



Safeguarding Policy and Procedure

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Safeguarding Policy and Procedure

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SAFEGUARDING CHILDREN & ADULTS AT RISK POLICY & PROCEDURE

1. Introduction

- 1.1. This document sets out the University's policy and procedures to ensure a safe environment for children and adults at risk.
- 1.2. This policy aims to ensure children and adults at risk, and all those who work with them, are safe and supported within the institution and when participating in its organised activities.
- 1.3. The University believes all individuals have a right to learn and develop within a safe environment and is committed to protecting children and adults at risk from harm. The University is not, however, 'in loco parentis' (in the place of the parent) and cannot accept the responsibilities of a guardian for any member of its community.
- 1.4. The University also recognises its responsibilities to protect staff, students, contractors, governors, consultants and volunteers against unfounded allegations of abuse.

2. Scope

- 2.1 This policy applies to all University staff, applicants, students, volunteers, appointees, University representatives, and visitors to the University. It applies to all activities involving contact with children or adults at risk, including where those activities are delivered virtually via an online environment.
- 2.2 For the purposes of this policy, "University staff" refers to any permanent, fixed term, associate, temporary or other member of staff employed by the University, including student ambassadors and any other students employed to work in any capacity at the university. For staff on secondments or contracts elsewhere, it should be clear which organisation's safeguarding policies and procedures should be followed.

3. Definitions

- 3.1. A "student" is anybody who is enrolled on a University of Roehampton programme of study, as defined in the University's Academic Regulations.
- 3.2. An "apprentice" is anybody who is enrolled on a University of Roehampton apprenticeship.
- 3.3. The "employer" is the person or organisation who hires and trains the apprentice and contracts the University to be the apprenticeship training provider.
- 3.4. "Children"¹ are people under the age of 18 years.
- 3.5. The term "adult at risk" is used in this policy in place of "vulnerable adult". We use "adult at risk" as a replacement for "vulnerable adult", as "adult at risk" is used throughout existing government [guidance](#).
- 3.6. "Adults at risk" are people aged 18 years or over, who:
 - have needs for care and support (whether or not those needs are being met by the local authority),
 - are experiencing, or are at risk of, abuse or neglect, and
 - as a result of those needs, are unable to protect themselves against the abuse or neglect or the risk of it.
- 3.7. "Abuse" is a violation of an individual's rights through the inflicting of harm or, through omission resulting in harm. Types of abuse are defined in **Appendix B**.
- 3.8. "Neglect/Self-Neglect" is the persisting failure to meet an individual's basic physical

¹ In this document, as in the Children Acts 1989 and 2004 respectively, a child is anyone who has not yet reached their 18th birthday. The term 'children' includes 'children and young people' throughout this policy.

or psychological needs. This includes failure to provide access to appropriate healthcare, support, or educational services; the withholding of the necessities of life, such as medication, nutrition, and heating.

- 3.9. "Radicalisation" is the process by which an individual comes to support terrorism and/or extremist ideologies associated with terrorist groups.

4. Policy statement

The University safeguards children and adults at risk in the following ways:

- 4.1. By seeking to make the University safe and welcoming for all.
- 4.2. By prioritising specifically the welfare and protection of children and adults at risk.
- 4.3. By appointing staff with specific responsibilities regarding safeguarding (see section 7).
- 4.4. By giving staff information, training and guidance about how to recognise potential abuse, how to respond appropriately and report it, and by making staff aware that they have a responsibility to report any concerns they are aware of regarding a safeguarding matter to the appropriate person (see sections 7, 12 and 13).
- 4.5. By adopting a broad approach to its safeguarding responsibilities which encompasses well-recognised forms of abuse (see Appendix B), but also considers issues such as the prevention of radicalisation amongst students. The University complies with its duties under Prevent in relation to the Counter-Terrorism and Security Act 2015. Aspects of the Prevent Duty relating to freedom of speech are outlined in the [Code of practice on freedom of speech](#).
- 4.6. By ensuring all suspicions and allegations of abuse are taken seriously, investigated and responded to swiftly and appropriately.
- 4.7. By consulting potential victims of abuse and, where possible and appropriate, taking their views into account as part of deciding an appropriate course of action.
- 4.8. By sharing information appropriately, working in partnership with relevant agencies, and ensuring that all parties recognise their responsibilities to each other, including acting upon them and accepting collective responsibility for safeguarding arrangements.
- 4.9. By ensuring that all staff adhere to this policy and that all managers ensure that the policy is an integral part of induction and training.
- 4.10. By ensuring that the Principal Safeguarding Officer and Designated Safeguarding Leads keep abreast of legislative and sector developments. Key staff working closely with adults at risk and children should also have regular training. Mandatory online safeguarding training is available for all staff to complete every two years and forms part of a suite of e-learning that has to be completed during probation..

