

## **IMPERIAL COLLEGE LONDON SAFEGUARDING - CODE OF PRACTICE**

This Code of Practice complements the Child Protection and Adults at Risk Safeguarding Policy and provides more detailed guidance and links to supporting procedures.

### **INDEX**

1. **DEFINITIONS**
2. **RESPONSIBILITIES**
3. **SAFER RECRUITMENT**
4. **REGULATED ACTIVITY AND THE DISCLOSURE AND BARRING SERVICE (DBS) CHECKS**
5. **SAFEGUARDING - PROACTIVE MEASURES AND SUPPORT - STUDENTS UNDER THE AGE OF 18**
6. **RESEARCH ACTIVITY**
7. **EARLY YEARS EDUCATION CENTRE**
8. **STUDENT RECRUITMENT AND OUTREACH ACTIVITIES**
9. **WORK EXPERIENCE**
10. **CHILDREN USING FACILITIES THROUGH COMMERCIAL EVENTS**
11. **CHILDREN VISITING IMPERIAL COLLEGE EVENTS OPEN TO THE GENERAL PUBLIC**
12. **ONLINE SAFE WORKING**
13. **GUIDELINES FOR STAFF AND STUDENTS**
14. **REPORTING CONCERNS**
15. **LINKED POLICIES AND GUIDANCE**

## 1. DEFINITIONS

**Definitions:** For the purpose of this Policy and the associated Code of Practice, the following definitions will apply:

**“Child” or “Children”:** The statutory guidance “Working Together to Safeguard Children”<sup>1</sup> defines a “child” as anyone who has not yet reached their 18th birthday. The terms “child” and “children” will be used to describe all children and young people under the age of 18 years.

**Adults at risk”:** safeguarding duties apply to an adult who:

- has needs for care and support;
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.<sup>2</sup>

## 2. RESPONSIBILITIES

**The Director of Safeguarding**<sup>3</sup> is the University’s Child Protection Officer and Designated Accountable Officer for Ofsted. This role will have responsibility for the day-to-day implementation of the policy and code of practice with advice from Imperial College’s Safeguarding<sup>4</sup> Network.

**Lead Safeguarding Officers.** These are the Director of Safeguarding, the Director of Student Services, the Head of Outreach Programmes and the Head of the Early Years Education Centre. They act as the main contacts in the University for the protection of children and adults at risk and may take the lead in making referrals to the DBS, the Police and/or the Local Authority Designated Officer as appropriate.

**Local Safeguarding Officers.** Act as the main contact in their area for the protection of children and adults at risk and the person to whom staff should raise initial concerns, including low level safeguarding concerns. They are responsible for escalating serious concerns or risks to Lead Safeguarding Officers as appropriate.

[Contacts for further support](#)

**Staff Compliance team.** The Staff Compliance team has a responsibility for obtaining DBS checks for members of staff, prospective staff, casual workers (including student workers), volunteers and honorary contracted workers where these individuals require a check. This will be done in liaison with the individual and/or department concerned, and the team will take the lead in considering any disclosures made as a result of the check. [Contact Us.](#) Separate arrangements are made for student checks, for the Global Summer School and Outreach workers and for Community Engagement activities with vulnerable adults.

---

<sup>1</sup> [Working together to safeguard children](#) & [Keeping children safe in education](#)

<sup>2</sup> [Care Act 2014](#)

<sup>3</sup> Director of Safeguarding - Louise Lindsay - [l.lindsay@imperial.ac.uk](mailto:l.lindsay@imperial.ac.uk)

<sup>4</sup> [Safeguarding Network Membership](#) & [Safeguarding terms of reference](#)

**Imperial College's Safeguarding Network** is coordinated by the Director of Safeguarding. The membership includes representatives who have lead responsibility for activities involving under 18s or vulnerable adults across the University. The network contributes to (1) protocols and procedures that reflect a best practice approach to safeguarding (2) practice guidance to ensure clear accountability and training for those with responsibility for safeguarding (3) the sharing of learning and casework developments to improve awareness and compliance.

**Faculty Deans, Heads of Departments/ Divisions** and managers have delegated responsibility for the implementation of the Safeguarding policy and code of practice in their own areas. They are supported by Faculty Operating Officers, Faculty Senior Tutors, Research Leads and Professional Services teams in doing so.

