Safeguarding Committee 2021 Annual Report to Provost’s Board

Prepared by the Director of Safeguarding

1. Overview

This report provides Provost’s Board with a summary of actions and initiatives undertaken by the Safeguarding Committee in the last year. It reports on progress for the priorities that were identified in the 2020 Annual Report including those informed by the KPMG audit of safeguarding practices provided to the Provost’s Board in 2020.

The report has been prepared by the Director of Safeguarding in consultation with the members of the Committee (full membership listed in Appendix 1). Proposed areas of focus for 2022 are noted for Provost’s Board comment and endorsement as highlighted in the commentary below.

2. The Safeguarding Committee

The formation of the Safeguarding Committee in 2018 reflects the wide scope of activities involving children across College, for example public engagement, outreach and commercial events, work experience and enrolled students under the age of 18. The Committee also includes membership from roles dealing with vulnerable adults at risk. There are now more than 50 members of staff who attend the Committee representing the wide spread of activity across College.

The Committee meets on a termly basis to:

1. Agree protocols and procedures that reflect a best practice approach to safeguarding
2. Ensure clear accountability and training for those with responsibility for safeguarding
3. Share learning and casework developments to improve awareness and compliance

The Safeguarding Committee’s focus is on the College’s statutory responsibilities for those under age 18 and adults at risk. However, the Safeguarding Policy, Code of Practice and safeguarding webpages also include information on the wider support available for staff and students’ health, safety and wellbeing. We have seen an increase in the enquiries from research funders requiring evidence of the College’s integrated approach to safeguarding beyond the statutory definition. In line with this wider approach, Safeguarding Committee meetings during the year have included presentations on preventing and addressing harassment and sexual misconduct, the management of complex student welfare cases, the response of schools to the ‘Everyone’s Invited’ campaign and safeguarding support for transgender children.

Safeguarding Committee members have undertaken the essential safeguarding online course and receive termly briefings from a member of the Safeguarding Unit at Farrer & Co. A CPD training afternoon took place in the autumn term. There were 42 attendees from the Safeguarding Committee with presentations from a mix of internal and external speakers. Topics covered included online abuse/cyber bullying, online platforms and extremist content, and culture and diversity in a safeguarding context.

The CPD training was well received and is proposed to become an annual event, open to both Committee members and other interested members of College.

3. Policies, Procedures, Information and Training

As noted as a priority in last year’s report, during the course of 2021 The College safeguarding webpage was reviewed and updated to provide better signposting to key information including disclosure and barring requirements and how to report concerns. There is Covid specific guidance
on the webpages including information on risk assessments for on-line activity. Information has also been made available on photography and image sharing following updated guidance from the NSPCC.

The webpage includes a referral flow chart with the names of local and lead safeguarding officers – all of whom are members of the Safeguarding Committee. We have not been able to secure research representatives from each Faculty so Lynne Cox, Director of Research Office, and Cindy Lai, Head of Research Support Services, have agreed to be the point contacts for research related issues and the referral flowchart will be updated accordingly.

The Safeguarding e-learning course is part of the Essentials suite of mandatory courses. Feedback on the course was generally high but some staff reported spending longer than expected on quiz completion and content. The material was therefore refreshed in February 2022 to improve visibility of the core content covered by the quiz. Responses will continue to be monitored and material refreshed at least annually to incorporate new legislation and guidance on practice.

The Safeguarding Committee have undertaken an annual review of the Safeguarding Policy and the Code of Practice. Updates are included at Appendix 2 and 3 (clean and tracked). The changes are mostly minor clarifications with additional information confirming the College’s integrated approach to safeguarding in line with research funder expectations. There is also a specific recommendation for a change in terms and condition to cover a requirement for notification of any police investigations related to safeguarding – the reason for this request is noted in section 4b – Criminal convictions and police investigations below.

Provost’s Board are requested to review and agree the changes to the policy documents.

4.a Disclosure and Barring Checks

The Staff Compliance team became responsible for staff DBS checks in 2020, supported by Mayflower, a third-party supplier offering online checks. This revised arrangement has improved turnaround times significantly and the efficiency and quality of checks.

As noted in last year’s report, a priority for the team was data cleansing and to work with departments to ensure appropriate checks were in place. Over the past 12 months, streamlined internal processes have been created to handle the high increases in volume of DBS applications (circa 820) and to ensure that all required DBS checks are followed up with applicants and referred to departments where applications are not made.

