



Policy and Procedures for the Protection of Children and Adults in Need of Safeguarding

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1. College Policy Statement on Safeguarding

Child protection and the welfare of young people are very important to the College. Queen Mary, University of London, aims to provide a safe environment for children, young people and vulnerable adults to visit and participate in activities with us. We believe that individuals have a right to learn and develop within a safe environment.

Queen Mary expects that all staff, students and volunteers accept the fundamental principle and legal requirement that, in any given situation, the welfare of the child (any young person under the age of 18) or vulnerable adult is paramount¹.

We recognise our responsibility to develop awareness of safeguarding issues² and are committed to practice which reflects the College's duty of care and protects children and vulnerable adults from harm.

Queen Mary organises and participates in a wide range of activities that involve our staff and students working with young people and vulnerable adults both on and off our campuses and in the short and longer-term. These include but are not limited to:

- The College's Nursery;
- Visits by our staff and students carrying out paid or voluntary work with schools and colleges as part of our commitment to outreach activities;
- Visits to our campuses by young people for interviews, open days, taster days, revision classes, work experience;
- Provision of College residential accommodation as part of our summer school programmes;
- Staff and students who may interact with the vulnerable groups through their academic research ;
- Teaching enrolled/registered students who are under 18;
- Working with young people and vulnerable adults as part of our student volunteering activities in local community organisations;
- Students on placement (including medical and dental students) in workplaces arranged by the College where they will carry out "regulated activity";
- Staff working in College health centres or learning support units or roles who may work with vulnerable adults.

In all of our activities, the College is committed to safeguarding and promoting the welfare of young people and vulnerable adults as part of its common law duty of care and in response to specific legislation. We will take all reasonable measures to:

- Ensure that all have the opportunity to participate in College activities in a

¹ Children Act 1989

² The guidance and legislative framework that underpins this document includes *Working Together to Safeguard Children* (HM Government, 2006), *Safeguarding Children: Guidance for HEIs* (DIUS 2008), UN Convention on the Rights of the Child, Children Act 1989 and 2004, Sexual Offences Act 2003, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005.

safe and secure environment

- Take appropriate measures to identify and prevent anyone who is unsuitable to work with young people and vulnerable adults from doing so
- Ensure that any young person or vulnerable adult suffering from or who has suffered significant harm is identified and responded to appropriately and quickly
- Ensure that all concerns are taken seriously and responded to appropriately and quickly
- Work co-operatively with other agencies that provide safeguarding services for young people and vulnerable adults, and in partnership with parents and guardians where appropriate.

The policy and procedures adopted by the College have been informed by a wide range of documents including *Safeguarding Children: Guidance for English Higher Education Institutions* published by the Department for Innovation, Universities and Skills in December 2007, advice to the HEI sector from Universities UK and briefings including guidance from the Independent Safeguarding Authority and HM Government. They have been developed with support from the NSPCC's Consultancy Services. The College's approach to safeguarding is based on the principles recognised within UK and international legislation and government guidance. The following has been taken into consideration:

- Children Act 2004
- Children Act 1989
- Working Together to Safeguard Children (HM Government 2010)
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974
- UN Convention on the Rights of the Data Protection Act 1998
- Police Act 1997
- Criminal Justice and Court Services Act 2000
- Care Standards Act 2000
- Health and Social Care Act 2008
- Counter-Terrorism and Security Act 2015

2. Scope of policy

This guidance aims to ensure that all young people under 18, vulnerable adults, and all those who work with them, are safe and appropriately supported within our College and the activities we organise by minimising the risk of harm from discrimination, bullying, accidents, injury and abuse in all its forms.

Our aim is to protect all students and others using our facilities or engaged in College facilitated activities from harm regardless of age, gender, race, colour, nationality, ethnic or national origin, age, socio-economic background, disability, religious or political beliefs, trade union membership, family circumstances or sexual orientation.

The guidance applies to all College employees, students, freelance practitioners, Student Ambassadors, volunteers and anyone else representing the College. The guidance applies to any activity organised and/or delivered by Queen Mary, regardless of where the activity takes place.

Queen Mary has a duty of care to all visitors. External groups and organisations running activities for young people and/or those with additional vulnerabilities on our campuses are required to do so in accordance with approved risk assessments.

3. Values and Principles

The College

- recognises that the child's welfare is paramount;
- recognises that all young people, whatever their age, disability, faith, beliefs, gender, race or sexual orientation have the right to be protected from abuse;
- believes that all children and young people should be listened to and heard;
- believes that all children and young people should be valued and treated as individuals and respected for their individuality and identity;
- believes that all children and young people should be encouraged and praised;
- believes that all children and young people should be involved in decisions, whenever it is possible and appropriate;
- recognises that abuse can have serious long-term effects in terms of development, health and well-being including to self esteem and self image;
- will take all concerns and suspicions or allegations of abuse seriously and respond swiftly and appropriately;
- will share information about our safeguarding policy and good practice guidance with staff, students, volunteers, schools, partner organisations, parents and young people;
- will share concerns about the welfare of any child, young person or vulnerable student with the relevant agencies, involving parents and young people appropriately;

- will adopt and implement carefully the procedures for recruitment and selection of staff, students and volunteers who may be in contact with children or vulnerable people, including Disclosure and Barring Scheme (DBS) checks;
- will develop and implement appropriate procedures for responding to accidents, incidents, and alleged or suspected harm;
- will provide effective management for staff and volunteers through training, support and supervision;
- will identify a Lead Safeguarding Officer (the Director of Student Services) to oversee the framework for safeguarding and protecting children and vulnerable adults, Principal Safeguarding Officers and, where a need is identified, other designated officers at appropriate levels;
- will ensure that safeguarding officers undertake child protection training on an ongoing basis;
- will ensure that safeguarding officers are aware of the Government's Prevent strategy and will provide appropriate training and guidance;
- will establish a Safeguarding Steering Group to review policies and procedures on a regular basis and support effective implementation.

4. Implementation

Full copies of this document will be available and promoted to all staff, students, volunteers, student ambassadors, contracted freelance practitioners, partner organisations, parents and children taking part in University activities.

This guidance will be included with other University policies and procedures in induction and resource packs and on the University webpage. Relevant staff, students, Student Ambassadors and volunteers will be informed during recruitment and induction processes and will be provided with a level of training appropriate to the risks involved. The policy and other relevant safeguarding guidance will also be provided to external organisations hosting events at the University involving children or vulnerable people.

It should be noted that specialist departments such as Advice and Counselling will also have their own rigorous professional guidelines and codes of conduct to adhere to and that this document should be read in conjunction with other related College policies and guidance including:

- [Health & Safety](#) [Feb 2012]
- [Admission of Under 18s policy](#) [Jun 2015]
- [Accommodation policy for under 18s](#) [Viewed Dec 2015]
- [Equality Opportunities statement](#) [Jan 2011]
- [Dignity at Work policy](#) [revised Nov 2010]

- [Data protection policy](#) [June 2015]
- [Public Interest Disclosure Procedure](#) [July 2014]
- [Discipline Code of Practice](#) [Sept 2005]
- [Recruitment and Selection](#) [Guides dated 2014]
- [Children on campus](#) [Dec 2014]
- [QMSU Safeguarding Children Policy and Procedures](#) [Jan 2015]
- [QMSU Safeguarding Adults At Risk Policy and Procedures](#) [Jan 2015]

Issues arising from the operation of this policy should be directed in the first instance to the Director of Student Services, who is the Lead Safeguarding Officer for the College.

All line managers are responsible for monitoring that relevant staff members in their department are made aware of and follow the Children and Vulnerable Adult Protection guidance and procedures, as appropriate to individual job roles.

It is mandatory for all College staff and those contributing to its activities to comply with this Safeguarding Policy and to promote the welfare of children and vulnerable adults. Failure to follow this guidance and procedures would constitute a matter of concern for the College and may lead to disciplinary action. Anybody reporting a concern in good faith and in the genuine belief that there are concerns relating to safeguarding will be supported to do so even in the event of that concern subsequently being found to be unsubstantiated.