**Individual staff members** of staff are responsible for familiarising themselves with the Policy and undertaking the mandatory e-learning safeguarding training. They must inform colleagues and/ or managers of any requirements to comply with the safeguarding policy and code of practice, for example, a need for further training.

### 3. SAFER RECRUITMENT

Imperial College is committed to **safe recruitment, selection and vetting** and has a **statutory responsibility** to ensure background checks are undertaken for all roles (employed or voluntary) that will work with children and young people under the age of 18 and those working with vulnerable adults.

The steps to minimise the risk of appointing someone **unsuitable for any role working with young people under the age of 18 and vulnerable adults**, are as follows:

- The role description and person specification will highlight the safeguarding responsibilities.
- A [Risk Assessment checklist for roles involving contact with children or vulnerable adults](#) should be completed.
- Job advertisements will include a statement about Imperial College's commitment to safeguarding children and those who are vulnerable.
- Where a criminal records check is required then this will be made clear in the [advertisement](#).
- Applicants will be required to declare any relevant criminal convictions and child protection investigations. Declarations will be considered, and risk assessed in line with Imperial College's [DBS Procedure](#).
- Applicants will be required to provide a full employment history, and any gaps in employment will be reviewed and addressed during interview. Curriculum vitae will not be accepted without a completed application form.
- Applicants working with under 18s should be advised that, in line with statutory guidance, online searches may be carried out for shortlisted candidates to identify any incidents or issues related to suitability to work with children. This may include, as examples, drug or alcohol misuse, inappropriate images, or the expression of views that appear to contravene the University's legal obligations (for example, under the Equality Act or Prevent Duty). Searches will be confined to open-source information freely available to the public. Any information noted that gives cause for concern will be reviewed and discussed with the applicant at interview and will not be a barrier to interview. A template for recording online searches is available here [Safer recruitment online search template](#)
- Interviewers will ask questions to ensure applicants have a commitment to safeguarding and understand the need to raise low level concerns as part of the proactive culture of safeguarding at Imperial College.

- Statutory procedures for checking the suitability of staff who work with children and those who undertake regulated activity with vulnerable adults will be followed. This includes obtaining enhanced criminal records checks and barred list checks via the DBS, with overseas police background checks where relevant. Gaps in employment or education are checked and detailed references taken up.
- Applicants must provide details of at least two referees, including from their current or most recent employer or place of study. Referees will be asked about the candidate's suitability and ability to work with under 18s and vulnerable adults.
- The authenticity of the identity of the referee will be reviewed and checked. Where information is not available, for example an overseas reference, recruiters should gather sufficient information from other sources to ensure that there has been a thorough background check.
- Identity and right to work checks will also be undertaken prior to commencement in employment.
- All staff will be required to take Imperial College's safeguarding e-learning modules within the first six months of employment and regular refresher training thereafter.

#### **4. REGULATED ACTIVITY AND THE DISCLOSURE AND BARRING SERVICE (DBS) CHECKS**

DBS checks are a fundamental part of safeguarding when working with children or vulnerable adults in regulated activity. It is a criminal offence for an employer to knowingly place staff (including casual workers, honorary and volunteers) or volunteers who will be carrying out regulated activity if they have been barred by the DBS from work in those positions.

The full definition of regulated activity is available on HR webpages [Guidance on the eligibility for statutory DBS checks](#). In summary, for work with children, regulated activity is unsupervised work if done regularly. Regular means contact with a child or group of children carried out by the same person frequently (once a week or more often), or on four or more days in a 30-day period or overnight.

The University is registered with a third-party provider (Mayflower Disclosure Services Ltd) for DBS checks and will ensure that a check is conducted when required. When recruiting an overseas candidate, it may be necessary to ask the candidate to apply for a [criminal records check overseas](#) or certificate of good character.

The University is not legally permitted to apply for enhanced checks unless the role requirements match the criteria set by the DBS. When interviewing students for places on degree programmes, given the short, one-off nature of such interviews, a DBS check is not required but it is good practice not to have one sole interviewer. Risk assessments should be in place. More information on eligibility criteria is included on the HR webpages [Guidance on the eligibility for statutory DBS checks](#)

For posts where DBS checks are an essential and ongoing requirement, the individual will be required to subscribe to the DBS Update Service which will allow regular checks on the DBS status without the need for the individual to reapply for a check.