A new process has been put in place to identify and advise departments when overseas criminal records checks should be carried out for new staff. New eligibility guidance and forms have been developed to support managers in determining DBS eligibility and levels. Improved processes have been implemented for the regular annual DBS exercises carried out with departments, e.g. Wardens and under 18s exercises. A College wide DBS review has been undertaken to ensure that all those who require statutory DBS checks have them in place.

The Staff Compliance team are also responsible for staff immigration and staff HESA returns. The demand on this team has increased due to several external factors and the ongoing volume is unsustainable. This is likely to impact on the ability to undertake checks and provide guidance in the recommended turnaround times. Funding for additional resources is currently under consideration via the HR Planning round.
Subject to enough fully trained staff resources, priorities for the next 12 months will be to complete the College wide review for a few outstanding Faculty of Medicine departments and to introduce a programme of quarterly reviews with departments, to ensure all required DBS checks are in place on an ongoing basis. Additional compliance and service development activities, including process improvement, further development of guidance and training with departments, will be undertaken should resources permit.

4.b. Criminal convictions and police investigations

The Director of Safeguarding reviews all DBS certificates that include information on criminal convictions and police advisory notes. In conjunction with the line manager, there is a risk assessment to confirm any issues with ongoing employment or measures that need to be put in place. During this process a potential safeguarding gap was identified in the College’s terms and condition. These state:

Staff are required to notify the Head of Department/Division of any current criminal conviction. Staff are not required to notify spent convictions unless they are in professions or occupations which, under the Rehabilitation of Offenders Act (1974), are designated as posts where both current and spent convictions should be notified. Information on convictions occurring during employment will not be used for disciplinary purposes unless it impacts on the role and responsibilities of the post which the member of staff holds.

There is currently no contractual requirement to notify the College of an arrest or ongoing police investigation for a safeguarding offence prior to prosecution. As police investigation processes can be prolonged, the College community may be at risk as we are unable to mitigate contact with young people during the police process. We have sought legal advice, discussed with HR and propose to expand the contractual position as follows:

Staff are required to notify their Head of Department/Division of any criminal conviction or conditional caution unspent at the point of, or received during, employment without delay. Staff are not required to notify spent convictions or cautions unless they are in professions or occupations which, under the Rehabilitation of Offenders Act 1974, are designated as posts where both current and spent convictions and cautions should be notified.

The College reserves the right to request that a member of staff makes an application to the DBS for a basic check and/or any other vetting or criminal records check which their role may from time to time be eligible for.

The College’s activities include education and learning involving both children and adults at risk (as defined in the College’s Safeguarding Policy), as well as other students who might be vulnerable. The College also operates childcare and outreach and public engagement programmes. For this reason, all staff (including those who do not work directly with children or adults at risk) are required immediately to notify their Head of Department/Division 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. Information disclosed to the College in accordance with this paragraph will be used to undertake a risk assessment and to consider appropriate and proportionate measures that should be put in place to safeguard and protect from harm people who come into contact with the College during any criminal investigation and prosecution process.
Information on arrests, charges, cautions or convictions for criminal offences will not normally in itself be reason for disciplinary action unless it affects the member of staff’s suitability to do their job or their relationship with the College, work colleagues, students or other third parties with whom the member of staff engages in the course of performing their job.

A failure to disclose information in accordance with this section may be treated as a disciplinary matter and could lead to summary dismissal.

The Safeguarding Committee recommend that this expanded contractual requirement applies to existing staff as well as new staff. Subject to Provost’s Board agreement, the practical aspects of implementation will be progressed with HR/Trades Unions and the Data Protection Officer. It is likely that the issue will also be considered in the review of Student Disciplinary procedures.

**Provost’s Board are asked to agree to this recommended variation of staff terms.**

5. Risk Assessments

The KPMG audit in 2020 highlighted that risk assessments are required to be in place where activity is being undertaken with children and vulnerable adults to record the actions that are required to manage the associated risks. The audit noted that whilst those departments regularly having contact with children incorporated safeguarding considerations within their assessments, this may not be considered by other departments that do this activity less frequently. The audit recommended that guidance should be developed on when a safeguarding risk assessment is required. There should also be monitoring undertaken on a spot check basis to confirm whether appropriate risk assessments are in place.