If members of staff, students, student ambassadors or volunteers are concerned that another member of staff, student ambassador or volunteer is not following the guidance and procedures, they should contact their own project coordinator or line manager, who will where necessary seek advice from the Principal Safeguarding Officer for their academic sector or the Principal Safeguarding Officer for Professional Services. Alternatively they can contact a Principal Safeguarding Officer directly. Where the project coordinator or line manager is the object of concern, then advice should always be sought from the Principal Safeguarding Officer or directly from the Lead Safeguarding Officer.

5. Disclosure and Barring Service

The Disclosure & Barring Service (DBS) helps organisations make safer recruitment decisions by providing access to criminal record information to assist employers identify candidates who may be unsuitable for certain work.

QMUL needs to be aware of all the spent and unspent criminal records of individuals who are appointed to positions considered exempt under the Rehabilitation of Offenders Act 1974.

Requests to the DBS for information about criminal convictions for both new and existing staff may only be made by HR staff who have been approved by the DBS as counter signatories.

See further information in the guidelines for the Disclosure and Barring Service:
<http://www.hr.gmul.ac.uk/procedures/recruit/dbs/index.html>

6. Safeguarding Vulnerable Groups Act 2006

England and Wales

The Safeguarding Vulnerable Groups Act 2006 established the Independent Safeguarding Authority (ISA) to make decisions about individuals who should be barred from working with children and to maintain a list of these individuals. The Protection of Freedoms Act 2012 merged the ISA with the Criminal Records Bureau (CRB) to form a single, new, non-departmental public body called the Disclosure and Barring Service (DBS).

Under the Safeguarding Vulnerable Groups Act 2006 it is an offence for an employer to knowingly employ someone in a regulated position if they are barred from doing so. It is also an offence for the individual who has been barred to apply for a regulated position (one which involves spending regular time working with children).

The Protection of Freedoms Act 2012 reduced the scope of "regulated activity" by focusing on whether the work is unsupervised (in which case it counts as "regulated activity") or supervised (in which case, organisations can request an enhanced criminal records check, but this will not include a check of the barred list). The new definition of regulated activity came into force on 10 September 2012 and was issued in conjunction with guidance on the level of supervision required to take work out of the scope of regulated activity.

The Safeguarding Vulnerable Groups Act 2006 also imposed the legal requirement on employers to refer to the ISA (now DBS) information about employees or volunteers who (may) have harmed children while working for them.

Extract taken from NSPCC Factsheet: Safer Recruitment May 2013

http://www.nspcc.org.uk/Inform/research/briefings/Safer-recruitment-legislation_wda95715.html

7. Safeguarding Children and Vulnerable Adults

The safeguarding policy and procedures developed by Queen Mary, University of London and the term “safeguarding” used throughout this document applies equally to the protection of children and vulnerable adults. Appendix D provides a glossary of definitions used in this document.

8. Organisational Safeguarding at Queen Mary

The College will take all reasonable measures to ensure that the risks of harm to the welfare of children and vulnerable adults are minimised.

8.1 Safeguarding Structure

The College has appointed existing staff to be Safeguarding Officers. The role of Lead Safeguarding Officer is supported by four Principal Safeguarding Officers. Those with these designated roles and responsibilities will be provided with specialist safeguarding training and continuing support to ensure that they are competent and confident to undertake these important roles. The duties of these posts are described in Appendix F.

8.2. Recruitment and Selection of staff

The College has published the following guidelines to assist recruiters with safeguarding element of their work:

- Recruitment and selection policy
- <http://www.hr.qmul.ac.uk/procedures/recruit/index.html>
- Disclosure and Barring Service: Guidelines for Departments
<http://www.hr.qmul.ac.uk/procedures/recruit/dbs/index.html>
- Policy Statement on the Recruitment of Ex-Offenders
- http://www.hr.qmul.ac.uk/docs/policies_procedures/recruitment/2549.doc

The selection and recruitment process for staff provides the College with an opportunity to detect and deter candidates for jobs who wish to harm young people and vulnerable adults and/or those candidates who do not have an aptitude for such work.

Whilst the DBS does not replace the need for enhanced checks which will still be necessary for some positions. All departments have a responsibility to apply robust recruitment procedures including, checking identity, qualifications, taking up references which indicate an individual’s suitability to work with young or vulnerable people, and enquiring into career history.

It is noted that students employed by the College are employees of Queen Mary. All Queen Mary students who are employed to work with young people and vulnerable adults will be subject to the provisions of the DBS.

8.3 Staff Code of Behaviour - Young People and Vulnerable Adults

Members of staff whose work brings them into contact with young people and vulnerable adults may be in a position or situation to harm or abuse them or behave inappropriately. The College has produced a written code of behaviour which sets out the College's expectations for staff (see Appendix H). Although it addresses the specific situation of children, its general principles and approach apply equally to the protection of vulnerable adults and it should be used by staff for this purpose. The Principal Safeguarding Officers will be able to provide advice and guidance to staff as required.

For certain of its activities, the College has additional codes of behaviour for participants other than staff (e.g. the behaviour towards each other of young people participating in a summer school based at the College's campus).

8.4 Training of College Staff

The College accepts that it is important to ensure that its staff are adequately trained to safeguard both the young people and vulnerable adults they work with and themselves.

The College will continue to identify the training needs of staff and requires departments to ensure that an appropriate level of training is provided. This may involve some or all of the following, depending upon the nature of the duties performed by the member of staff:

- Awareness Training
- Code of Behaviour/briefing
- Handling a disclosure from a young person/vulnerable adult
- Child Protection procedures and responding to concerns
- Safeguarding Officer training

8.5 College Nursery

The College's Day Nursery works within the legislative framework for safeguarding children required of all childcare providers. The Nursery's own safeguarding policy can be found in its policies and procedures statement. See <http://www.nursery.qmul.ac.uk/downloads/index.html>

8.6 Safeguarding responsibilities under the Prevent duty

In common with all UK universities, QMUL is required to engage with the Government's Prevent strategy and provide appropriate training and guidance for members of staff whose role involves safeguarding students. The Government describes the Prevent strategy as follows:

It aims to prevent people from being drawn into terrorism. It is a collaboration between local authorities, universities and other public bodies, the police and the local community, that sets out to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk, and develop the most appropriate support plan for the individuals concerned. Prevent is not a process for gathering intelligence; it is about early intervention to safeguard and divert people away from the risk they face before illegality occurs.

Many factors could suggest that an individual might be at risk of being drawn into terrorism. The presence of any one of these factors is not necessarily an indication that an individual is committed to terrorism, but it could suggest that an individual might benefit from support through the Prevent strategy. Examples from Government guidelines of relevant factors include:

- engagement with an extremist group, cause or ideology that seeks to justify the use of violence or other illegal means for the purpose of advancing a political, religious or ideological cause;
- polarisation from society or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Any behaviour which suggests that an individual might be at risk of being drawn into terrorism must be reported using the standard safeguarding procedure outlined in this Policy, so that the matter can be investigated and appropriate support can be put in place if needed. As with other types of safeguarding, the threshold for reporting is low, because Prevent is about early intervention to safeguard and divert people away from the risk they face.

9. Recognition of Concerns

9.1. Responsibilities

All concerns relating to a child's welfare, an individual's behaviour or allegations of abuse will be taken seriously and responded to proportionately and appropriately in the interests of all parties. The impact of becoming aware of concerns and responding to them is inevitably distressing for all concerned. It is important that all allegations are handled correctly and proper records are kept.

It is not the responsibility of any one working for Queen Mary, in a paid or voluntary capacity, to decide whether or not abuse is taking place. However, there is a legal and moral responsibility to act on concerns to protect children in order that the College and/or appropriate agencies can then make inquiries and take any necessary action to protect the child or vulnerable individual(s).

Allegations are not, however, the only form of disclosure. It may be the case that concerns arise when someone reports something said by a third party, a suspicious occurrence, or something they have overheard. Such information needs

to be reported and handled appropriately by the relevant Principal Safeguarding Officer, who will have received formal training in handling allegations and other disclosure information.

9.2. Causes for Concern

Any incidents which cause concern in respect of a child are required to be reported immediately to the relevant Principal Safeguarding Officer. Below are examples of incidents which are required to be reported.

