

## IMPERIAL COLLEGE LONDON

### **CHILD PROTECTION AND ADULTS AT RISK SAFEGUARDING POLICY**

#### **INTRODUCTION**

1. Safeguarding involves taking steps to protect people (especially adults 'at risk' and children) from harm and responding appropriately when required.
2. The Safeguarding Vulnerable Groups Act 2006 defines a "child" as a person under the age of 18. For the purpose of this Policy and associated Code of Practice, the terms "child" and "children" will be used to describe all children and young people under the age of 18 years participating in College-led activities.
3. The College has a specific responsibility to protect children who are involved in College activities from harm and abuse including neglect, physical injury, sexual abuse and emotional abuse. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger. The College recognises and accepts this responsibility and seeks to safeguard the welfare of all children that attend or visit it or engage with College staff or students on a professional basis, by taking appropriate steps to ensure that its responsibility is met. All College staff should be aware of safeguarding issues that can put children at risk of harm.
4. The Care Act 2014 provides that safeguarding duties apply to an adult who (a) has needs for care and support (b) is experiencing, or is at risk of, abuse or neglect, and (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. Statutory guidance sets out that adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.
5. In a Higher Education context, safeguarding also refers to an enhanced duty of care to safeguard members of our community and the communities where we work to deliver education and to carry out research. The College prioritises student and staff welfare. Our safeguarding information and guidance will be applied, in an integrated way, to support those who may be vulnerable.
6. For the purpose of this Policy and associated Code of Practice, the term "staff" will be used to describe those people employed on a contract of employment at the College, as well as those working on consultancy agreements, as contractors and on a voluntary and/ or unpaid basis. The term "student" will be used to describe any undergraduate or postgraduate student registered with the College.

#### **POLICY**

7. To fulfil its safeguarding obligations, it is College Policy:
  - a. 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 will consider obtaining a DBS check in other circumstances where the College is legally entitled to do so. This requirement also applies to overseas workers.
  - b. To require staff to notify the Head of Department of any current criminal conviction. (See [Core Terms and Conditions](#)). The requirement to notify the College of any current criminal conviction will also apply to workers engaged by external commercial partnerships on College sites.
  - c. To require ethical reviews and risk assessments to be undertaken for all activity involving children or adults at risk, including overseas fieldwork, to account for the possibility of

sustained contact with children and/or vulnerable groups and to ensure appropriate reporting strategies are in place. The process for review and approval of risk assessments is available on the College Safeguarding webpages.

d. To ensure that staff and students who have unsupervised or regular access to children and/or vulnerable groups have access to appropriate guidance and training.

e. To ensure appropriate safeguards and risk assessments are in place for commercial contracts where children and/or vulnerable groups are using College facilities.

8. A member of staff who has any concerns regarding the welfare of a child or vulnerable adult who is involved in College activities **must** report their concerns to their local safeguarding officer as an individual set out in the referrals flowchart – see the College safeguarding webpages. The Local Safeguarding Officer will liaise with the appropriate Lead Safeguarding Officer.

9. The Lead Safeguarding Officer will guide on appropriate action and may refer the case as appropriate to the DBS, to children's social services where s/he has concluded that someone may have caused harm or abuse or poses a risk of harm or abuse to a child, 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.

10. If appropriate, the Director of Safeguarding and College Projects will refer a case for any relevant action, such as suspension or commencing disciplinary proceedings, if such action has been approved by the Police and/or the Local Authority Designated Officer, where such external agencies are involved.

11. The College will make a referral to the DBS when a member of staff is dismissed or leaves following safeguarding allegations and where the DBS harm criteria is met.

12. The Provost's Board has agreed this Policy and associated Code of Practice. The Director of Safeguarding and College Projects will have responsibility for the day to day implementation with direction from the College's Safeguarding Committee. See the College safeguarding webpages for the Safeguarding Committee's membership and terms of reference.

## **MONITORING**

13. The Director of Safeguarding and College Projects will have overall oversight of cases that are referred under this Policy. There will be an ongoing review of the implications of any cause for concern arising under this Policy and associated Code of Practice and whether, as a result, it might be necessary to take further action itself or to review or amend its Policy, Code of Practice and procedures.

## **DISSEMINATION OF THE POLICY**

14. This Policy and associated Code of Practice will be available for reference on the College's Central Secretariat and Human Resources web pages.

15. Copies will be made available to all College subsidiaries to which the Policy and associated Code of Practice will also apply.

16. Parents/guardians of children, schools, external clients and contractors involved in activities related to the College will be made aware of this Policy and associated Code of Practice.

## **REVIEW**

17. The operation of the Policy and associated Code of Practice will be reviewed annually by the College's Safeguarding Committee. An annual report will be provided to the Provost's Board.

18. 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](#)

19. All personal and sensitive data will be collected, processed and stored securely and confidentially in accordance with the [Data Protection Act \(DPA\) 1998](#) and, from 25 May 2018, the General Data Protection Regulation (GDPR) - and any other applicable legislation which may follow) as well as the College's [Data Protection policy](#).

Approved by the College's Safeguarding Committee March 2018

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