

# **IMPERIAL COLLEGE LONDON**

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

### **INTRODUCTION AND DEFINITIONS**

1. Safeguarding involves taking steps to protect people (especially children and adults at risk) from harm and responding appropriately when required.
2. For the purpose of this Policy and associated Code of Practice, the following definitions will apply:
  - a. “Child” or “Children”: The statutory guidance Working Together to Safeguard Children (“Working Together”) 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.
  - b. “Adults at risk”: 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. The term “adults at risk” will be used to describe adults who meet these criteria.
  - c. “Staff”: The term “staff” will be used to describe those people employed on a contract of employment at the University, as well as those working on consultancy agreements as contractors and on a voluntary and/or unpaid basis.
  - d. “Student”: The term “student” will be used to describe any undergraduate or postgraduate student registered with the University.

### **GENERAL PRINCIPLES**

3. Working Together to Safeguard Children defines safeguarding and promoting the welfare of children as:
  - protecting children from maltreatment
  - preventing impairment of children’s mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes
4. The University has a specific responsibility to protect children from harm and abuse including neglect, physical injury, sexual abuse and emotional abuse. The University also has a duty to make services accessible. Imperial College recognises and accepts these responsibilities and seeks to safeguard the welfare of all children that attend, visit or engage with Imperial College. The University will take proactive and appropriate steps to ensure that its responsibilities are met. All Imperial staff should be aware of safeguarding issues that can put children at risk of harm.

5. The Care and Support statutory guidance sets out that adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It says that adult safeguarding is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

6. 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 where we work to deliver education and to carry out research. The University prioritises student and staff welfare and the prevention of harm. 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.

## POLICY

7. To fulfil its safeguarding obligations, it is Imperial 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 University 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 of Service \[PDF\]](#)). All staff (including those who do not work directly with children or adults at risk) are required immediately to 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. 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 on University 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 Imperial 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 University facilities.

8. A member of staff who has any concerns regarding the welfare of a child or vulnerable adult **must** report their concerns to their local safeguarding officer as an individual set out in the referral's flowchart – see Imperial College safeguarding webpages. 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.

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 they conclude 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. In all circumstances, the University will adopt an integrated approach to safeguarding working with multi-agency support as appropriate.

10. If appropriate, the Director of Safeguarding 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. Imperial 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 University Management Board has agreed this Policy and associated Code of Practice. The Director of Safeguarding will have responsibility for the day to day implementation with advice from Imperial College's Safeguarding Committee. See Imperial College safeguarding webpages for the Safeguarding Committee's membership and terms of reference.

## **MONITORING**

13. The Director of Safeguarding 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 Imperial College's Central Secretariat and Human Resources web pages.

15. Copies will be made available to all Imperial 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 University will be made aware of this Policy and associated Code of Practice and required to follow the requirements whilst using University facilities and services.

## **REVIEW**

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

provided to the University Management Board's Risk, Compliance and Ethics Committee and the Council's Audit and Risk Committee.

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, the General Data Protection Regulation (GDPR) - and any other applicable legislation which may follow) as well as Imperial College's [Data Protection policy](#).

Approved by the Imperial College's Safeguarding Committee and Provost's Board March 2018

Updated July 2020, November 2020, February 2022 and March 2023 (Provost's Board changed to University Management Board), March 2024