

# Safeguarding Policy

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**Approved by:** *The Vice-Chancellor's Executive Team*

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# Safeguarding Policy

## 1. Introduction

### Purpose and Aim

- 1.1 The University recognises it has a duty of care to safeguard children and vulnerable adults who may participate in any activity or research, organised or managed by the University, or, who come into contact with University employees or students on or off campus. Safeguarding means protecting children and vulnerable adults who are at risk of harm, abuse, neglect, exploitation, discrimination or of being drawn into radicalisation
- 12 The University has Cause for Concern Guidelines which include the University's approach to prevent people from being drawn into terrorism. This is known as the Prevent Duty.
- 13 The University recognises that within the course of their activities, its employees and students may come into contact with children or vulnerable adults. The use of the term employees, in this policy, includes casual and agency workers volunteers and contractors.
- 14 This policy sets out how the University will deal with concerns that are raised that a person may be at risk of exploitation, harm or abuse (including radicalisation), and the action that the University may take to manage such matters and to provide support. It should be read in conjunction with the Cause for Concern Guidelines, which provides a range of advice and contacts for helping students. The link is here: [Cause for concern guidelines](#)
- 15 For the purposes of this Policy the term "the University" is deemed to include all of those participating in any University business and representing the University.
- 16 The University wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children and vulnerable adults. The University is committed to adherence to legal responsibilities and good practice that protects children and vulnerable adults, working in partnership with appropriate organisations to facilitate this. We are committed to taking appropriate prompt action to protect children and vulnerable adults from harm and to respond to any allegations or suspicions.

### Scope

- 1.7 This policy is designed to assist the University to achieve the commitments set out above and to take reasonable steps to safeguard those who are vulnerable by ensuring there are clear guidelines and procedures for identifying risk, reporting concerns and taking action.
- 1.8 Examples of areas where the University may have contact with children and

vulnerable adults who may be vulnerable may include (this is not an exhaustive list):

- Admission of, teaching, supervision and support of students who are under 18 years of age or who are vulnerable adults;
- Summer schools, school visits, and other events such as work experience;
- Apprenticeships or employment of vulnerable adults;
- Outreach or widening participation activities taking place on or off campus;
- Student residences and the conference office for residential events;
- Placements in professional and clinical settings;
- Field trips, excursions and other activities such as volunteering and other social activities;
- The activities of student societies and networks.

## **Definitions**

### **1.9 Vulnerable Adult**

The University defines a vulnerable adult as a person aged 18 or over who is, or may be, in need of services by reason of mental or other disability, age or illness (including an addiction to alcohol or drugs) or is living in a sheltered or residential care home and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation, including being drawn into terrorism.

### **1.10 Child**

The University defines a child as a person who is under the age of 18.

## **2 Identifying Safeguarding Concerns**

### **Key Principles**

- 21 The University will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly. Examples of harm or abuse are found here: [Examples of harm or abuse](#)
- 22 The University will ensure that processes are in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. The University will ensure that appropriate suitability checks are carried out in relation to staff and students including Disclosure and Barring Service (DBS) enhanced checks with child barred lists and other checks where appropriate. DBS checks are reviewed or updated every 3 years for relevant employee groups.
- 23 Safeguarding referrals to the relevant statutory authority will be made on the basis of identified and considered risk.

- 24 University staff dealing with students or staff who are subject to safeguarding concerns will consider what support may be offered to them both from within the University (e.g. reasonable workplace adjustments for staff and support from Student Support for students) and externally (e.g. Occupational Health for employees).
- 25 For the employment of children as apprentices or for providing work experience, or, the employment of vulnerable adults, please see here: [Employing children, apprentices, etc](#)
- 26 Internal and External activities' organisers, where there will be participants under the age of 18 or vulnerable adults must complete a risk assessment. Please see here: [Link to risk assessment](#)
- 27 It is not possible to guarantee confidentiality when a safeguarding concern is reported because the University owes a duty of care towards its staff, students or visitors and the University may need to take action on receipt of a report of a safeguarding concern that may result in the same being reported to an external third party. However, any reports will be dealt with sensitively and only disclosed to those people who need to be made aware of an incident or concern, whether internal or external to the University.

### **What is a Safeguarding Concern?**

- 28 Examples of safeguarding concerns include, but are not limited to:
- a. A child or adult raises an allegation of abuse, harm or other inappropriate behaviour.
  - b. A student or employee discloses information involving themselves or others which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable adults or children involved in University activities.
  - c. There are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation). The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not an employee's responsibility to decide whether a child or vulnerable adult has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have.
  - d. There are observable changes in a child or a vulnerable adult's appearance, or, behaviour that may be related to exploitation, harm or abuse (including radicalisation). Possible indicators that someone is being abused or neglected include (but are not limited to): changes in behaviour, such as becoming quieter, withdrawing from activities, contact or communication, losing weight or appearing malnourished, deterioration in

appearance, dirty clothes, unkempt look, struggling with money, having cuts, bruises or injuries that can't be explained.