#### **5. SAFEGUARDING - PROACTIVE MEASURES AND SUPPORT - STUDENTS UNDER THE AGE OF 18**

The procedures set out in the Imperial College London [Policy and Procedure for Admitting Students Under 18 Years of Age](#) will be followed and the applicable

declaration completed and signed.

For these students, good practice means that the University will:

- Inform parents and guardians that it does not act in the place of a parent;
- Have a list of the student's emergency contact details, in particular those of parents and guardians.

It is the responsibility of the relevant **Head of Department/ Division** to identify at the earliest possible opportunity children who will be studying in the department. They must notify the appropriate members of staff of these students, ensuring risk assessments are in place for all activities and liaising with Staff Compliance for DBS clearance where required.

Where a student under the age of 18 is admitted to the University and is to be placed in an **Imperial College Hall of Residence**, Wardens, Sub- Wardens, Assistant Wardens and any staff at student residences engaged in caring for, supervising or providing advice or guidance to children on a regular basis are likely to be carrying out regulated activity and will therefore be subject to a DBS check for a Child Workforce including the Children's Barred List check. The Director of Student Services will advise the Staff Compliance team of new personnel to ensure that necessary checks are made prior to commencement of employment. It is Imperial College Policy not to accommodate students under the age of 16 in Halls of Residence.

As a condition of admission, **students applying for subjects or postgraduate research** that will come into regular contact with children are required to be checked through the DBS. The same condition will apply to students undertaking regulated activity in relation to vulnerable adults.<sup>5</sup> Medical Students on clinical placements are required to be DBS checked and to comply with requirements of the relevant NHS Trust.

**The Imperial College Union** will undertake DBS checks where student volunteers are undertaking regulated activity organised by the Imperial College Union, or where it is requested by a host organisation.

## 6. RESEARCH ACTIVITY

Staff who undertake work or research with regular access to children or undertake regulated activity with vulnerable adults will need to be DBS checked. All staff should complete the University's mandatory safeguarding e-learning.

Research sponsors will usually require risk assessments and audits with a broader definition of safeguarding. Further guidance on safeguarding considerations for research activity is available on the Imperial College's safeguarding webpage [Safeguarding for Research Projects](#)

## 7. EARLY YEARS EDUCATION CENTRE

All staff working at the Early Years Education Centre are required to be enhanced level DBS and Children Barred List checked before commencing work. If the DBS check has not been processed before the commencement of employment, then a risk assessment

---

<sup>5</sup> For DBS purposes, regulated activity in relation to adults, is defined in the Safeguarding Vulnerable Groups Act 2006 and as amended by the Protection of Freedoms Act 2012.  
<https://www.gov.uk/government/publications/new-disclosure-and-barring-services>

will be carried out and all contact with children will be supervised until DBS clearance has been received.

Visitors to the Early Years Education Centre will be supervised at all times.

The Early Years Education Centre has in place its own detailed [child safeguarding policies](#) relevant to the activities undertaken and the recruitment of staff. This includes how the setting complies with the welfare requirements of the early years foundation stage (EYFS). It links to policies and procedures to safeguard children including requirements restricting the use of mobile phones and cameras in the setting.

The NSPCC guidance on use of images and the Information Commissioner's Office guidance on taking photographs for all other activities is available on [guidance on use of images](#) webpage.

## **8. STUDENT RECRUITMENT AND OUTREACH ACTIVITIES**

All staff (both employees and casual workers) and students who are employed or volunteer to undertake a project in Marketing, Outreach, Recruitment and Admission (MORA), who are or will be engaged in caring for, supervising or providing advice or guidance to children on a regular basis will be required to undergo a DBS check. MORA offer a DBS checking service for student volunteers and workers engaged with their programmes to use, whereas staff will need to use the service provided by Staff Compliance.

The Outreach Department has in place a detailed [Safeguarding and Child Protection Policy](#) relevant to these activities.

## **9. WORK EXPERIENCE**

Staff who supervise children under 18 who are on unpaid work experience placements within the University will require a DBS check if they will be supervising the child for more than three days in any 30-day period. They will not themselves be supervised during contact. In addition, a risk assessment must be undertaken, and suitable arrangements must be implemented in line with the mitigations set out in a risk assessment. (DBS checks are not required for staff who supervise children undertaking paid work, training, or induction (e.g. apprenticeships) if they are aged 16 or over as this is not considered regulated activity). Please view [guidance on work experience placements](#) at Imperial.