When:

- a child or young person is accidentally hurt;
- there is a concern that a relationship is developing which may be an abuse of trust;
- you are worried that a child or young person is becoming attracted to you;
- you are worried that a child or young person is becoming attracted to a colleague who has regular contact with them;
- you think a child or young person has misunderstood or misinterpreted something you have done;
- you have been required to physically restrain a child or young person to prevent them from harming themselves or another or from causing significant damage to property;
- you receive a report from a child or young person alleging abuse regarding a staff member, volunteer or a member of an external organisation using the College's facilities;
- you see any suspicious marks on a child or young person;
- you observe behaviour which is concerning or which breaches the College Code of Behaviour;
- a child or young person shares concerns with you that might indicate that they are being groomed, harmed or are at risk of harm; and/or
- you hear of any allegations made by a child or young person of events outside Queen Mary.

9.3. Recognition of Abuse

The College's employees may not be familiar with working with children and may not be in a position to recognise abuse. If you are not familiar with working with children you can receive some basic knowledge by undertaking training provided by the College. This will allow you to be aware of the various types of abuse and also identify the different cultural contexts of behaviour.

It is not the place of Queen Mary employees or students to make a judgement about whether abuse has occurred. This is the remit of external agencies. Child abuse can occur within any setting and abusers may seek to use community and voluntary organisations to gain access to children and young person. There may be some indicative signs of abuse which include:

- unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- an injury for which there may be an inconsistent explanation either from an adult or child;
- the child or young person describes an abusive act or situation;
- unexplained changes in behaviour;
- inappropriate sexually explicit behaviour or sexual awareness
- a distrust of adults; and/or
- the child or young person is not allowed to be involved in normal social activities.

10. Responding to an Allegation

10.1. Receiving information about potential concerns/abuse

It is vital to recognise that the College can have a robust policy and procedural framework, including rigorous recruitment and selection processes but if the culture of our staff and College makes it impossible for people to talk about concerns and/or abuse or for young people to share concerns then this will have limited value.

Information from research shows that on average it takes a child seven attempts to disclose and be heard. If a young person says or indicates that he or she is being abused, or information is obtained which gives concern that a child is being abused, **the person receiving this information should:**

- React in a calm and considered way so as not to frighten or deter the child
- Believe what the child is telling them and show concern
- Tell the child he/she is not to blame for what has happened and that he/she was right to share this information
- Ensure the immediate safety of the child
- If the child needs immediate medical treatment, telephone Security and ask them to call for an ambulance, inform doctors of the concerns and make sure that they know that this is a safeguarding issue
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child who has speech disability and/or differences in language
- Keep any questions to the minimum required to clarify the concern and ensure a clear and accurate understanding of what has been said
- Do not ask leading questions or make suggestions about what may have happened
- Listen without interrupting if the child is recounting significant events
- Reassure the child that the problem can be dealt with
- In the event of suspicion of sexual abuse do not let the child shower or wash until given permission to do so by the police as washing can destroy valuable evidence
- Always follow the procedures outlined in the flowcharts in Appendix A
- Write down the details of the concern, incident and/or what the young person has disclosed as soon as possible and before leaving work. Include details of who this information has been shared with and when. The LSO/PSOs will provide support and ensure that the referral form (Appendix C) is completed

- Keep all original notes as they may be needed as evidence

A principal of least delay should always apply. Where appropriate (because of delays in the LSO or PSO being available or because of concerns about reporting internally for example) seek advice from Children's Social Care or Police who will advise on the action to be taken, including advice on contacting parents, Expert advice can also be provided by the NSPCC Helpline on 0808 800 5000.

The person receiving the information should NOT:

- Panic
- Allow any shock or distaste to show
- Make promises of confidentiality but explain that they will need to pass on this information to those who need to know
- Show disbelief or fail to take the allegations seriously
- Ask questions other than to clarify that they have enough information to act
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Approach the alleged abuser
- Make promises or agree to keep secrets
- Take sole responsibility
- Fail to take responsibility for reporting the concern

10.2. Recording Information

Information needs to be clearly recorded by the College Safeguarding Officers and may need to be referred out to the Local Authority Designated Officer, Children's Social Care or the Police.

- Accurate recording is essential, as there may be legal proceedings at a later date. Ideally, where the child has made a disclosure, a verbatim record of their account of what occurred in their own words should be recorded
- The record should include details of the nature of the allegation or concern and a description of any injury (you must not remove a child's clothing to inspect any injuries)
- Times, dates, places and any other detail should be included
- Referrals to Children's Social Care or Police should be confirmed in writing within 24 hours – if not, then at the earliest opportunity.
- Keep a record of the name and designation of the Children's Social Care member of staff or Police Officer to whom concerns were passed and record the time and date of the call in case any follow-up is needed.
- Ensure that all information is maintained safely in accordance with Data Protection legislation.
- Information should only be shared on a strictly "need to know" basis in the interests of protecting a child, young person or vulnerable adult.
- Where possible, the Principal Safeguarding Officer should use the referral form in Appendix C and send this to the Lead Safeguarding Officer who should be contacted as soon as possible after concerns have arisen or been recognised.

10.3. Reporting Concerns

Concerns, incidents or allegations relating to poor practice, bullying or abuse should always be referred as quickly as possible to the relevant College Principal Safeguarding Officer who will decide with the Lead Safeguarding Officer the 'route' a referral will subsequently take (e.g. managed internally or referred out to the statutory agencies).

All concerns relating to potential abuse should be referred externally as quickly as possible to ensure that those with the correct expertise undertake any subsequent investigation as this is NOT the responsibility of the College or its staff. It is the remit of the statutory agencies (Children's Social Care and/or the Police) and not anyone connected with the College to investigate allegations or suspicions of abuse as detailed in Section 47 of the Children Act 1989.

Children's Social Care (formerly Children's Social Services) have a statutory duty under the Children Act 1989 that is reinforced by the Children Act 2004 to ensure the welfare of a child. When a child protection referral is made, its staff have a

legal responsibility to make enquiries. This may involve talking to the young person and family and gathering information from other people who know the child. Inquiries may be carried out jointly with the police where a crime against a child is alleged. There is always a commitment to work in partnership with parents or carers where there are concerns about their children.

For further information about the statutory agencies see Appendix E.

10.4 Safeguarding Procedures

Procedures for dealing with allegations or suspicion of abuse against an employee of the College at work (see Appendix A: Reporting Procedure Flowchart)

There may be three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence
- Enquiries and assessment by children's social care about whether a child is in need of protection or in need of services
- Consideration by the College as employer of disciplinary action in respect of the employee against whom the allegation has been made.

The unambiguous interaction of each strand with the others is the responsibility of the relevant Principal Safeguarding Officer, in consultation with the Lead Safeguarding Officer and College senior management and external agencies, to ensure that the response to each allegation is handled appropriately.

The Principal Safeguarding Officer for Barts and The London School of Medicine and Dentistry will have additional responsibility for ensuring that the operation of the safeguarding arrangements in the School recognise and respond appropriately to the particular employment contexts (and handling of disciplinary procedures) of Clinical Academics and NHS Consultants. The PSO will liaise with the LSO and the College's Director of HR to ensure effective liaison with the NHS where this is necessary.

The College's actions in responding to any such allegations will be informed by guidance contained in "Working Together to Safeguard Children" (March 2013) published by HM Government.

<https://www.gov.uk/government/publications/working-together-to-safeguard-children>

The Principal Safeguarding Officer who receives a report of an allegation should immediately inform the Lead Safeguarding Officer who will liaise with the head of department of the employee accused and the Director of HR about the allegation and explain the action that needs to be taken. (In the absence of the head of department, or if s/he is the subject of the complaint, the relevant Vice Principal should be notified).

The Lead Safeguarding Officer should consult the Children's Social Care as soon as possible and within one working day as part of the initial consideration to establish whether the allegation warrants further investigation.

The head of department should meet with the employee accused to inform her/him that an allegation has been made and also explain the course of action that needs to be taken. This meeting should take place as soon as possible after the consultation by the LSO with the Local Authority Designated Officer has taken place. It should be made clear to the employee that the meeting is not an investigatory meeting or disciplinary hearing.

The possible outcomes from the above action may include the following:

(a) that there should be an immediate referral to child protection agencies to deal with the matter (the Principal Safeguarding Officer will be responsible for liaising with Children's Social Care and other relevant agencies).

