Safeguarding

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**Policy contact: Director of Governance, Policy & Compliance**

**Approved by BoTs: 24<sup>th</sup> November 2021**

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## In an emergency:

If a student of the University, member of staff, or member of the public is in immediate danger or at risk of harm to themselves or others contact Security Control room on **020 7664 5568** or emergency services on **999**. You should inform the relevant Designated Safeguarding Lead as soon as possible:

## Key contacts:

### Designated University Safeguarding Lead

- Director of Governance, Policy & Compliance

### Deputy & Departmental Safeguarding Officers

- Deputy University Safeguarding Lead – Adrian Clark - Student Health & Wellbeing Manager
- Worldwide & Careers Group – Tim Wade – Director of Student Services – University of London Worldwide
- ULIP – Tim Gore (in collaboration with QMUL as appropriate)
- SAS, Research and Libraries – Elaine Walters – Director of Operations – school of Advanced Study
- Student accommodation: Thomas Seagroatt – Residential Life Manager
- Staff and Professional Services – Simon Cain – Director of Human Resources
- Visitors and 3rd parties – Glenn Marree – Director of Estates Operations

# Safeguarding

## 1. Introduction

- 1.1 The University of London is committed to ensuring the safety of everyone involved in its activities and aims to provide a safe environment for all students and staff studying and working at the University and for all visitors to its facilities.
- 1.2 The University of London recognises that it has social, moral and legal obligations to safeguard the wellbeing and safety of children, young people and adults at risk involved in any University of London activities, whether these are conducted in person or online. It further believes that students, staff and visitors to the University have the right to learn and work in a positive environment that is free from harm and all forms of prejudice, harassment, discrimination and bullying.
- 1.3 This includes the University's duty of care to safeguard children, young people and adults at risk of harm and exploitation during the course of any activity relating to the University, irrespective of duration or location.
- 1.4 All universities have a duty to take reasonable and necessary steps to ensure that children and adults at risk are safe and that reasonably foreseeable harm does not occur as a result of careless acts, deliberate acts or omissions of the institution. These measures are in addition to those required under general health and safety requirements and legislation.
- 1.5 This Policy sets out the University's responsibilities in ensuring the protection of these groups in accordance with the Safeguarding and Vulnerable Groups Act 2006. This applies to all staff, students and volunteers (irrespective of whether they act in a paid or unpaid capacity), who may be working with children, young people or adults at risk of harm through the University's teaching, research, accommodation provision or other activities, including outreach programmes.
- 1.6 It is expected that all individuals will conduct themselves whilst on University business in a professional manner, with integrity, upholding the reputation of the University at all times and in line with the University's published regulations, policies and guidance.
- 1.7 It is expected that all staff will be aware, through effective communication of this Policy and associated training, of how to recognise and respond appropriately to safeguarding concerns.
- 1.8 Those with specific responsibilities as set out in this Policy are expected to have read and understood their responsibilities, to attend training, to ensure that appropriate records are kept relating to safeguarding matters and to ensure that local procedures/arrangements for meeting safeguarding responsibilities are kept up to date and are in line with this Policy.
- 1.9 Relevant legislation: The Policy is informed by a collection of legislation and guidance, including:
  - Children Act 1989,
  - Data Protection Act 1998,
  - Sexual Offences Act 2003,
  - Safeguarding Vulnerable Groups Act 2006,
  - Equality Act 2010,
  - Protection of Freedoms Act 2012,
  - Counter-Terrorism and Security Act 2015,
  - Protecting Vulnerable Adults 2017,
- 1.10 The University's intercollegiate halls and other residential properties provide accommodation for students of the University, students of the University of London Member Institutions, students of other Universities and the public. In respect of this Policy, the University of London's duties extend to all residents in our of our properties.

## 2. Policy aims

- 2.1 This Policy aims to ensure reasonable and effective steps are taken by the University to safeguard children, young people and adults at risk, both through the provision of a safe environment and through the provision of effective and supportive mechanisms for responding to safeguarding concerns, disclosures and allegations.
- 2.2 The Policy is designed to support the activities of the University involving children, young people and adults at risk and demonstrates that the University takes safeguarding seriously.
- 2.3 The University will do so by taking the following actions:
- seeking to make the University a safe and welcoming environment for all that is free from harm and all forms of prejudice, harassment, discrimination and bullying
  - giving all staff information, training and guidance about how to recognise potential harm when it has occurred, how to respond appropriately and how to report it
  - making sure anyone can raise safeguarding concerns about any child, young person or adult at risk involved in the activities of the University
  - ensuring that staff are suitable to act in their roles, through the provision of relevant checks (including DBS) and appropriate training
  - ensuring there are staff with designated safeguarding responsibilities who are trained in responding to safeguarding concerns and disclosures and take a survivor-focussed approach
  - having an appropriate referral system in place for dealing appropriately and effectively with serious safeguarding incidents, including reporting to the relevant external organisations
  - providing accessible support services for students and staff