- e. A concern is raised that a person presents a risk of abuse or harm towards a child or a vulnerable adult in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material.
- f. Concerns arise that a student or employee is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

### **3. Reporting Safeguarding Concerns**

#### **Designated Safeguarding Officers**

- 3.1 For any safeguarding concerns involving **employees**, the appropriate person to report concerns to is the **Director of HR**. Contact details, below.

For any safeguarding concerns involving **students**, the appropriate person to report concerns to is the **Head of Student Support**, who is the University's Child Protection Coordinator. Contact details, below.

The Director of HR and the Head of Student Support are the University's Designated Safeguarding Officers. The Designated Safeguarding Officers may delegate responsibility under this Policy to an appropriate nominee.

If the Designated Safeguarding Officer or nominee is not available, or the safeguarding concern involves a concern against them, then the referral should be made to the Head of Governance.

#### **Responsibilities of the Designated Safeguarding Officers**

- 3.2 It is the responsibility of the Designated Safeguarding Officers to:
- 3.3 Undertake relevant training in safeguarding procedures and ensure their knowledge is kept up to date;
- 3.4 Act as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
- 3.5 Act upon concerns as appropriate in the circumstances, for example, by carrying out a risk assessment in accordance with this Policy and acting in accordance with the outcomes. This may range from taking no further action to making external referrals for example to Social Services or the Police; and in consultation with HR, considering the appropriateness of a precautionary suspension.
- 3.6 Monitoring the implementation of this Policy and procedure.**
- 3.7 In addition to the explicit responsibilities set out above, all managers have a

responsibility to ensure employees and students are aware of safeguarding and are able to refer concerns appropriately.

## Reporting Safeguarding Concerns

- 3.8 A safeguarding concern is reported by completing a **Safeguarding Referral Form** (appended to this policy). The form should be submitted by email to the appropriate Designated Safeguarding Officer as promptly as possible, but generally within 24 hours of the incident giving rise to the concern. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one due to uncertainty. Employees may wish to discuss safeguarding concerns with the Designated Safeguarding Officer should they be in any doubt as to whether to make a report.
- 3.9 If you wish to report a concern anonymously, this will be considered but may not be possible depending upon the nature of the concern raised.
- 3.10 External bodies who may be able to provide support are here: [Link to other support](#) All students are able to access support from the Support & Welfare team; [Support&Welfare@regents.ac.uk](mailto:Support&Welfare@regents.ac.uk)

## 4. Taking Action

Upon receipt of a **Safeguarding Referral Form**, the Designated Safeguarding Officer (or an appropriate nominee acting on their behalf) will undertake an analysis of risk to determine the appropriate course of action.

The analysis of risk will be carried out by the Designated Safeguarding Officer (or their nominee) as the Designated Safeguarding Officer (or their nominee) considers appropriate. This may include the Designated Safeguarding Officer (or their nominee) speaking to the person making the report and the individual who is the subject of the report.

- 4.1 The Designated Safeguarding Officer (or their nominee) is responsible for ensuring that a detailed record of the risk assessment process and the outcome of the assessment is made, and any appropriate follow up action is undertaken. The risk assessment will be undertaken by the Designated Safeguarding Officer (or their nominee) completing a **Safeguarding Action Form**, appended to this policy

When completing the form, the Designated Safeguarding Officer may decide upon one of the following, or, other appropriate actions:

- a) That no further action is required.
- b) To refer the concerns Human Resources, in order for them to advise if a precautionary suspension is required.
- c) To refer the matter to an alternative University policy or procedure, such as

the Staff or Student Disciplinary Procedure or the Fitness to Study or Practice procedure.

- d) To report the matter to the Police, Social Services or alternative appropriate external agency.

If an employee or student, has any immediate safeguarding concerns (including outside normal University hours) they may refer directly to the Police or Social Services, but otherwise they should follow the internal referral process described in this Policy. If a referral to Social Services or the Police is made, the employee or student should inform the appropriate Designated Safeguarding Officer at the earliest opportunity.