5. General good practice for staff

- 5.1. Everyone who works at Roehampton shares a responsibility for making the University a safe and secure environment for all its members.
- 5.2. Safeguarding concerns should be addressed promptly and appropriately, including through the sharing of relevant information where necessary to protect a child or adult at risk. Staff should not allow concerns about confidentiality, data protection, professional boundaries or internal processes to prevent appropriate action being taken. Staff should not collude with a student, colleague or any other individual by agreeing to withhold any information pertaining to any issue related to safeguarding.
- 5.3. Any member of staff whose normal duties will include regulated activity will be vetted by a DBS check (see Appendix C) before taking up the role and are obliged to notify the University of any subsequent criminal cautions or convictions that may impact

upon their future employment with the University.

- 5.4. The University considers that intimate or sexual relationships between staff and students under the age of 18 or who are adults at risk to be an abuse of trust, and notes that such relationships may also constitute a criminal offence. All staff are expected to familiarise themselves with, and comply with, the University's [Professional Boundaries and Personal Relationships Policy](#) and the University's obligations under OfS general condition of registration E6, details of which can be found [here](#)
- 5.5. One-to-one meetings with students or apprentices under the age of 18 or adults at risk, or other meetings outside the normal teaching/office environment, should be conducted with due regard to the potential sensitivity of the situation. Ideally meetings should be conducted in an area where at least one other member of staff is present, or in close vicinity, including online meetings and interviews.
- 5.6. Unnecessary physical contact with children or adults at risk should be avoided. Whilst these gestures may be well intentioned, such acts are not always welcomed by the recipient or are misinterpreted by third parties.
- 5.7. Staff administering first aid should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued. However, staff should not hesitate to issue first aid in an emergency.
- 5.8. Care should be exercised in the use of language. For example, unnecessary comments which have or could be interpreted as having an inappropriate sexual connotation should be avoided.
- 5.9. The personal telephone number, personal email or home address of any staff member should not be given to children or students/apprentices who are adults at risk.
- 5.10. In situations where it is necessary for a trained staff member to restrain a person in order to prevent injury or damage, only the minimum force necessary must be used and any action taken must be to restrain only, and only for as long as is necessary to prevent harm. Anyone not trained should be assisted by Security.
- 5.11. There will be occasions when children and adults at risk are placed in settings outside of their normal place of study (e.g. a placement, field trip, summer school, or taster event). Organisers must ensure that appropriate DBS checks have been made, risk assessments are conducted, and procedures are in place to protect children and adults at risk from harm.
- 5.12. In the case of any child or adult at risk making a disclosure of abuse, or where there is cause for concern, the staff member should explain to the student or apprentice that this information will have to be reported and follow the advice in Section 13 of this policy. Do not attempt to resolve any concerns alone and report all allegations or suspicions of abuse.
- 5.13. If a member of staff feels that they or other members of the University may be at risk from being the subject of or exposed to unwarranted accusations in connection with children or adults at risk, they should alert their Dean of School/Faculty or line manager and contact the Designated Safeguarding Lead at safeguarding@roehampton.ac.uk
- 5.14. Any individual can contact safeguarding@roehampton.ac.uk to raise a safeguarding concern.

6. Contextual Safeguarding

- 6.1.** The University recognises that children and adults at risk may experience significant harm that can take place within extra-familial contexts. As such, the University is committed to including these contexts within prevention, identification, assessment, and safeguarding activities. The University shall work in partnership with Local Authorities and other agencies to identify and proportionately intervene within such contexts that the University has exclusive control over, such as on-campus accommodation and learning spaces.

DETAILED PROCEDURES

7. Safeguarding Roles & Responsibilities

Principal Safeguarding Officer	Chief Operating Officer <i>Deputy: Executive Director of Student and Academic Services</i>
Responsibilities: - To have overall responsibility for implementation and promotion of the University's Safeguarding Policy. - To ensure that the Safeguarding Policy and guidance is updated regularly and reflects changes to legal requirements and good practice. - To ensure adequate records of any safeguarding allegations, investigations or referrals and their outcomes, are maintained by the Designated Safeguarding Leads and their deputies.	
Designated Safeguarding Leads	
For student concerns:	DSL: Head of Wellbeing <i>Deputy DSL: Deputy Head of Wellbeing and Disabilities and Complex Case Manager</i>
For staff concerns:	DSL: Chief People Officer <i>Deputy DSL: Deputy Director of Human Resources</i> <i>Plus other members of staff who may be asked to undertake Designated Safeguarding Lead training</i>
Responsibilities: - To receive reports of welfare concerns for children or adults at risk. - To respond to safeguarding concerns, allegations of abuse or non-compliance occurring on University premises or involving University staff, students, apprentices or volunteers, and of connected third parties and ensure appropriate and timely actions are taken to reduce and contain risk, as required, and that, where appropriate these are escalated to relevant colleagues and the Principle Safeguarding Officer for further investigation - To make adult at risk and child safeguarding referrals to relevant agencies as appropriate.	
University Council	
- The University Council has ultimate responsibility for safeguarding within the organisation and for compliance with all legal obligations by the University. - The University Council shall consider the health and safety implications of strategic decisions and ensure that emergency planning arrangements are kept up to date.	
Human Resources Department	

- To determine which staff roles require DBS checks and the required level of check and undertake all checks for relevant staff, maintaining appropriate records.
- To keep up to date with legal requirements and recommendations for good practice in relation to staff DBS checks and other relevant aspects of the recruitment and selection of staff.
- To ensure that safeguarding information is disseminated to staff.
- To provide updated training in safeguarding as part of the staff development programme.