## 3. Responsibilities

- 3.1 The University of London has a diverse staff, student and visitor population and provides predominantly an adult learning environment. There are circumstances when children, young people and adults at risk may interact with staff and students of the University in the course of its activities. These include, but are not limited to:
- teaching, supervision and support of students including use of libraries
  - summer schools, school visits, and other activities
  - outreach or widening participation activities taking place on or off campus
  - student accommodation
  - research activities
  - public events and conferences
  - placements and other professional activities
  - field trips, excursions and other volunteering activities
- 3.2 The University has a duty of care to its staff, students and visitors and is responsible for ensuring appropriate policy, procedures, guidance, risk assessment, action planning and training are in place to facilitate effective safeguarding of children, young people and adults at risk. This includes ensuring we take reasonable steps to ensure that contractors understand, accept and are responsible for their, or their employees' conduct in connection with these groups on University premises.
- 3.3 Anyone undertaking a paid or unpaid role at the University has a responsibility to be aware of this Policy and to understand how and where to raise safeguarding concerns.
- 3.4 The University has a Designated Safeguarding Lead (DSL) who is responsible for ensuring legal and regulatory compliance and for ensuring this Policy is implemented.
- 3.5 Departmental Safeguarding leads are identified for specific University activities who ensure appropriate safeguarding arrangements are in place relating to those activities. When working with an outside organisation, departmental leads will ensure that the policies work in harmony.

### 3.6 Responsibilities of University Trustees, staff and students are set out below:

**Board of Trustees:** Has ultimate responsibility/accountability, including for putting things right. It does so by:

- approving the Safeguarding Policy
- receiving assurance that staff are trained to the appropriate levels
- receiving their own training
- receiving the outcomes of periodic reviews

**Audit and Risk Assurance Committee:** Receives reports from the Safeguarding

**Vice-Chancellor Executive group-** Accountable for safeguarding at the University through the Vice-Chancellor as Accountable Officer and responsible for:

- recommending the Safeguarding Policy to Board of Trustees for approval
- ensuring the proper implementation of this policy across the University
- submission of reports to the Office for Students (OfS) if deemed to be a reportable event
- ensuring adequate resources are in place to enact the requirements of this policy

**The Designated University Safeguarding Lead** is responsible for:

- ensuring the Safeguarding Policy is kept up to date, is accompanied by appropriate formal procedural arrangements and is implemented across the University
- ensuring that all staff, students and volunteers familiarise themselves with the University's Safeguarding Policy, understand their responsibilities, and are appropriately trained to deal with safeguarding incidents
- oversight of investigations of allegations and other disclosures
- the appointment of Designated Safeguarding Officers
- investigating and remedying any apparent non-compliance with this Policy at the University
- ensuring effective communication of the Safeguarding Policy and Procedure, including for communicating changes to it
- ensuring appropriate training is provided to all staff, commensurate with their role and responsibilities, and for ensuring the training is evaluated and kept up to date
- ensuring appropriate mechanisms are in place for recording and reporting safeguarding incidents and near misses (in accordance with the University's Data Protection Policy)
- holding the central records of safeguarding incidents
- ensuring required risk assessments are conducted and appropriate and acted upon
- attending high level training commensurate with the responsibilities of the DSL
- chairing the Safeguarding Steering Group
- providing reports to Board of Trustees and its subcommittees as necessary

**Departmental Safeguarding Officers:** In respect of each group, each Safeguarding Officer is responsible for:

- acting as the identified contact for responding to safeguarding concerns or allegations raised in the course of the University's activity
- ensuring any safeguarding concerns and incidents are appropriately recorded and reported to the Designated Safeguarding Lead
- ensuring any locally held safeguarding procedures relating to these activities are compliant with the University's Policy and have been confirmed by the Safeguarding Steering Group
- investigating causes for concern when raised under the Safeguarding Policy
- management of safeguarding incidents, including referrals to local agencies and/or referrals to internal procedures as appropriate