(b) there is reason to suppose abuse may have occurred and that further investigation by a child protection agency or under the College's HR Code of Practice for Discipline for staff may be necessary.

(c) the allegation was prompted by inappropriate behaviour by the employee which needs to be considered under the College's HR Code of Practice for Discipline for staff.

(d) that the allegation is without foundation and does not warrant further investigation.

Where allegations of abuse call for immediate referral to child protection agencies [as in (a) above]

- subsequent action taken will be in accordance with the Local Safeguarding Children's Board (LSCB) procedures
- the Principal Safeguarding Officer will not be part of the investigating team but they will be expected to contribute to discussions on how the investigation will be conducted.
- the Principal Safeguarding Officer will constantly liaise with the agencies to obtain information on the progress of the investigation and update the Lead Safeguarding Officer and the Director of HR.

The College will be able to conduct an internal investigation. However, investigation by the police or child protection agencies will take priority and any internal processes will be held pending the outcome of these. The circumstances in which an internal College investigation should take place will be discussed with the Local Authority Designated Officer. As a general rule, an internal disciplinary investigation will commence after the child protection agencies have completed their investigation. The College will keep the investigation of all complaints and the records relating to the matter confidential.

Any investigation carried out by the College will follow its HR Code of Practice on Discipline.

10.5. Concerns about a Safeguarding Officer

If the concerns raised by the child relate to the relevant Principal Safeguarding Officer then the concern must be referred directly to the Lead Safeguarding Officer. If it is the Lead Officer about whom concerns have arisen, then contact should be made with the Chief Administrative Officer and/or the Director of HR.

Where appropriate (because of concerns about reporting internally for example) seek advice from the Local Authority Designated Officer who provide support and initiate any necessary action. Expert advice can also be provided by the NSPCC Helpline on 0808 800 5000.

10.6. Procedures for dealing with concerns of possible abuse outside of Queen Mary

Any member of staff who is concerned about an alleged incident which has come to their attention and which occurred outside of the College should raise the matter with the relevant Principal Safeguarding Officers who will ensure that appropriate procedures are followed.

10.7. Procedures for dealing with an allegation of abuse by an individual of an external organisation using Queen Mary facilities

If a child alleges abuse by an employee of an external organisation, a referral must be made to the relevant Principal Safeguarding Officer.

Following the outcome to any related investigation, the Lead Safeguarding Officer will consider with appropriate senior management whether or not the external organisation should be permitted to continue using Queen Mary's premises and facilities.

11. The College's Duty to Refer to the Independent Safeguarding Authority

From 12 October 2009, the College is legally required to make a referral to the Independent Safeguarding Authority when two conditions have been met:

- 1) When it withdraws permission for a member of staff to engage in regulated or controlled activity, or would have done so had that member of staff not resigned, retired, been made redundant or been transferred to a position which is not regulated or controlled activity

because

- 2) the College thinks that the individual has:

- Engaged in *relevant conduct*
- Satisfied the *Harm Test*, or
- Received a caution or conviction for a *relevant offence*

See the Glossary in Appendix D for more information about these terms.

Where these conditions have been met the College must make a referral to the ISA, once it has gathered sufficient evidence as part of its investigations to support its decision to withdraw permission to engage in regulated or controlled activity, and in following good practice, has consulted with the Local Authority Designated Officer if appropriate.

This duty must be acted upon where the College thinks that an individual has caused harm or poses a risk of harm to the relevant vulnerable group, and has removed the individual from the workplace, or would or might have removed him/her if the individual has already left. Once the College has reached this stage, the duty to refer is absolute, and overrides any concerns about data protection.

In order to reach this stage, the College will have implemented its internal disciplinary processes for staff or students as appropriate. The College will review its respective disciplinary procedures in relation to staff and students who carry out regulated activity, to insert in them the point at which the duty to refer is triggered.

The Principal Safeguarding Officers will work with the Director of HR and appropriate other senior colleagues, along with those Designated Officers from the local authority with statutory responsibility for protecting children and vulnerable adults, to ensure that the College meets its duty to refer.

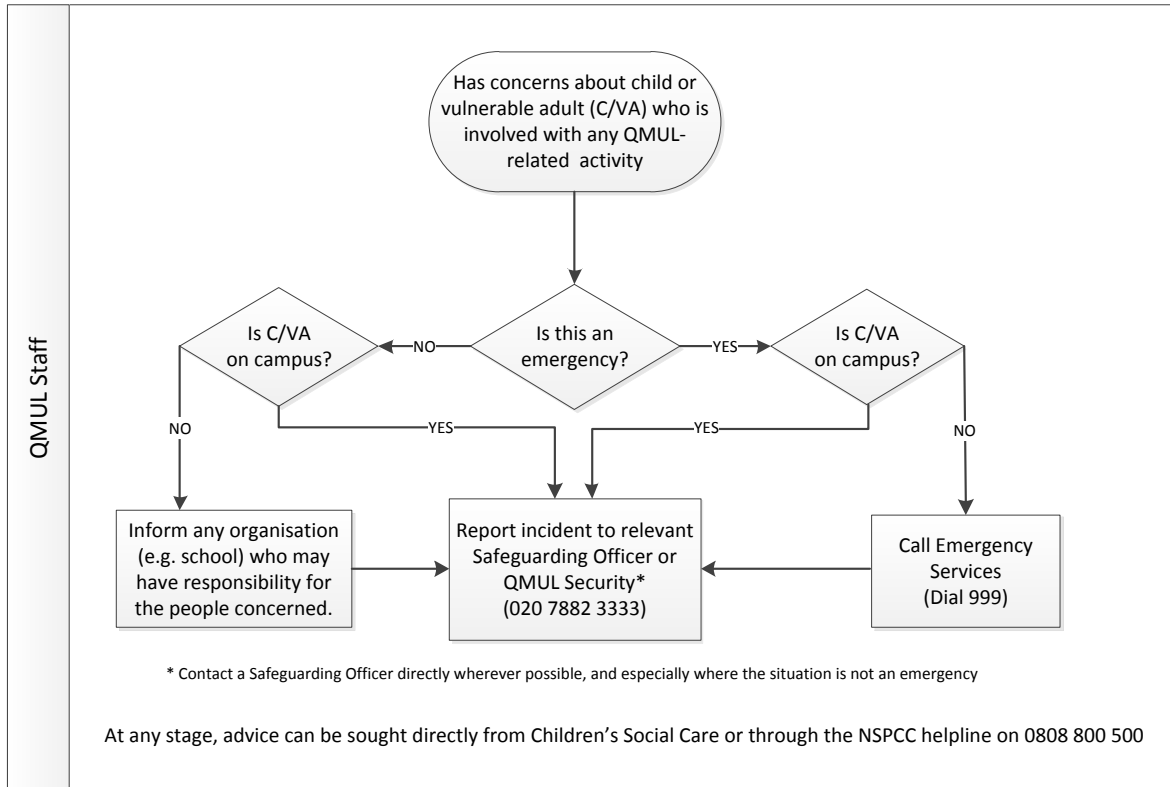
12. Review of College Safeguarding Policy and Procedures