Deans/Directors of Services
• To ensure that all activity and contact in their area involving children or adults at risk is conducted in accordance with this Safeguarding Policy and Procedure. • To develop local safeguarding procedures relating to specific activities with the assistance of a Designated Safeguarding Lead. • To report any apparent non-compliance to the Principal Safeguarding Officer. • To ensure their staff engage with centrally organised training courses.
Line managers
• To ensure that all staff for whom they are responsible are made aware of the Safeguarding Policy and Procedure. • To ensure that all staff for whom they are responsible complete the mandatory online Safeguarding training and refresher training. • To provide information to HR to enable identification of any staff roles which require a DBS check (See Appendix C). • To report any apparent non-compliance to the Principal Safeguarding Officer.
Organisers of activities involving students and apprentices
• To ensure that all aspects of the activity are compliant with the Safeguarding Policy and Procedure. • To ensure students and apprentices are DBS checked as appropriate and in compliance with this policy, for example, if we are organising a University activity that will involve children or adults at risk or, if we are offering sports coaching opportunities to our student apprentices and those being coached are under the age of 18. • To ensure adequate risk assessments are undertaken.
Organisers of activities involving <u>non</u>-students
• To ensure that all aspects of the activity are compliant with the Safeguarding Policy and Procedure. • To ensure staff and others involved in providing the activity (e.g. students, apprentices, student-staff, apprentice-staff, volunteers, etc) are DBS checked as appropriate and in compliance with this policy. • To ensure adequate risk assessments are undertaken.
All staff, volunteers, appointees, student-staff, apprentice-staff, students and apprentices acting on behalf of the University
• To report any concerns for the welfare of children and/or adults at risk to a Designated Safeguarding Lead or Deputy.
Visitors
• All visitors who bring children or adults at risk into the University (unless to participate in a University organised activity) are not relieved of their duty of care on University premises. For any queries relating to Health and Safety, please contact the Health and Safety Office or refer to the Health & Safety Policy.

8. Safeguarding for students and apprentices who are adults at risk or under the age of 18 years

8.1. General

- 8.1.1. The University does not discriminate on the basis of any of the protected characteristics as defined under the Equality Act 2010, and will make reasonable adjustments to admit suitably qualified applicants who are under 18 years old or who are adults at risk.

- 8.1.2. The University and all its services and facilities constitute a predominantly open access and adult environment. As such, the University treats all students and apprentices as independent, mature individuals. Staff members are not routinely DBS checked unless their work warrants it by involvement in regulated activity.
- 8.1.3. As stated at the beginning of this policy, the University does not accept the rights, responsibilities and authority that parents have in relation to a child and will not act in loco parentis in relation to students and apprentices who are under the age of 18 years.
- 8.1.4. The standard personal and academic support arrangements apply equally for all students and apprentices. However, the University acknowledges that students and apprentices under the age of 18 and adults at risk may have additional needs in relation to their support and welfare and the University requires self-disclosure of information and may require additional information by students and apprentices to support this.
- 8.1.5. The University's Conditions of Use of Communications and IT Facilities prohibits their use to access, store or distribute material, which is offensive, obscene, indecent, discriminatory, or harassing.

Advice on data and computer security and keeping safe online is provided for staff and students and apprentices on the [Policy Page](#).

8.2. Admission

Children

- 8.2.1. Children who are admitted as students or apprentices to the University are subject to the standard admissions procedures.
- 8.2.2. The University identifies students or apprentices who are under 18 on entry and Student Support Services provides this information to staff who may come into contact with them, in order to ensure appropriate safeguarding measures are put in place. These staff may include Heads of Colleges and Senior College Wardens, Deans of Academic Schools/Faculties and relevant Programme Tutors or Leaders and Academic Guidance Tutors, staff in Student Support Services, the Head of Security..
- 8.2.3. Home students who are under 18 are required to provide the University with names, contact details and consent from a parent/legal guardian to attend/ travel to/ reside at the university (as applicable). These details need to be provided at the point of enrolment and students who are under 18 are unable to complete their university registration until these details have been provided.
- 8.2.4. For international students who are under 18, consent must be from all adults with custody of the child; if both parents share custody, we require consent from both. If one adult has sole custody, a single consent is acceptable, along with evidence that they have sole custody.
- 8.2.5. The parents or guardians of international students who are under 18 are required to nominate a guardian permanently resident in the UK for the period that the student remains under the age of 18. This nomination is to be made and communicated to the University prior to the student's entry. Failure to make such a nomination may result in an application being rejected.
- 8.2.6. The University will seek to work with applicants who will be under the age of 18 on entry and their parent or guardian to carry out an individual 'risk and readiness' assessment to ensure that appropriate safeguarding measures are put in place, and to ensure that the parent or guardian has a full

understanding of the nature of the University environment and the support that is (and is not) available.