The Safeguarding Committee reviewed this recommendation at its meeting in September 2020. Members agreed that risk assessments were a fundamental requirement and should be mandated for all activities for children and adults at risk. It was recognised that practice in this area was patchy and would need to be developed in the 20/21 academic year. Provost’s Board endorsed this recommendation last year and Heads of Departments were contacted and provided with information on the requirement for risk assessments in April 2021.

Representatives from the Outreach Department supported the development of risk assessments for activities involving those under age 18. A template risk assessment was prepared, and a process put in place for a review by a sub-group of the Outreach Health and Safety Committee to share specialist safeguarding expertise across College. This guidance and process is published on the Safeguarding webpages. The Outreach guidance has been particularly welcomed and utilised by colleagues in external partnerships and public engagement. In other areas ad hoc queries have been received rather than draft risk assessments. There have been no requests for input into risk assessments from research practitioners.

6. Case Management

The KPMG audit noted that the College should have a process in place for the monitoring of referrals or concerns raised relating to safeguarding. This process is required to verify that issues have been appropriately reviewed, closed and any required lessons learned. Although the Director of Safeguarding performs checks on a periodic basis in higher risk areas, this does not provide coverage to the full range of safeguarding concerns that may be identified. In response, it was agreed that the Director of Safeguarding and the Director of Student Services (as the lead safeguarding officer for students) would hold a central register of safeguarding referrals and concerns across both staff and students.
Case management systems continue to be explored with ICT to ensure there is an integrated and secure repository for this highly sensitive information and the ability to track and coordinate low level concerns being dealt with across College. During the year the Safeguarding Committee reiterated the need for a student case management system with the following statement:

“The Safeguarding Committee considers it a high priority to be able to capture safeguarding observations across the student body to ensure a joined-up approach and visibility of issues across departments. There have been tragic consequences where this has not happened in other organisations. The Safeguarding Committee therefore strongly endorses the development of a Student Case Management system”.

Pending a robust systems solution, each lead safeguarding officer retains their own repository of information for their area of responsibility and the Director of Safeguarding meets with the leads, at least termly, for a case discussion to discuss lessons learned from any incidents and to identify trends and issues that will then inform training, procedure and policy adjustments at College level. This information is summarised and be provided to the Safeguarding Committee on a termly basis.

As a priority for 2022, the Academic Registrar will be the Safeguarding Committee’s representative on the ICT Product Line for students to develop a case management system. The Director of Safeguarding will also develop a safeguarding referral form for the website for case referrals which will complement the ‘report and support’ option already available.

7. Safeguarding Committee – sub groups

In 2021, regular sub-committee meetings were established between the Director of Safeguarding and small groups to focus on areas of interest or concern. Shared learning outcomes are then reported back to the Safeguarding Committee. The sub-committee groups are Outreach, Public Engagement, External Partnerships, Education, Early Years, Imperial College Union and Research.

The group meetings with Early Years and Outreach have tended to focus on case issues and learning. Outreach have supported risk assessments outside their own department and this has been much appreciated. During 2022, we will monitor the extent to which departments ensure full risk assessments are in place when they engage third parties to deliver outreach activities.

Meetings with Public Engagement, External Partnerships and Imperial College Union tended to focus on improvements to contracts, protocols, policies and procedures. The Director of Safeguarding is now an agreed and documented escalation point for activity undertaken by these teams and will be involved in lessons learned from six monthly reviews with regular commercial partners. An identified area for discussion in the coming year is the protocols for volunteers who are working with vulnerable adults and further guidance will be produced on good practice when personal relationships/friendships develop during the work.

The discussion in the subgroup for Education has considered gaps in supporting information for activities. This has led to improved guidance on remote interviews including clarification on retention of records for video submissions by under 18s. The subgroup identified that there is a need for further guidance to Heads of Department on the application of their discretion in the policy for students’ bringing children onto campus/into lectures and this will be reviewed during the coming year.

The subgroup will also consider, with the Admissions team, the introduction of a standard template for a full risk assessment across all activities for proposed new students aged under 16 at registration (any admissions policy changes (if necessary) will be submitted to QAEC in time for
2023 entry decisions). The Director of Safeguarding will also develop guidance on the transition of safeguarding records from schools to the university.