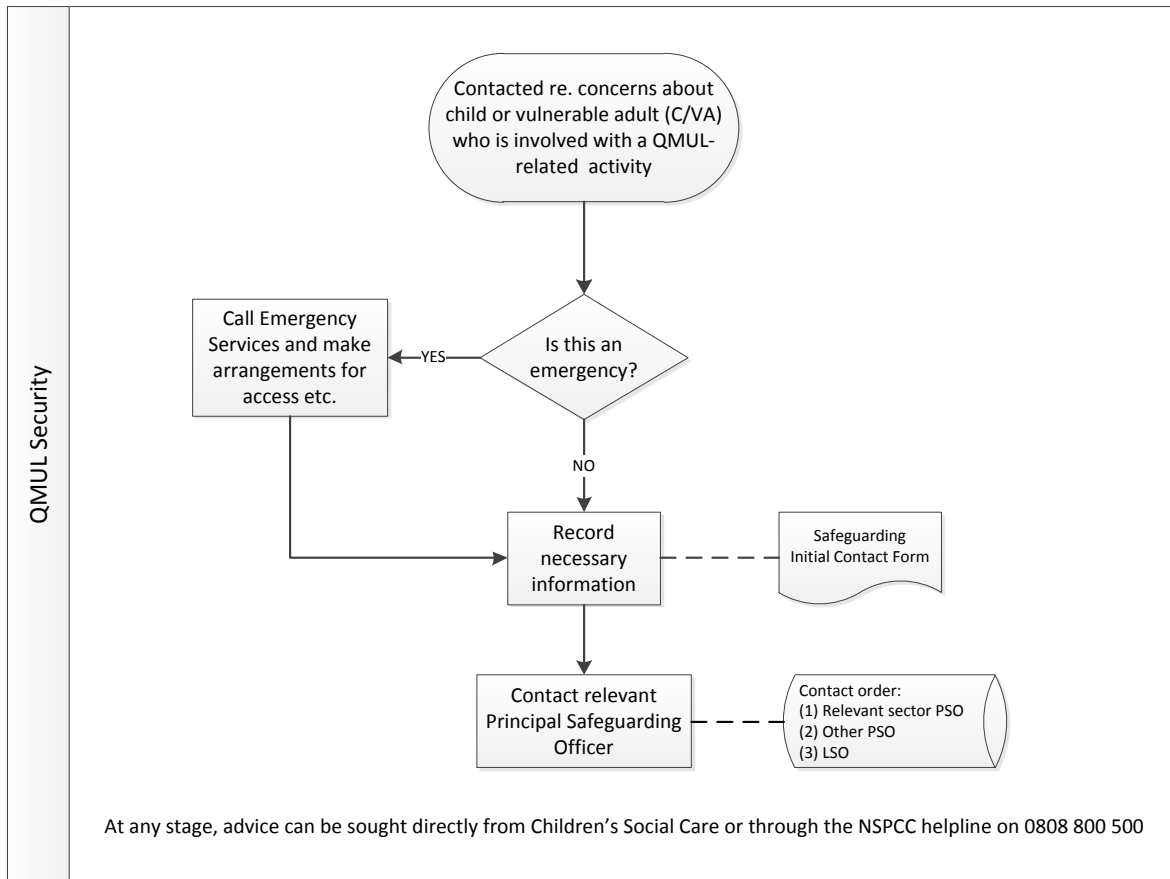
The College's Policy and Procedures for Safeguarding will be monitored and evaluated to ensure they remain up-to-date in terms of legislation, guidance and the phasing in of the Vetting and Barring Scheme and also reflect learning from practice and any significant incident or concern.

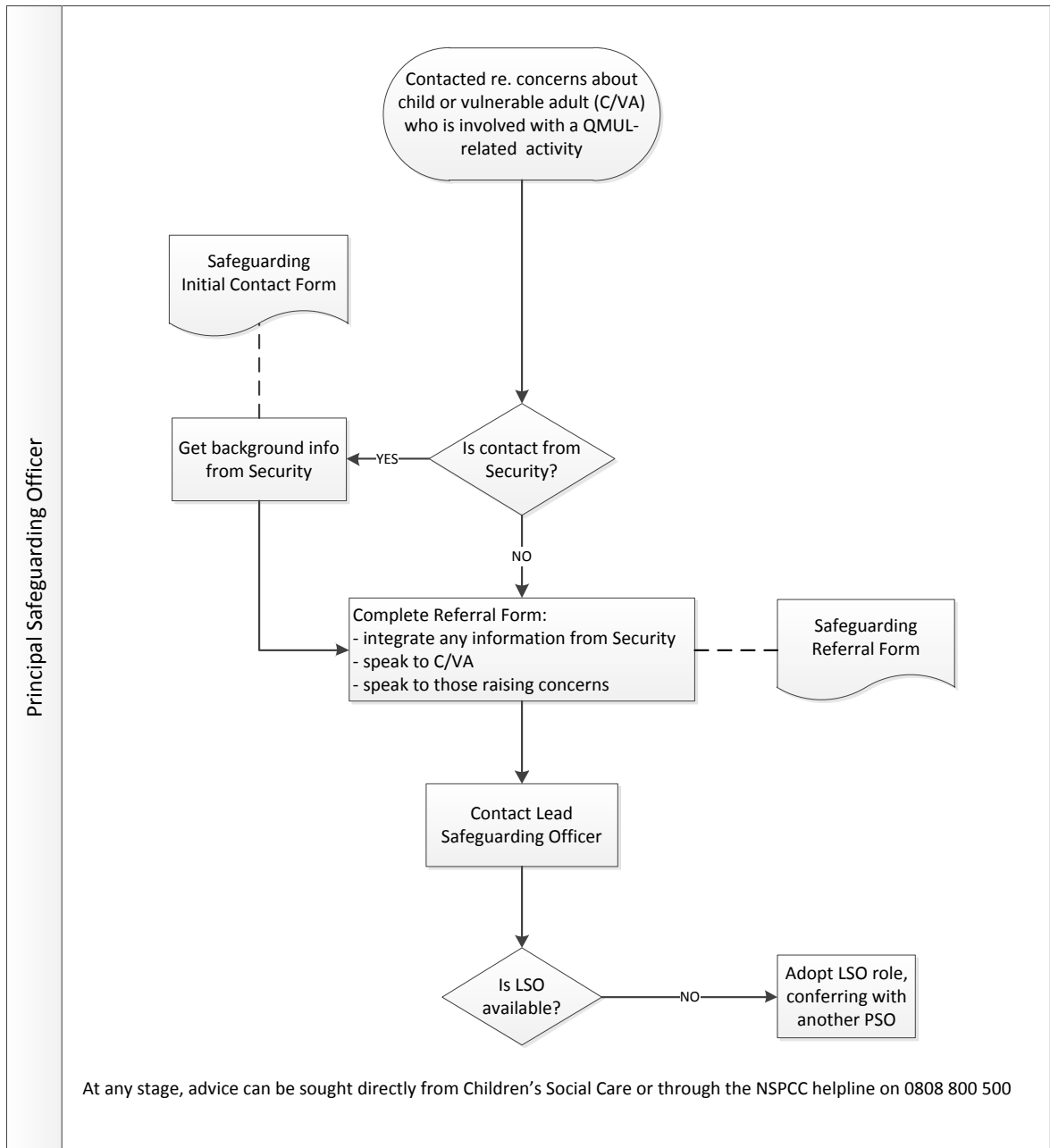
The Policy and Procedures and their implementation in practice will be reviewed annually by the College to ensure robust arrangements continue to meet the College's responsibilities.