Applicants who have a criminal record

- 8.2.7. The University has an enhanced review process regarding the admission of applicants who have a criminal record. Details are available within the [Admissions Policy](#).
- 8.2.8. Where the course of study is likely to bring the individual into contact with children or adults at risk, information is required through the Disclosure and Barring Service (DBS). All admissions decisions are made in good faith on the basis of the information in the application.
- 8.2.9. In line with the student contract, the University may withdraw an offer at any stage from an applicant who has made false statements or omitted significant information in their application.
- 8.2.10. Students and apprentices are required to inform the University and their professional placement (if applicable) of any cautions or convictions that may occur after their DBS check.

8.3. Contracts

People who are 16 or 17 years old can enter into necessary contracts for such matters as education and accommodation, even though they are not considered legally competent under English law to enter into all legal contracts. Students or apprentices of 16 years and above will therefore be expected to sign their own University registration and accommodation contract where appropriate.

Adults at risk are similarly able to enter into contracts unless they lack capacity to make decisions for themselves. It is assumed by the University that students or apprentices who are classed as adults at risk have the capacity to sign contracts for themselves unless the University is presented with evidence to the contrary.

8.4. On-Campus Accommodation

Upon arrival, all residents under the age of 18 will be contacted with information regarding support services, life at University and an outline of support offered to under 18s. Student Support Services provide a named contact person for students or apprentices under the age of 18 and offer to meet them in person.

8.5. Alcohol

It is illegal for alcohol to be purchased by or sold to people who are under the age of 18 years. The University takes reasonable steps to seek to ensure that the law is not broken in relation to licensed premises under the University's control but cannot undertake to supervise individual students or apprentices. The Students' Union and third parties it contracts is responsible for ensuring that appropriate arrangements are in place for any premises for which it holds the license.

8.6. Parental and third-party involvement

In normal circumstances the University deals directly with students or apprentices (with whom it has a contractual relationship) and not with parents or other third parties unless consent has been granted to contact others, and this approach applies to students and apprentices who are adults at risk or are under 18 years of age.

The University has duties under data protection legislation and therefore only discloses information regarding students and apprentices (including adults at risk or under 18-year olds) to third parties (including parents, guardians and next of kin) in accordance with its [Data Protection Policy](#) and the relevant [privacy notice](#). However, parents or guardians have responsibility for students or apprentices outside of planned activities and for travelling arrangements to/from University.

8.7. Emergency contacts

All students are asked to give emergency contact details as part of their registration. For students under the age of 18 at registration, this is mandatory. In most instances, students' consent is sought before an emergency contact is contacted. However, there are times when a decision may be made by the Designated Safeguarding Lead or their deputy to contact a student's emergency contact due to a significant level of perceived risk to, or in relation to, a student.

8.8. Sexual relationships

Under the Sexual Offences Act 2003, it is a criminal offence for a person to engage in a sexual relationship with a person under the age of 18 when they are in a position of trust with that person. The University will report any allegations of such an offence to the police. At the University, all staff, volunteers and anyone formally representing the University are considered to be in a position of trust for this purpose.

8.9. Field Trips

Courses may involve compulsory or optional field trips or periods of study away from the University. The University includes the safeguarding of under 18-year-olds and adults at risk in the pre-departure risk assessment procedure and makes appropriate arrangements on the basis of this assessment, advised by the Health & Safety Office. Beyond this, and the general requirements of this policy and procedure, no additional arrangements are made.

9. Safeguarding arrangements for children and adults at risk who are not students or apprentices

9.1. Lost children

Any concerns or information regarding lost children should be reported urgently to the 24-hour Security Control Room (ext. 3333 or 020 8392 3333) and to a Designated Safeguarding Lead.

9.2. Organised activities

The safeguarding of children or adults at risk visiting the University is the responsibility of the organiser of the activities in which the children or adults at risk are participating. This includes Summer Schools and organised visits such as school visits to campus.

Where the University is not formally the organiser of the activities, it accepts no liability as communicated with external organisers.

It is the responsibility of the organiser of activities to ensure that staff, student-staff and apprentice-staff are DBS checked and that comprehensive risk assessments are undertaken in relation to the health, safety and wellbeing of children participating in activities on the University campus. Advice on safeguarding for University staff organising activities for children or adults at risk should be sought from the Designated Safeguarding Lead or Deputy DSL (see Section 7) and the Health & Safety Office (regarding risk assessment).