- chairing any investigation meetings
- providing advice to others on safeguarding concerns and handling of incidents
- assisting in the promotion of the Safeguarding Policy and written procedure
- attending required training and assisting in the delivery of training to staff where appropriate
- where appropriate, ensuring that relevant DBS checks for staff and students have taken place
- on occasion, Safeguarding officer may be asked by the Designated Safeguarding Lead to respond to particular safeguarding concerns or incidents outwith their specific activities
- ensuring contractors of the University comply with the provisions of this Policy
- ensuring an appropriate policy is in place for the management of events and conferences in compliance with the provisions of the Safeguarding Policy, including Prevent

**All staff** - Includes all University staff, students, freelance practitioners, student ambassadors, alumni, volunteers and any associated personnel acting as representatives of the University; is responsible for:

- helping to ensure the University is a safe environment, free from prejudice, discrimination, bullying and harassment by ensuring compliance with the expected behaviours and values of the University
- ensuring they understand the Safeguarding Policy and how to raise a safeguarding concern or disclosure under it
- attending training relating to safeguarding as requested
- ensuring safeguarding responsibilities are reflected in planning and risk assessments for University activities
- co-operating fully with any internal or external investigations carried out into reported concerns
- reporting any concerns, suspicions or information regarding safeguarding violations to the appropriate staff
- maintaining the confidentiality of any suspected or actual incidents
- ensuring they are aware of local safeguarding policies and procedures for the premises they are visiting when representing the University, for example when visiting schools

### **Safeguarding Steering Group**

- To review and update the University's Safeguarding Policy for approval by Board of Trustees on the recommendation of VCEG.
- To agree an Action Plan to implement the Safeguarding Policy, and amend it as required from time to time, for approval by VCEG.
- To oversee the implementation of the Safeguarding Action Plan, and to escalate to VCEG where implementation may not be achieved.
- To identify and keep under review the operation of policies and procedures which impact on the University's ability to fulfil its safeguarding responsibilities.
- To maintain an understanding of the regulatory environment including; Relevant Government legislation and Office for Students requirements
- To ensure data collection processes are in place which enable demonstration of regulatory compliance
- To ensure effective working with partners and relevant local authorities
- To report to VCEG and Audit and Risk Assurance Committee on the effectiveness of arrangements, on an annual basis.

## 4. Safeguarding situations

- 4.1 Types of situations from which children, young people and adults at risk should be safeguarded include, but are not limited to, the following:
- financial exploitation
  - sexual harassment, abuse or exploitation
  - physical, emotional, psychological abuse
  - recruitment to radical extremist organisations
  - enticement into illegal activities
  - domestic violence
  - cyber abuse
  - modern day slavery
  - bullying or harassment
  - forced marriage
  - female genital mutilation
  - discrimination
  - data breaches
- 4.2 Identifying abuse or exploitation can be difficult, but there are a number of ways in which this might become apparent:
- disclosure of the abuse – self disclosure or disclosure by a third party. This might be full disclosure or that which raises suspicions of abuse
  - signs of abuse, including physical injury for which there appears to be no satisfactory explanation
  - particular behaviour that leads to a suspicion that someone is being or has been abused or exploited
- 4.3 It is not a staff member's responsibility to decide whether a child, young person or adult at risk has been abused or harmed or subjected to abuse or harm, only to raise concerns that they may have.

## 5. Responding to safeguarding concerns relating to University staff, students or visitors

- 5.1 The safeguarding procedure is to be followed whenever a concern is raised or a disclosure made that a child, young person or adult at risk may be a victim of abuse or exploitation. It should not be used if someone is in immediate danger, when the emergency services should be called.
- 5.2 Where any member of the University becomes aware of a possible safeguarding concern or receives a disclosure or an allegation they should:
- make a written report of all the relevant details: name, student number (if relevant), detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions or observations. See Appendix B
  - contact the relevant Safeguarding Officer without delay and send them the written report
- 5.3 The Safeguarding Officer will be responsible for responding to the concern and should usually:
- Inform the Designated Safeguarding Lead
  - wherever possible and appropriate, meet with the person about whom the concerns have been raised, usually (unless in exceptional circumstances where this is impossible or inappropriate) with an appropriate professional member of staff or external agency in order to obtain their views of the situation
  - take a written record of any such meeting
  - reach a decision on what action is required appropriate to the person's safeguarding needs and the situation, including referral to external agencies where appropriate

- 5.4 Depending on the circumstances of the case and whom is involved, the Safeguarding Officer may also need to refer the matter under the relevant University Regulations and Policies (see Appendix for list of related policies).
- 5.5 If the matter is the subject of a criminal investigation, the University is entitled to pursue its own or complementary confidential enquiries and disciplinary action. The Designated Safeguarding Lead will consult with the relevant agencies in such cases.