- 4.2 The Designated Safeguarding Officer (or their nominee) will liaise with other partner agencies as appropriate in order to address the safeguarding concerns identified.
- 4.3 The University reserves the right to take action under its disciplinary procedures and/or its fitness to practice procedures and/or fitness to study procedures should it later receive information that suggests that its conduct standards may have been breached and/or that reported safeguarding concerns give rise to an allegation that a student is not fit to practice/study. Employees or students who are dismissed from the University and/or found unfit to practice/study as a result of safeguarding concerns will be reported to the Disclosure and Barring Service and any relevant professional body.
- 4.4 Support from internal or external services, such as the local safeguarding authority, will be provided as appropriate for any individuals, staff or students, impacted by safeguarding issues.

## **5 Retention of Information**

- 5.1 The University complies with the principles of the Data Protection Act 2018 in the way that it retains and disposes of personal information.
- 5.2 Written records of any safeguarding concerns will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.
- 5.3 Such written records will be held centrally and separately from an employee's or student's personal records.

## **6. Training**

- 6.1 All employees and students whose roles and responsibilities include regular contact with children and vulnerable adults in a supervisory role will receive training and guidance appropriate to their role. All employees will be made



aware of this policy and procedure. All employees will undertake mandatory safeguarding training.

## **7 Review of Policy and Procedure and Safeguarding Monitoring**

- 7.1 The Vice-Chancellor's Executive Team will review this policy every two years and is responsible for overseeing and updating this policy and procedure particularly with respect to the legal obligations and other external requirements.
- 7.2 Safeguarding monitoring will be reported annually to the Academic Committee for students and the Health and Safety Committee for staff.

### **Key Contacts**

**Pam Taylor**, Head of Student Support and **Designated Safeguarding Officer (students)** +44 (0) 207 487 7593 [Taylorp@regents.ac.uk](mailto:Taylorp@regents.ac.uk)

**Valerie De Saegher**, Director of HR and **Designated Safeguarding Officer (employees)**, [DeSaeghV@regents.ac.uk](mailto:DeSaeghV@regents.ac.uk)

**Rebecca Collins**, Senior Student Support and Welfare Officer +44 (0) 207 487 7863  
[CollinsRe@regents.ac.uk](mailto:CollinsRe@regents.ac.uk)

**Grant Valentine**, HR Business Partner, +44 (0) 203 075 6118  
[valentineg@regents.ac.uk](mailto:valentineg@regents.ac.uk)

**Tim Harrison**, HR Business Partner, +44 (0) 203 075 6122 [harrisont@regents.ac.uk](mailto:harrisont@regents.ac.uk)

### **Local Authority Designated Officer (LADO)**

#### **Westminster**

Please call 0207 641 7668 and ask to speak to the Duty Child Protection Advisor  
Or email [lado@westminster.gov.uk](mailto:lado@westminster.gov.uk)

### **Related Policies and Procedures**

- Student Code of Conduct
- Student Complaints Policy
- Student Disciplinary Policy
- Fitness to Study
- Fitness to Practice
- Cause for Concern
- Accommodation U18 Guidelines
- U18 Consent to Study
- U18 Procedure
- Bullying, Harassment and Sexual Misconduct Policy
- Staff Disciplinary Procedure
- Staff Grievance Procedure

## **Relevant Legislation**

- Equality Act, 2010
- Adults with Incapacity Act, 2000
- Sexual Offences Act, 2009
- The Adult Support and Protection Act, 2007
- Counterterrorism and Security Act 2015
- Keeping children safe in education 2020
- Safeguarding Vulnerable Groups
- Working together to safeguard children 2018
- The Data Protection Act, 2018

## Appendix 1

### Safeguarding Referral Form (to be completed by person reporting the concern)

Name of child/vulnerable adult (if known):	
Date of birth or age (of child):	Gender: (M/F)
Description of the safeguarding issue. Description might include a factual account of something you have witnessed or an account of something a third party has reported to you.	
Time, location, date of the incident/s: (if known)	
Any other observations/information:	
Name of individual reporting the concern:	
Position:	
Action undertaken by person reporting the concern:	
Date concern reported:	

**Appendix 2 Safeguarding Action Form (to be completed by the Safeguarding Officer)**

Is the child or vulnerable adult who is the subject of the concern at immediate risk?	<b>Yes /No</b>  <b>Details:</b>	
Does the incident relate to an allegation about a student or employee?		
Should the staff or student be referred to HR or Student Support for consideration of a precautionary suspension?		
Does the reported incident require referral to Social Services?		
Does the reported incident constitute a criminal offence requiring referral to the Police.		
<b>Actions to be Undertaken</b>	<b>Y/N</b>	
No further action		
Referral to the Student Support or HR for consideration of a precautionary suspension.		
Referral to an alternative University policy or procedure such as the Staff or Student Disciplinary Procedure.		
Report the matter to the Social Services		
Report the matter to the LADO		
Report the matter to the police		
Signed:		
Date:		