All staff, including those employed on a temporary basis, for example Student Ambassadors, who work very closely with school and college students should follow the procedures below, speaking in the first instance to the Designated Safeguarding Lead or their Deputy.

Where the University is not the organiser of the activities, fully completed risk assessment documentation and assurances regarding completion of DBS checking procedures must be provided before any booking may be confirmed.

9.3. Ad hoc visitors

Children or adults at risk on campus remain the responsibility of their parent/ guardian at all times or of the organisation who has facilitated their visit.

9.4. Employment of children

From time to time the University may employ, or offer periods of formal or informal work experience to people under the age of 18 years. If the child is over 16 years old, their supervision is not constituted as regulated activity and the supervisor does not need to be DBS checked. The Designated Safeguarding Lead should be consulted for all under 18s that we employ.

Different provisions apply for children aged under 16 years old, and the advice of a Designated Safeguarding Lead (see Section 7) should be sought in relation to ensuring safeguarding responsibilities are fulfilled.

9.5. Use of IT facilities

The University's 'Conditions of Use of Communications and IT Facilities' prohibit their use to access, store or distribute material which is offensive, obscene, indecent, discriminatory, or harassing. Any individual found to have breached the University's conditions and accessed such material will be subject to further investigation under this or another University policy or procedure, and may be reported to the police.

9.6. Insurance

The University's insurance covers most of the risks likely to be involved in activities involving children. However, specific activity and event organisers should contact the Management Accountant in the Finance Department for confirmation that their activities are appropriately covered.

9.7. Photography and film

Written consent to take and use images of children should be obtained prior to the taking of photographs and/or video footage. Parents/guardians must be made aware of when, where and how the images may be used and their intended audiences in order that they can give informed consent. Where there is a reasonable expectation of observation (e.g. in research), written consent may not always be needed. Security footage is also excluded from the need for written consent.

9.8. Children as participants in research

Procedures to be followed if children are to participate in research projects are outlined in the University's [Ethics Guidelines](#).

10. Safeguarding arrangements for student and apprentice placements

10.1. Whilst engaged in university activities, students or apprentices may come into contact with children or adults at risk, for example, when they are on placement or visiting a setting as part of their programme of studies.

10.2. Programme Leaders will ensure that:

10.2.1. appropriate DBS checks are made regarding students and apprentices in such situations;

10.2.2. the students and apprentices are informed about the requirements of this Safeguarding Policy and of the setting in which their placement will be undertaken, including who they should contact should any issues arise;

10.2.3. the students and apprentices have undertaken appropriate Safeguarding

Awareness Training and;

- 10.2.4. any students and apprentices who enter placement settings in childcare provision have a duty to disclose if they are disqualified under the 2018 Childcare Disqualification Regulations. Further information on the staff to whom these Regulations apply, the checks that should be carried out, and the recording of those checks can be found in Disqualification under the Childcare Act 2006 statutory [guidance](#).
- 10.3. The University requires that all settings that receive students and apprentices as part of University activities have a Safeguarding Policy in place.
- 10.4. If a student or apprentice has safeguarding concerns while on placement, they should immediately report these to the Designated Safeguarding Lead of the setting and to a Designated Safeguarding Lead or Deputy at the University by emailing safeguarding@roehampton.ac.uk. The student or apprentice should also notify the senior academic staff member who is supporting the practice setting, aligning with the [Raising Concerns Procedure](#).

11. Recruitment, vetting and training of staff

- 11.1. Decisions regarding which staff roles require a DBS check are made by the Human Resources Department based on information provided by line managers (See Section 7 and Appendix C). Staff roles which may require a DBS check include:
- Staff working with children and adults at risk.
 - Counsellors, and any others providing treatment, therapy, emotional and wellbeing support as part of the remit of their role or healthcare (and their managers).
 - Specialist disability advisers (and their managers), NMH Mentors, Tutors and Learning Support Assistants providing 1:1 support.
 - Tutors and supervisors on summer schools for under 18-year participants, and their managers.
 - Staff who carry out frequent, unsupervised outreach work in schools.
 - Research staff and PhD students involved in supervising children or adults at risk in the course of conducting the research.
 - Staff who hold alcohol licences.
- 11.2. The University takes all appropriate steps to safeguard children or adults at risk and ensure that the appropriate staff are recruited using a safer recruitment approach, including the following:
- applicants in applicable roles complete an enhanced Disclosure and Barring Service (DBS) Check.
 - applicants complete an application form which ensures that there are no unexplained career gaps.
 - at least one interviewer on a panel has undertaken safer recruitment training in the last three years.
- 11.3. The University complies with its ongoing duty to notify DBS with any relevant information regarding the conduct of any individual which the University considers having caused harm or posing a risk of harm to groups at risk.