## 6. Responding to safeguarding concerns relating to children, young people or adults at risk who are not members of the University

- 6.1. The University may become involved in activities which include children, young people and adults at risk who are not members of the University.
- 6.2. For some of these activities, it is likely that the Safeguarding Policy of another organisation may need to be followed.
- 6.3. Where any member of the University staff or student becomes aware of a possible safeguarding concern or receives a disclosure in these circumstances they should:
- make a written report of all the relevant details: name, student number (if relevant), detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions or observations. See Appendix B
  - contact the relevant Safeguarding Officer without delay and send them the written report
- 6.4. The Safeguarding Officer will be responsible for responding to the concern, primarily in the first instance by referring the matter to the relevant organisation's named contact (for example, by contacting the Safeguarding Lead of the school where this relates to a school visit at the University).
- 6.5. If the organisation's Safeguarding Lead cannot be contacted immediately, the Safeguarding Officer will need to take a decision as to whether the matter can wait or whether urgent action needs to be taken to safeguard the individual concerned. The Safeguarding Officer should seek advice from the Designated Safeguarding Lead where appropriate.

## 7. Reporting

- 7.1 The University is responsible for ensuring it maintains accurate records of safeguarding concerns, allegations and disclosures in accordance with the University Data Protection Policy. The Designated Safeguarding Lead is responsible for ensuring mechanisms for appropriate recording are in place and for onward (anonymised) reporting into the University's Audit and Risk Assurance Committee and Board of Trustees.
- 7.2 Safeguarding concerns, allegations and disclosures are treated in confidence.
- 7.3 To ensure the safety and welfare of all children, young people and adults at risk, information is shared with organisations who will be involved in addressing the safeguarding concern (this may include other educational organisations, the local authority, the police). Every effort will be made to gain the consent of the individual prior to sharing information but information may be shared without consent where there is good reason to do so. The child, young person or adult at risk should be advised that the information will be shared with those who will address the concern. The University's record will include who has been given the information and why.



## Appendix A - Definitions

### **Child /children/**

a person / people under the age of 18

### **Young people**

children who are 16 or 17 years old

### **Adults at risk**

an adult is any person aged 18 or over. Some adults may be deemed at risk and therefore, entitled to be safeguarded because they are unable to protect themselves against harm or exploitation. An adult at risk may be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs such that their capacity is reduced
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer, such as, a family member/friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to make a decision and is in need of care and support

### **Age of consent in the UK**

a person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the Sexual Offences Act 2003 for an adult in a position of trust to engage in sexual activity with a person under the age of 18. Staff employed by the University are in a position of trust when working with children and young people.

### **Safeguarding**

taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially adults at risk and children, from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across all activities associated with the University. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until a decision is made.

## Appendix B

### Safeguarding Incident Report Form

This form is to be used to record basic information in the light of an allegation, suspicion or disclosure of a potential safeguarding concern. Completing this record should not stand in the way of contacting Police or other agencies in the event of an emergency or urgent safeguarding incident.

**Name of the person completing this form (YOU):** **Date and time of completing this form:**

.....

**Your position or relationship to who your safeguarding concern is about:** **Your telephone number:**

.....

**Your Address:**

.....

**Name/names of person/s the safeguarding concern or incident is about:** **Date and time of any incident:**

.....

**Address (if known) of person the safeguarding concern is about:**

.....

**Telephone number (if known) of the person the safeguarding concern is about:** **Age and Date of Birth of alleged victim (if known):**

.....

**Name and Address of Parent, carer or guardian of alleged victim:**

.....

**Telephone Number:**

.....

**What have you witnessed or been told?**

.....

.....

**Has the alleged victim said anything to you? (do not lead or investigate – Just record actual details):**

.....

.....

**Action taken so far:**

**External agencies contacted?** yes ☐ no ☐ **999 or Social Services?** yes ☐ no ☐

**Name and contact number:**

.....

**Advice received:**

.....

**Signature:**

.....

A copy of this form should be sent to the relevant Designated Safeguarding Lead as soon as possible but after any urgent or emergency calls that you feel need to be made.

If you would like more information,  
please contact: [safeguarding@london.ac.uk](mailto:safeguarding@london.ac.uk)

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