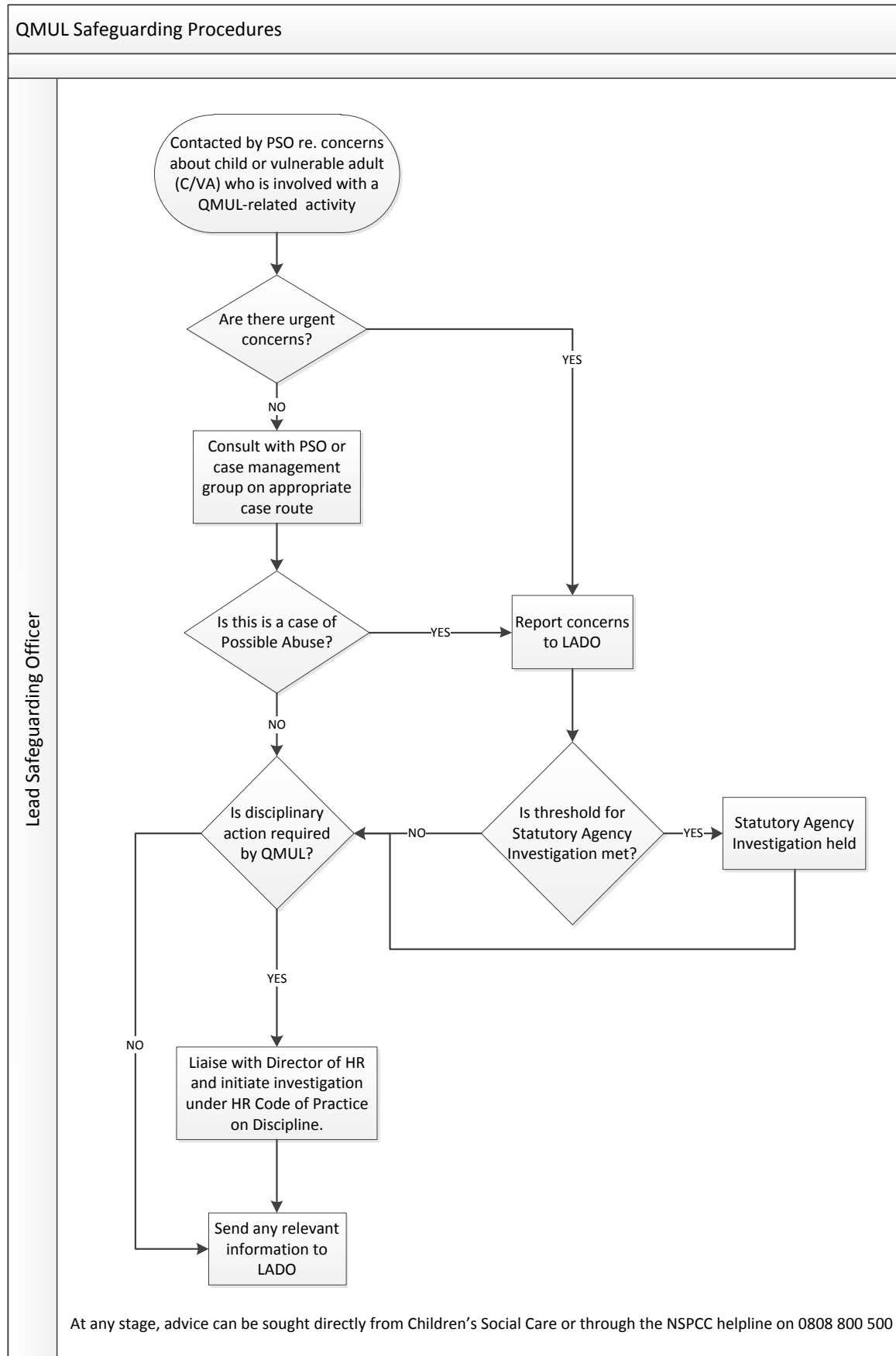
END

REPORTING PROCEDURES









Contact Numbers

Appendix B

Internal

QMUL Security (who will channel referrals through to the PSOs or LSO):

Tel: 020 7882 5000

Lead Safeguarding Officer: Emma Bull

Tel: 020 7882 7385

Mobile: 07883 413783

Email: e.j.bull@qmul.ac.uk

Principal Safeguarding Officer (Humanities & Soc. Sciences): Matt Jacobsen

Tel: 020 7882 3371

Email: m.j.jacobsen@qmul.ac.uk

Principal Safeguarding Officer (Science & Engineering): Sarah Cowsls

Tel: 020 7882 6954

Email: sarah.cowls@qmul.ac.uk

Principal Safeguarding Officer (Medicine & Dentistry): Nick Smith

Tel: 020 7882 3362

Email: n.smith@qmul.ac.uk

Principal Safeguarding Officer (Professional Services): Simon Jarvis

Tel: 020 7882 2765

Email: s.jarvis@qmul.ac.uk

External

Local Authority Designated Officers (LADO):

Tower Hamlets (for Mile End and Whitechapel campuses):

The First Response Team

Tel: 020 7364 5005

Fax: 020 7364 3860

Email: Adultcare@towerhamlets.gov.uk

Or the Emergency Duty Team on:

Tel: 020 7364 4079 (out of office hours)

Islington (for Lincoln's Inn Field campus):

Laura Eden

Children's Social Care

222 Upper Street

London N1 1XR

Tel: 020 7527 8066

Email: laura.eden@islington.gov.uk

Camden (for Charterhouse Square campus):

Families and Social Work

Crowndale Centre

218 Eversholt Street

London

NW1 1BD

Tel: 020 7974 4094 (Duty and Assessment), Out of hours 020 7974 4444

Website: www.camden.gov.uk/childreninneed/

Local Children's Social Care Departments:

Tower Hamlets Children's services

Tel: 020 7364 5006

Islington Children's Social Care

Contact:

Cathy Blair
Director of Child Protection
020 7527 5632
cathy.blair@islington.gov.uk

Camden Safeguarding Children Board

Unit 6/7 Crowndale Centre
218 Eversholt Street
London
NW1 1BD

Tel: 020 7974 6639
Fax: 020 7974 6708
Email: Terry.Ellis@camden.gov.uk

NSPCC Helpline: 0800 800 5000

NSPCC website: <http://www.nspcc.org.uk/>

ChildLine: 0800 1111

Safeguarding Referral Form

PERSONAL DETAILS

Child / Vulnerable Adult

Name	
Date of birth	
Contact details	
Who has parental responsibility?	

Person Reporting Incident

Name	
Position	
Contact details	

Safeguarding Officer

Name	
Position	
Contact details	

INCIDENT DETAILS

Date & Time	
Location	
Nature of concern / allegation	
Observations	Describe what you have seen/heard or what the person reporting the incident has seen/heard.
What was said	Record exactly what the child/vulnerable adult said and what you said. Do not lead the child/vulnerable adult.

ACTION TAKEN

Initial Action	Record what has happened prior to this form being completed
Views of Child / Vulnerable Adult	

CASE CONFERENCE WITH LEAD SAFEGUARDING OFFICER

Date & Time Reported	
Case route decision	

PARENT / GUARDIAN INFORMED

Date & Time	
Name(s)	
Contact details	
Details of discussion	

OTHER STAFF INFORMED

Date & Time	
Name(s)	
Position	
Contact details	
Details of discussion	

EXTERNAL AGENCIES INFORMED

Date & Time	
Name	
Position	
Contact details	
Details of discussion	

FORM COMPLETED BY

Name	
Signed	
Date	

If the incident has been reported to one of the agencies above then, a copy of this form must be sent to them within 24 hours of the telephone report.

Remember to maintain confidentiality (on a need to know basis)-only share if it will protect the child/vulnerable adult. Do not discuss the incident with anyone other than those who need to know.

Adults' Barred List

The list created by the Safeguarding Vulnerable Groups Act (SVGA) 2006. It contains the details of those individuals the Independent Safeguarding Authority has decided it is appropriate to bar from working with vulnerable adults and who are therefore prevented from working or volunteering with them.

Adult in need of safeguarding

See 'Vulnerable Adult' below. There is currently a move away from the terminology 'vulnerable adult' as it has been recommended that this be changed to 'an adult in need of safeguarding' as it has been suggested that the term 'vulnerable adult' reflects a medical model of disability. Some argue that it pathologises and/or stigmatises individuals and creates a victim type status. The new terminology is more in keeping with a social model of disability and recognition that a person should not be defined by their vulnerability and that many of the risks posed to individuals are situational as oppose to inherent.

Child

Throughout this document references are made to 'child/children' and 'young person/people'. These terms are used interchangeably and refer to people under the age of 18 years. 'Children' are defined as any young person under the age of 18 within UK legislation³ and are therefore recognised as having additional vulnerabilities and requiring of greater protection. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children Act 1989.

Child Abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger. The four types of abuse⁴ are:

- Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to

³ Children Acts 1989 and 2004

⁴ Working Together to Safeguard Children, HM Government 2010

a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

- Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

- Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

- Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food or clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or unresponsiveness to, a child's basic emotional needs.

- Bullying

Bullying can be by adults or peers and does not appear within the definitions of abuse. Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are:

- physical (for example, hitting, kicking, theft);
- verbal (for example, racist or homophobic remarks, threats, name-calling); and
- emotional (for example, isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by bullying (including bullying via the internet) can frequently be underestimated. It can cause considerable distress to young and vulnerable people, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm). Queen Mary will not tolerate bullying in any form. The College will take any concerns related to bullying very seriously and will respond swiftly and appropriately in accordance with this safeguarding policy and procedures. All staff, volunteers and others with responsibilities for young people and/or adults in need of safeguarding are expected to rigorously enforce the College's stance on anti-bullying.