11.4. Staff duty to notify

All staff engaged in Regulated Activity undergo compulsory DBS checks, and are obliged to notify the University of any post-employment criminal convictions or cautions that may impact upon their future employment with the University. If staff members are found to be in breach of this obligation, disciplinary action may be taken with potential sanctions including summary dismissal.

11.5. Training & Support

- The University provides a copy of this policy and procedure in induction packs for all new staff.
- The University provides training, including regarding child and adults at risk protection and health and safety guidance, to all relevant staff, students, apprentices and volunteers upon appointment.
- Safeguarding training for all staff is mandatory, including updates every two years.
- Designated Safeguarding Leads or Deputy DSLs offer advice on request.
- Safer Recruitment training is mandatory for all those who interview staff or students who will need a DBS check as part of their employment every two years.

12. Recognising potential abuse or neglect

There are a number of ways in which abuse of a child or adult at risk can become apparent:

- A child or adult at risk discloses abuse or neglect.
- A third party discloses that a child or adult at risk has told them that abuse or neglect is taking place.
- A child or adult at risk shows signs of physical injury for which there appears to be no satisfactory explanation.
- A child or adult at risk's behaviour leads to suspicion that they are being, or have been, abused or neglected.
- A member of staff's behaviour in the way in which they relate to a child or adult at risk causes concern.

13. Responding to safeguarding concerns

13.1. The University will respond in an appropriate, proportionate and timely way to suspicions or allegations of abuse and neglect.

13.2. If staff, in the course of their work at the University, have a safeguarding issue brought to their notice, or observe an instance of abuse or neglect themselves, or have cause for concern, they must treat this as a priority and address the issue immediately. All members of the University have a duty to raise concerns, without prejudice to their own position, about behaviour by staff, managers, volunteers, students, apprentices or others. Staff, other than the Designated Safeguarding Leads, should recognise that it is their duty to inform but not to investigate.

13.3. Staff are required to report any incident of abuse or cause for concern which arises in the course of their work with children and adults at risk. This must be done immediately to a Designated Safeguarding Lead or their Deputy. The following list gives examples of incidents which are required to be reported. It is not exhaustive:

- 13.3.1. A child or adult at risk is accidentally hurt.
- 13.3.2. There is concern that a relationship is developing which may be an abuse of trust whereby there is a risk of a child or adult at risk being taken advantage of or abused/neglected.
- 13.3.3. A member of staff is worried that a child or adult at risk is becoming attracted to them or a colleague; or a member of staff is becoming attracted to someone in their care.
- 13.3.4. A child or adult at risk displays inappropriate sexually explicit behaviour or sexual awareness.
- 13.3.5. A member of staff believes a child or adult at risk has misinterpreted or misunderstood something that has happened or something that a colleague has done.
- 13.3.6. A member of staff notices any suspicious marks on a child or adult at risk or

receives a report/hears of an allegation of abuse from a child or adult at risk regarding events outside the University.

13.3.7. A member of staff, or a colleague, has had to use reasonable physical restraint to prevent a child or adult at risk harming themselves or another, or from causing significant damage to property.

13.3.8. There is suspicion, or an allegation is made, of abuse.

13.4. If there is an immediate risk of significant harm and emergency medical treatment is required, security or 999 should be contacted urgently.

13.5. Any suspicions or allegations should be reported to a Designated Safeguarding Lead (or Deputy) who will investigate the matter and determine an appropriate course of action, including contacting external authorities where this is indicated.

13.6. Disclosing abuse is difficult for a variety of reasons. Some children and adults at risk do not disclose because they feel they will not be believed or be taken seriously. It is very important that staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure.

DO	DO NOT
Stay calm	Panic or delay
Recognise your feelings, but keep them to yourself	Over-react
Use language that the person can understand	Use jargon or express opinions
Reassure the person: • they have done the right thing telling you • they are not to blame • you believe they are telling the truth	Probe deeply for information Use leading questions
Listen carefully, record what the person says and keep these notes	Make them repeat the story
Explain what you will do next (i.e. tell the Designated Safeguarding Lead (or Deputy) in a simple and clear way	Promise unconditional confidentiality
Follow the procedure outlined in informing a Designated Safeguarding Lead (or Deputy), and seek advice and support for yourself	Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than a Designated Safeguarding Lead

13.7. The procedure below must be followed whenever an allegation is made that a child or adult at risk has been abused or there is a suspicion that this may have occurred, whatever your personal feelings.

13.8. The procedure below must also be followed if allegations or suspicions of abuse are made against a staff member of the University at work or in a private capacity; against someone not directly connected to the University; against another child or adult at risk; or if the suspected or alleged abuse is taking place outside the University.

13.9. Staff, students, apprentices and volunteers should also follow the procedure below for any suspected or alleged abuse, even if it appears insignificant. There may be other undisclosed aspects of abuse which, when considered together, may add up to a more serious concern.