## **10. CHILDREN USING FACILITIES THROUGH COMMERCIAL/THIRD PARTY EVENTS**

Imperial College will ensure that all activities involving children and/or adults at risk have appropriate safeguarding policies in place that meet Imperial College's policy and guidance, including risk assessments of the space being used. All commercial and third party clients will be required to disclose any safeguarding issues or concerns that have emerged in connection with any activity on or linked to University premises.

## **11. CHILDREN VISITING IMPERIAL COLLEGE EVENTS OPEN TO THE GENERAL PUBLIC**

When arranging an event that may involve child visitors, organisers will prepare a [risk assessment](#) and ensure that appropriate measures are put in place in line with Imperial College's policy and guidance on working or volunteering with children. In advance this

will include planning activities and events thoroughly, gaining consent for participation, recording child needs (medical, dietary, allergies, care), and collecting information that might be needed in an emergency readily available. On the day it will require access to first aid with training in health and safety and accident prevention including lost child protocols. Adequate supervision and contingency cover must be in place with out of hours contact where applicable. All accidents, near misses and low-level concerns must be recorded and assessed for any lessons to be learned. The Director of Safeguarding will meet with those responsible for organising events on a regular basis to discuss preparation and reviews learning from events with young people.

The University Safety Department has specific information on arrangements that should be in place for children and young persons on campus and this is available on Imperial College's Safety webpage [Children and young persons on campus](#).

## 12. ONLINE SAFE WORKING

*Keeping children safe in education* requires organisation to ensure that children are safeguarded from potentially harmful and inappropriate online material. This requires the protection and education of both students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Key areas of risk are:

- being exposed to illegal, inappropriate, or harmful content;
- being subjected to harmful online interaction with other users; for example: peer to peer pressure;
- online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images or online bullying;
- commerce risks such as online gambling, inappropriate advertising, phishing and or financial scams.

An example of risk assessment and mitigation for online safety of young people when delivering learning and activities via Teams or other online platforms is available [Risk Assessment example](#)

## 13. GUIDELINES FOR STAFF AND STUDENTS

The mandatory e-learning safeguarding [training](#) is required for all staff including students undertaking paid or voluntary work with young people both in person and online. The training supports with information on how to recognise and respond to child protection and safeguarding issues and how to report and record concerns.

The training includes content to raise awareness of the importance of dealing with child-on-child abuse and is supplemented by guidance documents on how to prevent and respond to bullying online and offline<sup>6</sup>.

Staff and student workers or volunteers should take steps to ensure that they do not put themselves in a position where an allegation can be made against them. Such consideration might involve, but is in no means limited to:

- Treating children, and adults, with respect and dignity at all times;
- Ensuring that interaction with children occurs in the company of others wherever possible to ensure that an allegation of improper behaviour does not arise;

---

<sup>6</sup> [Harassment and bullying support](#)  
[Bullying and harassment](#)  
[Child on Child/Anti-Bullying Policy](#)

- Retaining a professional approach to children which will involve behaviour such as not divulging home telephone numbers or addresses, refraining from any social media interaction, ensuring that there is no physical contact, avoiding inappropriate familiarity, including discussing matters of a sexual nature, maintaining self-control and being sensitive to issues that can be misconstrued;
- Seeking guidance from a Safeguarding Officer on their own interactions with children if they have any concerns about their appropriateness or the possibility of them being misconstrued.

**All staff should:**

- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Share information where children may be at risk, even if this relates to concerns outside the University, for example, domestic abuse;
- Adhere to the principles and procedures contained in Safeguarding and Child Protection policy;
- Recognise the power balances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused;
- Share low-level concerns;
- Report and challenge abusive adult activities, such as ridicule or bullying;
- Share concerns about inappropriate adult behaviour with the Lead Safeguarding Officer including behaviour not directly involving children but that indicates an adult may not be suitable to work with children;
- Be confident and understand the Whistleblowing policy and procedure;
- Take responsibility for their own continuing professional development;
- Use appropriate language at all times.

**Staff should not:**

- Play inappropriate physical contact games;
- Engage in inappropriate verbal banter;
- Make suggestive remarks or gestures or tell jokes of a sexual nature;
- Fail to act upon and record any allegations made by a child or adult;
- Believe that an allegation could not be made against them – it could;
- Give their personal contact details – such as home or mobile phone number, email or home address – to any child, parent or adult at risk, without prior permission from the Head of Department;
- Make contact with, or allow contact from children, parents or adult at risk, within social networking sites;
- Investigate complaints or view harmful content without reference to a Lead Safeguarding Officer;
- View potentially explicit content involving under 18s on devices. Suspected illegal activity must be referred to the Police.