During the year the Director of Safeguarding met with Faculty research committees to introduce safeguarding in research considerations and to signpost the information and support available. The research misconduct ordinance has been updated to clarify the appropriate forum for investigation and review of safeguarding complaints related to research work. The Director of Safeguarding meets regularly with the Research Office and contributes to updates of the research protocols, questionnaires and ethics risk checklists as part of due diligence processes.

We have seen increased engagement from funders in this area and have responded to audits from UKRI and requests for information for grant proposals with NIHR. Feedback from these requests have informed the update of the Safeguarding policy (see para 3 above and Appendix 2). In the coming year, in response to feedback from these audits, we will also review guidance to ensure there is clear signposting to behavioural expectations for staff whilst on fieldwork assignments and develop the Safeguarding Internationally for all research as it is seen as a good resource and clarified responsibilities towards adults and children (regardless of whether they were working directly with them).

8. Conclusion:

The purpose of this annual report has been to provide Provost’s Board with a summary of the range of safeguarding issues under consideration by the Safeguarding Committee and the priorities for the coming year.

Provost’s Board is requested to:

- Note the information provided in this annual report from the Safeguarding Committee;
- Approve the proposed amendments to the Safeguarding Policy and Code of Practice;
- Approve the proposed variation to core terms and conditions to require notification of arrests relating to safeguarding offences;
- Consider, comment and agree the 2022 priorities and activities noted by the Safeguarding Committee (highlighted in text above).

Louise Lindsay

Director of Safeguarding

14.3.22 amended following SG Cttee
Appendix 1  Safeguarding Committee Membership

Louise Lindsay  Director of Safeguarding  (Chair)
Pippa Chalmers  Head of Staff Compliance
Alice Kendle  Farrer & Co Safeguarding Unit representative
Suzanne Woodcock  Staff DBS Manager
Caroline Cooling  Staff Compliance Assistant  (Notes)

HR and Faculty representatives
Shola Alabi  Strategic HR Partner (Academic Services & HQ)
Benita Cox  Business School
Lorraine Craig  Engineering
Chris Harris  Engineering
Richard Johnson  Business School
Kani Kamara  Head of EDI
Angela Kehoe  Strategic HR Partner (FoNS)
Ann Kelly  Head of Employee Relations
Claire O’Brien  Director of Occupational Health
John Seddon  Natural Sciences
Vahid Shahrezaei  Natural Sciences
Jeffrey Vernon  Medicine
Chris Watkins  Medicine

Student services
David Ashton  Academic Registrar
Hannah Bannister  Director of Student Services
Lizzie Burrows  Director of Marketing, Recruitment and Admissions
Claire Fox  Head of Student Counselling and Mental Health Advice
Maureen O’Brien  Head of Disability Advisory Services
Debra Ogden  Deputy Director of Student Services
Students’ Union
Thomas Flynn  Managing Director

Early Years
Liz-Anne Des Vignes  Early Years Deputy Manager
Tracy Halsey  Head of Early Years

Campus and Estate Services
Terry Branch  Head of Security
William Hollyer  Head of Sport
Sue Mannion  Student Hub Manager
Jane Neary  Director of Campus Services
Paul Noke  Head of Residential Services
Nick Roalfe  Director of Estates Operations

Outreach
Annalisa Alexander  Head of Outreach
Melanie Bottrill  Deputy Head of Outreach
Andrew Tebbutt  Director of Outreach

External and Commercial Partnerships
Claire Arup  Global Summer School Manager
Zara Davidian  Office of Financial Strategy
Marzena Esposito  Commercial partnerships
Marina Jagg  Commercial partnerships
Ian Johnson  Venue and Operations Manager
Lucy Spasova-Joneja  Business Development
Kim Vieira-Martins  Conferencing and events
Clare Whelan  Global Summer School Manager
Rachel Williams  Office of Financial Strategy
Public and Community Engagement

Vicky Brightman  Public Engagement Manager
Farial Missi    Community Engagement Manager
Lara Mistry    Public Engagement Manager
Tom Pearson    Academic Partnerships

Events

Jo Dyson    Head of Institutional Events
Susie Goss    Head of Institutional Events
Zoe Punaks    Advancement Operations

Research Services

Cindy Lai    Head of Research Support Services

Communications and HQ

Jesse Alter    Digital Content and Social Media Manager
Riccardo Feasey    Central Secretariat
Surrinder Johal    Director of Safety