14. Procedure

- 14.1. Make a detailed written record of the matter and report it without delay to a Designated Safeguarding Lead or Deputy. If the allegation concerns someone who is not a student or apprentice, this should be the Director of Human Resources. If the allegation concerns a student or apprentice, this should be the Head of Wellbeing.
- 14.2. The Designated Safeguarding Lead will inform the Principal Safeguarding Officer, where necessary, and will investigate the matter, consulting with relevant internal departments and external agencies as appropriate.
- 14.3. If a member of staff feels that they or other members of the University may be at risk from being the subject of or exposed to accusations in connection with children, students or apprentices who are adults at risk, they should immediately alert their Dean of School/ Faculty or line manager and email safeguarding@roehampton.ac.uk.
- 14.4. If an allegation is raised against a member of staff, student or apprentice they may be informed of the allegation, on the advice of the Local Authority and/or police, and may be removed from contact with children and adults at risk in line with the appropriate disciplinary process (staff or student or apprentice).
- 14.5. Any internal disciplinary action arising from an investigation will be handled in accordance with the relevant disciplinary process (staff or student or apprentice).
- 14.6. If the matter is the subject of a criminal investigation or child protection services:
 - The University is entitled to pursue its own or complementary confidential enquiries and disciplinary action and the Principal Safeguarding Officer will consult with the relevant agencies in such cases.
 - Following an investigation, disciplinary action may be taken as appropriate.
- 14.7. Information is shared and discussed between staff and relevant agencies on a need-to-act basis only.
- 14.8. The written record of the matter will be retained by the Principal Safeguarding Officer.

15. Compliance with these procedures

- 15.1. The University expects staff and all those contributing to its activities to follow the requirements of this policy and procedure and to promote a safe environment in which the welfare of children and adults at risk is protected and promoted.
- 15.2. Failure to follow this policy and procedure may not constitute abuse but is nonetheless a matter of concern for the University and may lead to disciplinary action.
- 15.3. If members of staff, students, apprentices or volunteers are concerned that the guidance and procedures are not being followed, they should raise it with a Designated Safeguarding Lead or their Deputy. If they are not satisfied with the actions of the Principal Safeguarding Officer they can make a report under our Public Interest Disclosure Policy, or raise their concern with the police or social services.

Appendix A: Underpinning Legislative Framework

The guidance and legislative framework that underpins this document includes:

- Children Act 1989, 2004
- Care Act 2014
- Children and Social Work Act 2017
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Statement of Government Policy on Adult Safeguarding 2011
- Protection of Freedoms Act 2012
- Multi-agency practice guidelines: Handling cases of Forced Marriage 2014
- Mandatory reporting of Female Genital Mutilation 2016
- Keeping Children Safe in Education 2024
- United Nations Convention on the Rights of the Child 1989

Implementation

Depending upon the circumstances of the safeguarding issue, this document may be used in conjunction with other relevant guidance:

- Apprentices' Handbook
- Data Protection Policy
- Disability Policy
- Equality, Diversity and Inclusion Policy
- Employment Policies and Procedures
- Research Integrity & Ethics Committee Guidelines for Research, Practice and Teaching
- Support and Fitness to Study Policy
- Fitness to Practise Policy
- Freedom of Information Policy
- Health, Safety and Welfare Policy
- IT Policies and Conditions of Use
- Lone Working Policy
- Risk Management Policy
- Security Policy
- Admissions Policy
- Dignity and Respect Policy
- Freedom of Speech Code of Practice
- Student Code of Conduct and Disciplinary Procedure
- Student Contract
- Professional Boundaries and Personal Relationships Policy
- Student Mental Health Policy

Appendix B: Definitions and Indicators of Abuse

Child Safeguarding

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. Abuse can take a number of forms, which are not mutually exclusive. It can include direct ill-treatment or the impairment of health or development through neglect. 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. They may be abused by an adult or adults, or another child or children. For the purposes of safeguarding children, there are four categories of abuse: physical; sexual abuse and exploitation; neglect; emotional.

AI-generated material: the use of AI to generate child sexual abuse material (CSAM) is on the rise. The possession or creation of such images constitutes a criminal offence under the Protection of Children Act 1978, the Criminal Justice Act 1988, and the Sexual Offences Act 2003, and will be treated by the University in the same way as other forms of CSAM.

Adult Safeguarding

Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to both prevent and respond to risks and the experience of abuse or neglect, while at the same time making sure the adult's wellbeing is promoted, including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding any action. Safeguarding adults at risk involves reducing or preventing the risk of significant harm in relation to neglect or abuse, while also supporting people to maintain control of their own lives.

Adult at risk

An adult at risk is someone over the age of 18 who:

- has needs for care and support (whether or not the local authority is meeting any of those needs),
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Physical abuse

Hitting, pushing, scalding, hair pulling, shaking, pinching, kicking, misuse of medicines, restraint, or inappropriate sanctions.