Child Protection

Child protection is a small but important element of safeguarding and promoting welfare which relates to specific children or young people who are who are suffering, or are likely to suffer, significant harm⁵. This may relate to a small but significant number of young people within our College and activities. Child protection refers to the activity that is undertaken to protect specific children and young people. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Children's Barred List

The list created by the Safeguarding Vulnerable Groups Act (SVGA) 2006. It contains the details of those individuals the Independent Safeguarding Authority has decided it is appropriate to bar from working with children and who are therefore prevented from working or volunteering with them.

College

For the purposes of this document, the 'College' is Queen Mary, University of London.

Controlled Activities

⁵ Children Act 1989 and Working Together to Safeguard Children, HM Government 2013

Controlled activity is work in a “specified place” (such as a school, childcare premises including nurseries, residential homes for children in care etc) that is not of a specific type of work to make it a “regulated activity” (as defined by the SVGA 2006) but which provides the worker or volunteer with an opportunity for contact with children or vulnerable adults. Controlled activity can include ancillary support work in general health, NHS, adult social care and Further Education (FE) settings and in some positions that allow access to health or Children’s Social Care records.

Higher Education (HE) premises are not included in the list of “specified places”, although a Higher Education Institution (HEI) with a nursery would, for example, be expected to have staff working in ancillary roles who would be involved in controlled activities.

Disclosure of abuse

When a young person or a vulnerable adult informs another person that they have been/are being abused or that someone else has been abused.

Disclosure and Barring Service (DBS)

The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) have merged to become the Disclosure and Barring Service (DBS). Criminal Record Checks are now carried out by the DBS.

Harm Test

The harm test is defined in the 2006 Act, Schedule 3 section 5 and 11 and the 2007 Order Schedule 1 paragraph 5 and 11 and is satisfied if the relevant person believes that an individual may:

- harm a child or vulnerable adult;
- cause a child or vulnerable adult to be harmed;
- put a child or vulnerable adult at risk of harm;
- attempt to harm a child or vulnerable adult; or
- incite another to harm a child or vulnerable adult.

Lead Safeguarding Officer; Principal Safeguarding Officers

“Lead” and “Principal” Safeguarding Officer are terms used for members of College staff with specific responsibilities for managing its Policy and Procedures for Safeguarding Children and Vulnerable Adults.

Local Safeguarding Children Board (LSCB)

LSCBs are established by local authorities. They were made mandatory by the Children Act 2004 and replaced Area Child Protection Committees (ACPCs) in 2006. They are made up of senior managers from the Statutory, Independent and Voluntary sector. LSCBs provide the framework, rules and guidelines in a locality for safeguarding children. The LSCB is the key statutory mechanism for agreeing how the relevant organisations (including the College) in each local area will cooperate to safeguard and promote the welfare of children locally, and for ensuring the effectiveness of what they do.

Regulated activity

At the core of the Vetting and Barring Scheme (VBS) is a concept known as regulated activity. The Safeguarding Vulnerable Groups Act 2006 states that a person is engaging in regulated activity if, on a frequent or intensive basis, they are either carrying out a specified type of work with children or vulnerable adults, or any form of work that takes place at a **specified place** (see **Controlled activity**). “Frequent” is defined as once a month or more on an ongoing basis and “intensive” as three or more times within a thirty day period, or overnight (between 2.00am and 6.00am).

Regulated activities can include, but are not limited to, any of the following:

- Teaching, training or instruction, care or supervision of children or provided wholly or mainly to vulnerable adults;
- Providing advice or guidance for children
- Providing advice, guidance or assistance wholly or mainly to vulnerable adults;
- Any form of healthcare treatment or therapy provided to children or vulnerable adults.
- Driving a vehicle that is being used for the specific purpose of conveying children or vulnerable adults
- Working in a **specified place**

Examples of each specified activity are beyond the scope of this glossary. More information is available from *The Vetting and Barring Scheme Guidance, October 2009* published by HM Government

Relevant conduct

Relevant conduct is set out in the 2006 Act, Schedule 3 sections 4(1) and 10(1) and the 2007 Order Schedule 1 sections 4(1) and 10(1) and state:

Relevant conduct is any conduct:

- That endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult;
- If repeated against or in relation to a child or vulnerable adult, would endanger them or would be likely to endanger them;
- That involves sexual material relating to children (including possession of such material);
- That involves sexually explicit images depicting violence against human beings (including possession of such images), if it appears to ISA that the conduct is inappropriate; or
- Of a sexual nature involving a child or vulnerable adult, if it appears to ISA that the conduct is inappropriate.

Relevant offence

A relevant offence for the purposes of referrals to ISA is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 and the Safeguarding Vulnerable Groups (Prescribed Criteria and Miscellaneous Provisions) Regulations (Northern Ireland) 2009.

A copy of these regulations can be found at www.opsi.gov.uk or www.statutelaw.gov.uk

Safeguarding

Safeguarding and promoting the welfare of children and young people is defined⁶ as:

- protecting children from maltreatment;
- preventing impairment of children's health or development; and
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Safeguarding therefore refers to the actions we take to promote the welfare of all young people and the measures we put in place to ensure a child-focussed

⁶ Working Together to safeguard Children, HM Government 2013

environment and workforce and to minimise the risks of harm.

Safeguarding Vulnerable Groups Act (SVGA) 2006

The SVGA 2006 was introduced in response to the Bichard Review and created a new Vetting and Barring Scheme. This requires all those working in sensitive positions with direct access to children or vulnerable adults to be vetted and registered with the Independent Safeguarding Authority (ISA) which was created by the same Act. They will also be subject to monitoring (meaning that the ISA will be informed as soon as any new convictions emerge). The scheme is being phased in from 12 October 2009.

Significant harm

Introduced in the Children Act 1989 as the threshold that justifies compulsory intervention to protect the best interests of children.

Vulnerable Adult

The most widely accepted definition is that a 'Vulnerable Adult'⁷ is a person aged 18 or over

'who is or may be in need of community care services by reason of mental or other disability, age or illness;

and

'who is or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation'.

There are a number of definitions embedded in legislation. The Protection of Vulnerable Adults Regulations 2002 provides the following: A vulnerable adult is a person aged 18 and over who has one or more of the following conditions (a) a learning or physical disability (b) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or (c) a reduction in physical or mental capacity.

People with physical or mental health conditions, or with learning difficulties or learning disabilities, are not vulnerable adults just because of their condition. They will be defined as vulnerable adults when they receive health, social care or other services, or activities specifically for people with physical or mental health conditions, learning difficulties or learning disabilities.

For the purposes of the Vetting and Barring Scheme, the following conditions are not treated as learning difficulties that lead to classification of the individual

⁷ 'No Secrets', Department of Health 2000

as a vulnerable adult: dyslexia, dyscalculia, dyspraxia, Irlen Syndrome, alexia, auditory processing disorder or dysgraphia.

Local Authority Designated Officers (LADO)

This is a key role that all staff should be made aware of. In accordance with statutory guidance⁸, every Local Authority will have a Designated Officer (LADO) located within Children's Social Care who is responsible for providing advice, liaison and monitoring the progress of cases where allegations have been made against people who work with children. The LADO should be informed directly, or via Children's Social Care/the Police if they are involved, of all allegations that come to the College's attention where it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child; or
- Possibly committed a criminal offence against children, or related to a child; or
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children

This applies to paid and unpaid roles, volunteers, casual, agency or self employed roles and captures concerns/allegations/offences emanating from outside of work as well as within the workplace. The LADO is involved from initial phase to conclusion and provides advice and guidance, helping to determine that the allegation sits within the scope of the procedures. The LADO helps co-ordinate information sharing with the right people- key role in making linkages. They monitor and track any investigation in the expectation that it will be resolved as quickly as possible.

The College Lead Safeguarding Officer will provide support to ensure that the College and its staff comply with this requirement.

Children's Social Care (previously Social Services)

Children's Social Care have a statutory duty to ensure the welfare of children and to work with the LSCB to comply with its procedures. When a safeguarding referral is made, Children's Social Care has a legal responsibility to make enquires where a child who lives or is found in their area is considered to be at risk of, or actually suffering from, significant harm. This may involve talking to the child and family, and gathering information from other people who know the child. Enquires may be carried out jointly with the Police where a crime has been alleged. If action needs to be taken urgently and out of office hours, then the Police will deal with the enquiry sensitively and effectively. Children's Social Care will link in closely with their respective LSCB and cross-reference the guidance produced by the LSCB. Children's Social Care are also a very important source of advice and support.

