

**IMPERIAL COLLEGE LONDON**  
**CHILD PROTECTION AND ADULTS AT RISK SAFEGUARDING POLICY**

**INTRODUCTION:**

**Safeguarding involves taking steps to protect people (especially children and adults at risk) from harm and responding appropriately when required.**

**This policy applies to:**

1. **Staff**: The term “staff” will be used to describe those people employed on a contract of employment (fixed term or open ended) at the University, as well as those working on consultancy agreements as contractors and on a voluntary and/or unpaid basis.
2. **“Students”<sup>1</sup>**: The term “student” will be used to describe any undergraduate or postgraduate student registered with the University.
3. **All organisations and agencies** who have functions relating to children on the University premises.

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

4. **“Child” or “Children”**: The statutory guidance “Working Together to Safeguard Children”<sup>2</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.
5. **“Child safeguarding”** is a proactive approach that aims to prevent harm and promote the welfare of all children as soon as problems emerge. This includes protecting children from maltreatment, whether that is within or outside the home, and includes activity that is in person or online. It covers mental and physical health or development with the purpose of ensuring that all children grow up in circumstances consistent with the provision of safe and effective care and are supported to achieve the best outcomes.
6. **“Child protection”** is the specific term covering cases where a child is at risk or experiencing significant harm and the reactive measures to protect them.
7. **“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 himself or herself against the abuse or neglect or the risk of it.<sup>3</sup>

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<sup>1</sup> [London safeguarding children procedures](#)

<sup>2</sup> [Working together to safeguard children & Keeping children safe in education](#)

<sup>3</sup> [Care Act 2014](#)

8. “**Adult safeguarding**” requires people and organisations to work together to prevent the experience and risks of abuse or neglect. It covers ensuring that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs when deciding on any action.
9. In a Higher Education context, the term ‘safeguarding’ may also be used more broadly to refer to a general duty of care to members of our community and the communities in which we work to deliver education and to carry out research. Imperial College recognises and accepts these responsibilities and seeks to safeguard the welfare of all that attend, visit or engage with Imperial College. The University prioritises student and staff welfare and will take proactive and appropriate steps to ensure that its responsibilities are met. Our safeguarding information and guidance will be applied, in an integrated way, to support all those who may be vulnerable. Supporting policies, including those covering bullying and harassment, are listed in the associated Code of Practice.

#### **Other statutory responsibilities:**

10. The University has a specific responsibility to **protect children and adults from harm and abuse**, neglect and exploitation including physical injury, sexual abuse and emotional abuse. Abuse can include domestic abuse, for example children witnessing the ill-treatment of others. People working in education settings play an important role in building relationships, identifying concerns and providing direct support to children. They may be the first trusted adult to whom children report safeguarding concerns.<sup>4</sup>
11. **The University has a duty to support** vulnerable individuals who may be at risk of radicalisation or of being drawn into terrorism by an extreme cause, movement or ideology. This is known as the ‘**Prevent duty**’<sup>5</sup>. The University approaches this as part of its wider responsibility to the welfare of its students, staff and visitors.
12. The University also has a duty to **make services accessible**<sup>6</sup>. There is a responsibility on public authorities to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between people who have protected characteristics and those who do not. Universities must assess and, where appropriate, put in place measures ahead of time to support all children and those accessing services, overcoming any barriers they may face due to a particular protected characteristic.

#### **It is University procedure to:**

13. To always request a Disclosure and Barring Service (DBS) check (see the Code of Practice) for those staff and students who undertake regulated activity, and to consider obtaining a DBS check in other circumstances where the University is

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<sup>4</sup> [Keeping children safe in education & Early years foundation stage \(EYFS\) statutory framework](#)

<sup>5</sup> [Counter-Terrorism and Security Act \(CTSA\) 2015](#)

<sup>6</sup> [Equality Act 2010](#)

legally entitled to do so. This requirement also applies to overseas workers.<sup>7</sup>