Indicators of physical abuse (non-accidental injuries):

Injuries in unusual positions (i.e. back, buttocks, behind ears, genitals etc); injuries inconsistent with the age, ability or lifestyle of the person; apparent finger marks, slap marks, bite marks, burns and fractures on the body, etc.

Sexual abuse and exploitation

Rape and sexual assault, sexual acts to which the adult has not consented, or could not consent, or was pressured into consenting.

Sexual exploitation is when an individual or group takes advantage of a child to coerce, manipulate or deceive them into sexual activity.

Indicators of sexual abuse:

Detailed sexual knowledge inappropriate to the age of the child; sexually explicit language and behaviour; increased frequency of visits to the toilet and bed wetting; behaviour that is

excessively affectionate or sexual towards others; pregnancy, sexually transmitted diseases, indecent assault, loss of sleep; fear of medical examinations and being alone.

Indicators of child sexual exploitation:

Appearing regularly with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections or pregnancies; changes in emotional well-being; misuse of drugs and alcohol; going missing for periods of time or regularly coming home late; regularly missing school or not taking part in education

Emotional abuse

Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, bullying, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or being prevented/withdrawn from receiving services or supportive networks.

Indicators of emotional abuse:

Physical, mental and emotional developmental delays, difficulties with trust and affection; negativity, hopelessness and negative view of themselves, family and society; lack of empathy, compassion and remorse; changes in appetite, poor concentration, difficulty making friends, unexplained fear.

Neglect

Not meeting appropriate medical or physical care needs, or withholding the necessities of life such as food, heating and medicines which causes the person to suffer.

Indicators of neglect:

Failure to thrive and poor hygiene; constant hunger, tiredness and malnutrition; frequent accidental injuries, illnesses and untreated medical problems; developmental delays, poor state of clothing and low self-esteem; treated differently to others by their carer.

Self-Neglect

Self-neglect covers a wide range of behaviour with a person failing to care for their personal hygiene, health or surroundings.

Indicators of self-neglect:

Very poor personal hygiene; lack of essential food, clothing or shelter; malnutrition and/or dehydration; neglecting household maintenance; collecting a large number of animals in inappropriate conditions; non-compliance with health or care services; inability or unwillingness to take medication or treat illness or injury.

Financial abuse

Theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Indicators of financial abuse:

Unexplained sudden inability to pay bills or maintain lifestyle; unusual or inappropriate bank account activity; withholding money; recent change of deeds or title of property; unusual interest shown by family or others in the individual's assets; the person managing financial affairs is evasive or uncooperative; fraud or intimidation in connection with wills and property.

Discriminatory Abuse

Any abuse or harassment because of a person's race, gender, sexuality, disability or age.

Indicators of discriminatory abuse:

Lack of respect shown to an individual; signs of a sub-standard service offered to an individual; repeated exclusion from rights afforded to citizens such as health, education, employment, criminal justice and civic status.

Institutional/Organisational Abuse

Abuse as a result of persistently poor care or a rigid and oppressive regime.

Indicators of institutional/organisational abuse:

Repeated failures on the part of an organisation, despite warnings and agreement to improve; routine acceptance of poor practice; lack of individual care plans; inappropriate physical intervention.

An act of abuse can often fall under more than one type of abuse.

The University recognises a broad range of safeguarding responsibilities, including abuse as defined above, but also in relation to matters such as preventing radicalisation.

Appendix C: Defining Regulated Activity

The following information assists in defining whether a role requires a DBS check. Line Managers should provide this information to the HR Department to enable decisions regarding staff DBS checks to be made.

Does the job role or activity involve:

Y/N

One-to-one, frequent or overnight, unsupervised contact with children or adult at risks?	
Provision of health care (physical, mental, counselling or therapy)?	
Provision of specialist disability advice?	
Physical assistance (e.g. with eating, drinking, toileting, washing, dressing) which is provided for reasons of age, illness or disability?	
Day to day management or supervision on a regular basis, of another person who is providing a regulated activity?	
For activity involving children only (Regulated Activity)	
Unsupervised teaching, training, care or supervision, where children are the main recipients?	
Overnight teaching, training, care or supervision, where children are the main recipients?	
Unsupervised advice or guidance on physical, emotional or educational wellbeing, which is provided mainly for children?	
Advice or guidance on physical, emotional or educational wellbeing, which is provided mainly for children?	
Activity in any of the following places: school, pupil referral unit, childcare premises, FE establishment mostly for children, children's detention centre, children's home, or children's centre?	
For activity involving adults only (Regulated Activity)	
The activities of Regulated Social Work?	
Day to day assistance in a person's household affairs required because of their age, illness or disability, and in relation to their cash, bills, or shopping?	
Power of attorney, mental health advocacy, and similar?	
Transporting a person because of their age, illness or disability to or from places where they receive health or personal care or social work?	

Further details are available at: <https://www.gov.uk/government/collections/dbs-eligibility-guidance>