Any employee or volunteer at the University who comes into contact with children under the age of 18 is considered to be in a position of trust, whether or not they meet the strict legal definition. Any sexual activity between an employee or volunteer and a child with whom the employee or volunteer has come into contact through activities carried out in the course of their employment or volunteering will be treated as a very serious disciplinary matter and could lead to dismissal or a termination of contract. Anyone who meets the legal definition of "position of trust" under the Sexual Offences Act 2003 and who engages in any sexual activity with a person under 18 is also committing a criminal offence, and such cases will be reported to the Police.

## 14. REPORTING CONCERNS

Staff should familiarise themselves with the reporting and escalation procedures for raising concerns. Staff should not investigate complaints or issues involving under 18s or issues without reference to a [Lead Safeguarding Officer](#)

The University recognises the importance of raising low level concerns (no matter how small) as part of professional responsibility and a proactive approach to learning and training within our safeguarding culture. The low-level concerns guidance is covered in the mandatory safeguarding e-learning training and on the safeguarding webpages [Guidance on raising Low level safeguarding concerns](#).

Specific guidance on protection from radicalisation and extremism is available in the online training and on the [webpages](#).

All risk assessments for events with overnight arrangements will include an out of hours contact for oversight of case safeguarding issues that may arise outside normal office hours.

It is the responsibility of the Head of Department to ensure adequate arrangements are in place and staff understand how to recognise, respond and report concerns. Further guidance on safeguarding internal and external referral routes are available on the [Reporting Concerns](#) safeguarding webpages.

### a. Investigations and outcomes

Where concerns or complaints have been raised about the conduct of an individual, these will be investigated in line with the [University's Disciplinary procedures](#). The HR webpages provide further information on the support and advice available to individuals against whom allegations have been made.

Safeguarding investigations will note allegation outcomes using the following definitions:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The Lead Safeguarding Officer will guide on appropriate action and may refer the case as appropriate to the DBS, to children's social services and to the Local Authority Designated Officer where there are concerns that that a member of staff may be abusing a child, and/or to the Police where there is a concern that a crime may have been committed.

The Director of Safeguarding will be advised of all child protection cases to support risk assessments. All cases, including those not substantiated, will be discussed to inform lessons learned and improvements to policy, code of practice and training.

## **b. Record keeping**

As well as keeping records of concerns, discussions and decisions, designated safeguarding leads should keep records of the rationale for any decisions made and these should be available for review by the Director of Safeguarding.

## **c. Data protection understanding**

The Data Protection Act and UK General Data Protection Regulation (UK GDPR) supports the sharing of relevant information for the purposes of keeping children safe. Concerns about sharing information must not be allowed to stand in the way of safeguarding and promoting the welfare of children and sharing information on a need-to-know basis.

All personal and sensitive data will be collected, processed and stored securely and confidentially in accordance with the Data Protection Act (DPA) and the General Data Protection Regulation (GDPR) - and any other applicable legislation which may follow) as well as Imperial College's [Data Protection policy](#).

## **d. Confidentiality**

It is important to restrict sharing of information of safeguarding concerns to those who are directly involved in providing support and resolution. Confidential and sensitive information should not be shared with other parents, participants, or wider University staff.

Further guidance of confidentiality and consent is contained in the e-learning training.

## **15. LINKED POLICIES AND GUIDANCE**

The following policies and guidance are included for reference in line with Imperial College's wider duty of care beyond children and adults at risk. Any question about the appropriate policy or procedure to be used may be raised with the Director of Safeguarding. ([l.lindsay@imperial.ac.uk](mailto:l.lindsay@imperial.ac.uk)).

### **Harassment and Bullying Procedures**

[Harassment and bullying](#)

### **Linked Guidance**

[Personal relationships](#)

[Alcohol and substance misuse](#)

[Prevent](#)

### **Raising Concerns**

[Referral of Concerns](#)

[Public interest disclosures](#)

## **Mental health and wellbeing**

[Student Mental Health Code of Practice and Guidelines](#)

[Health and Wellbeing](#)

Author: Director of Safeguarding

Approved by the University Management Board Risk and Compliance Committee  
February 2025

Next review January 2026