14. To require all staff and students to disclose any unspent criminal convictions and to require all staff and students (including those who do not work directly with children or adults at risk) to immediately notify their Head of Department of any circumstances that may impact on their suitability to work alongside children or adults at risk, including but not limited to any arrest or charge for a sexual offence of any kind (regardless of whether it relates to children and/or adults at risk) or for an offence relating to any other form of misconduct involving children or adults at risk. Where a staff or student member has disclosed relevant information, or the University becomes aware, the University will undertake an evaluation and a risk-based assessment that is both proportionate and relevant to the work or programme of study. The requirement to notify the University of any current criminal conviction or circumstance impacting suitability will also apply to workers engaged by external commercial partnerships using Imperial College premises.
15. To require ethical reviews and risk assessments to be undertaken for all activity involving children or adults at risk, including overseas fieldwork, and to ensure appropriate reporting strategies are in place to recognise, respond and report concerns.<sup>8</sup>
16. To ensure appropriate safeguards and risk assessments are in place for commercial contracts where children and/or vulnerable groups are using University facilities.
17. To ensure that staff and students who have unsupervised or regular access to children and/or vulnerable groups have access to appropriate guidance and complete appropriate training.
18. To require members of staff who have any concerns regarding the welfare of a child or vulnerable person to report their concerns to their local safeguarding officer.<sup>9</sup> This requirement applies to concerns that arise both within the University or elsewhere. The Local Safeguarding Officer will liaise with the appropriate Lead Safeguarding Officer. The University will adopt an integrated approach to safeguarding working with multi-agency support as appropriate.

#### **Mandatory training:**

19. All staff will be required to undertake training to learn how to recognise, respond and report safeguarding concerns. This training will include information to raise awareness:
  - That safeguarding issues can arise in any organisation – it can happen here;
  - That there is a duty to prioritise safeguarding issues;
  - Of the importance of early intervention, integrated and coordinated help from within the organisation and externally;
  - On how to report and share information related to safeguarding concerns including low level concerns.

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<sup>7</sup> This Policy and associated Code of Practice should be read in conjunction with the Human Resources Guidance Note – [Disclosure and Barring Service Checks - Guidelines for Line Managers](#).

<sup>8</sup> The process for review and approval of risk assessments is available [Risk Assessment Guidance](#)

<sup>9</sup> [Contacts for further support](#)

**The associated code of practice:**

20. This policy should be read alongside the safeguarding code of practice. The code of practice contains more detailed <sup>10</sup>information and guidance including requirements for safer recruitment, in person and online safeguarding, arrangements for investigating complaints and the integration of data protection and confidentiality requirements with safeguarding practice.
21. All staff must familiarise themselves with the contents of the code of practice which is reviewed annually and updated in line with changes to statutory legislation and practice guidance.

**Governance:**

22. The University Management Board's Risk and Compliance Committee has delegated governance oversight for safeguarding and has agreed this Policy and the associated Code of Practice.
23. The Director of Safeguarding<sup>11</sup> is the University's Child Protection Officer and Designated Accountable Officer for Ofsted. This role has responsibility for the day-to-day implementation of the policy and code of practice and reviews of case management for safeguarding prevention and reporting for under 18s.
24. The Imperial College Safeguarding Network<sup>12</sup> will provide advice to ensure an integrated approach to safeguarding of children and vulnerable adults at risk across the University.

**Dissemination:**

25. This Policy and the associated Code of Practice will be available for reference on the Human Resources Division web pages. Copies will be made available to all Imperial College subsidiaries to which the Policy and associated Code of Practice will also apply. Parents/guardians of children, schools, external clients and contractors involved in activities related to the University will be made aware of this Policy and the associated Code of Practice and required to follow the requirements whilst using University facilities and services.

**Review:**

26. The operation of the Policy and associated Code of Practice will be reviewed annually by Imperial College's Safeguarding Network. An annual report will be provided to the University Management Board's Risk and Compliance Committee and the Council's Audit and Risk Committee.

**Author: Director of Safeguarding**

**Revised version approved by the Risk and Compliance Committee February 2025**

**Next review date: January 2026**

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<sup>10</sup> [Code of Practice](#)

<sup>11</sup> Director of Safeguarding - Louise Lindsay - [L.lindsay@imperial.ac.uk](mailto:L.lindsay@imperial.ac.uk)

<sup>12</sup> [Safeguarding Network Membership](#) & [Safeguarding terms of reference](#)