⁸ Working Together to Safeguard Children, HM Government 2013

Police Child Abuse Investigation Teams/Units

This is the team within the local Police who will investigate all cases of abuse against children that occurs within family relationships, by professionals or carers and cases of organised abuse where it is suspected that an offence has been committed. The Units also investigate the activity of people who use the internet and other means to distribute or collect abusive and indecent images of children.

Units are also responsible for dealing with individuals who are registered sex offenders, under the terms of the Sex Offenders Act 1997 and other offenders who are regarded as a potential danger to the community.

Units work jointly with a range of other agencies, but primarily Children's Social Care in relation to Child Abuse and the National Probation Service, in relation to Sex and Other Dangerous Offenders.

The staff in the Units are specially selected for their skills in dealing with complex and sensitive crime and receive comprehensive initial training and a period of tutorship with an experienced Unit member. The training includes methods of obtaining evidence from vulnerable victims and witnesses, the preservation and security of forensic samples and other specialist training on how to investigate child abuse and sex offences.

Where staff or volunteers are made aware from any source that any person working with young or vulnerable students at Queen Mary is subject to a safeguarding investigation by either Children's Social Care, the LSCB or the Police they must always inform the Lead Safeguarding Officer immediately.

The College has appointed Safeguarding Officers at two levels i.e. strategic and operational. The Lead Safeguarding Officer has a strategic role within the College, supported by four Safeguarding Officers with operational responsibility.

The four operational posts will cover each of the three academic sectors and Professional Services (to include Aim Higher/Widening Participation activities and the organisation of summer schools).

Lead Safeguarding Officer

- Responsibility for co-ordinating the College's overall safeguarding practice, ensuring that the HEI has a safeguarding children and vulnerable adults policy and procedures in place, incorporating any Local Safeguarding Children Board and Adult Care Team guidance from the relevant local authority;
- Oversight of the monitoring and review of systems and procedures to ensure they remain up-to-date in relation to guidance and legislation;
- Responsibility for ensuring that safeguarding is afforded utmost priority at the most senior level within the College;
- Developing, maintaining and reviewing the College's safeguarding implementation plan;
- Oversight, coordination and review of internal departmental working and processes in relation to safeguarding activity, to ensure integration of College policies and procedures;
- Production of annual report on safeguarding practice in the College, including a Risk Register;
- In consultation with the Director of HR, liaison about the further development of safe recruitment procedures, corporate practice concerning DBS guidelines, and the induction and training of new staff;
- Management of cases of poor practice or abuse reported to the College;
- Ensuring that appropriate safeguarding mechanisms and expertise underpin the College's recruitment procedures in liaison with the Director of Human Resources;
- Responsibility for being the central point of contact for any safeguarding concerns for any internal/external individual or agency;
- Maintenance of contact details for local statutory agencies and LADOs;
- Dissemination of the safeguarding policy, procedures and supporting guidance throughout the College;
- In partnership with the Director of HR, ensuring appropriate operation of the College's HR Code of Practice on Discipline with respect to managing allegations or suspicion of abuse by College staff during the course of their employment and the operation of the Child Protection procedures;
- Ensuring that secure records of child protection concerns are stored and shared appropriately in compliance with data protection legislation;

- Creating and maintaining links with the Health and Social Care Teams operating from the College's local authorities;
- Creating, maintaining, advising and supporting the network of Principal Safeguarding Officers;
- In liaison with the Director of HR, referring any suspected cases of abuse to the relevant statutory agency;
- Providing advice and support to staff
- Prompt recommendation of remedies to address any deficiencies or weaknesses with regard to safeguarding children and vulnerable adults that are brought to their attention;
- Advising on the College's safeguarding training needs and development of its safeguarding training strategy.

- Acting as a source of support to all sector staff and volunteers regarding safeguarding and practice guidance;
- Responsible for the initial phase of any safeguarding investigation (see procedural flowcharts)
- Close liaison with the Lead Safeguarding Officer to inform them of any issues and the status/progress of continuing investigations;
- Acting as the lead member of staff with responsibility for overseeing the implementation of the College's overall policy framework in ways which meet the individual circumstances of the sector;
- Ensuring concerns are responded to appropriately and that confidentiality is maintained;
- Ensuring that any sector needs for training and/or resources to support implementation are identified and communicated to the Lead Safeguarding Officer;
- Acting as a source of support, advice and expertise within the sector when a decision to make a referral to the appropriate external agency is taken;
- Promoting safe practices and a culture where concerns are reported and responded to proportionately and swiftly in accordance with this policy and procedures;
- Internal coordination and consultation as part of any referral by the postholder of cases of suspected abuse or allegations to the relevant investigating agencies;
- Implementation of cover arrangements between the PSOs and LSO.

Note: The PSO for Barts and The London School of Medicine and Dentistry will have additional responsibility for ensuring that the operation of the safeguarding arrangements in the School recognise and respond appropriately to the particular employment contexts (and handling of disciplinary procedures) of Clinical Academics and NHS Consultants. The PSO will liaise with the LSO and the College's Director of HR to ensure effective liaison with the NHS where this is necessary.

Staff Code of Behaviour - Young People and Vulnerable Adults

Why have a Code of Behaviour?

Staff participating in College events and activities may be in a position or situation to harm or abuse young people or vulnerable adults or behave inappropriately towards them. To minimise the risk of this, the College has a Code of Behaviour which is designed to help to:

- deter anyone who wishes to harm a young person or vulnerable adult from seeking employment in the College
- provide guidance for everyone about acceptable and unacceptable behaviours with young people and vulnerable adults
- to identify staff (and students working for the College) who need further safeguarding training

Code of Behaviour

The College wishes to ensure that all its staff who work with young people and or vulnerable adults understand the boundaries of appropriate behaviour. Every member of staff is required to demonstrate exemplary behaviour in order to protect young people and vulnerable adults from abuse and to protect themselves from false allegations. The following are examples of behaviour that create a positive and safe environment for vulnerable groups as they participate with us in College activities.

Staff should:

- Treat everyone with fairness and respect and provide an example that you would wish others to follow
- Work openly avoiding private or unobserved situations and working in isolation. Try to ensure that you are not the only adult present and are at least within sight or hearing of others. Leave the door open if you find yourself in a room alone with a young person or vulnerable adult
- Maintain a safe and appropriate distance and be aware that physical contact may be misinterpreted
- Respect each young person's right to privacy
- Exercise caution when discussing sensitive issues with children or vulnerable adults
- Behave according to the guidance offered in this Code

- Ensure that if any form of manual/physical touching is required, it should be provided openly. Ideally the reason why this is necessary should be explained to the young person and their informed agreement gained. In sporting situations this should be according to guidelines provided by the appropriate National Governing Body, and in other instances according to College policy.
- Challenge all unacceptable behaviour (staff or student) and report all allegations or suspicions of abuse to the Principal Safeguarding Officer for your sector/department
- Always put the welfare of the young person or vulnerable adult first
- In all activities feedback should be constructive rather than negative
- Report all concerns, allegations or suspicions of abuse immediately to the relevant principal safeguarding officer

Staff should never:

- Spend excessive time alone with young people or vulnerable adults away from others
- Discuss their personal life
- Give out their personal contact details (personal phone or mobile number, email or home address)
- Leave a group of young people unsupervised
- Allow a child or young person to use inappropriate language without challenging it
- Do things of a personal nature that young people or vulnerable adults can do for themselves (If a child has a disability any tasks should be performed only with the full understanding and consent of the parent or guardian and, where possible, the child themselves)
- Allow allegations made by a young person or vulnerable adult to be ignored, not recorded or not acted upon
- Engage in rough physical or sexually provocative games
- Make sexually suggestive comments, even in fun
- Allow or engage in any form of inappropriate touching
- Reduce a child to tears as a form of control

In residential settings, staff should never:

- Share a room overnight with a young person or vulnerable adult or invite them into their room
- Go into a young person or vulnerable adults' room unless it is absolutely necessary (if it is necessary, two members of staff should enter)
- Take photographs, videos or other images of a young person

without the express permission and informed written consent of their parents

