



## Safeguarding Children and Adults at Risk Policy and Procedure

### **In an emergency:**

If a student, member of staff, or member of the public is in immediate danger or at risk of harm to themselves or others call security on 222 or emergency services on 999. You should inform the relevant Designated Safeguarding Lead as soon as possible:

**Chief Safeguarding Lead:** Fiona Ryland, Chief Operating Officer

[f.ryland@ucl.ac.uk](mailto:f.ryland@ucl.ac.uk) 020 3108 7341 (Ext: 57341);

**Designated Student Safeguarding Lead:** Denise Long, Director of Student Support and Wellbeing [denise.long@ucl.ac.uk](mailto:denise.long@ucl.ac.uk) 020 3108 8936 (Ext: 58936)

### **Deputy Designated Student Safeguarding Leads:**

Lina Kamenova, Deputy Director of Student Support and Wellbeing

[l.kamenova@ucl.ac.uk](mailto:l.kamenova@ucl.ac.uk) 020 3108 8943 (Ext: 58943)

Natalie Humphrey, Head of Student Support and Wellbeing (Disability, Mental Health and Wellbeing) [n.humphrey@ucl.ac.uk](mailto:n.humphrey@ucl.ac.uk) 020 3108 6549 (Ext: 56549)

Mitesh Vagadia, Head of Student Support and Wellbeing (Development and Projects)

[m.vagadia@ucl.ac.uk](mailto:m.vagadia@ucl.ac.uk) 020 3108 8299 (Ext: 58299)

### **Designated Staff Safeguarding Lead:**

Donna Dalrymple, Director of HR Business Partnering

[d.dalrymple@ucl.ac.uk](mailto:d.dalrymple@ucl.ac.uk) 020 3108 8825 (Ext 58825)

### **Deputy Designated Staff Safeguarding Leads:**

Max Hill, Director of Workplace Health

[max.hill@ucl.ac.uk](mailto:max.hill@ucl.ac.uk) 020 3108 8795 (Ext 58795)

Claire Rowlinson, Head of HR [c.rowlinson@ucl.ac.uk](mailto:c.rowlinson@ucl.ac.uk) 020 3108 8854 (Ext: 58854)

Stuart McLellan, Head of HR [Stuart.mclellan@ucl.ac.uk](mailto:Stuart.mclellan@ucl.ac.uk) 020 3108 9903 (Ext: 59903)

# Safeguarding Children and Adults at Risk Policy and Procedure

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## 1. Introduction and Principles

UCL recognises that it has social, moral and legal obligations to safeguard the wellbeing and safety of children and adults at risk involved in any UCL activities, whether they are conducted in person or online.

## 2. Scope

This policy applies to:

- Children and adults at risk who are applying to become students at UCL;
- Registered students under the age of 18 and students who are adults at risk;
- Parents and guardians of applicants and students under 18 years of age;
- UCL staff who may be under 18 or an adult at risk;
- Any member of the UCL community who may come into contact with students who are under 18 or who are adults at risk;
- Research participants who are under 18 or who are adults at risk
- Employees, workers, volunteers or students who are accused of a safeguarding breach or concern (including in situations listed in section 3 below)

## 3. Out of Scope

- Any concerns relating to a child or adult at risk taking part in an activity run by the UCL Access and Widening Participation Office should be reported following the procedure in the UCL [Widening Participation Child Protection and Safeguarding Policy](#).
- Staff, students or volunteers who work with children or adults at risk in another organisation whilst representing UCL should follow the host organisation's safeguarding policy and procedures. (See also Section 19).
- UCL Day Nursery for children of staff and students has a safeguarding policy which can be found on their website <https://www.ucl.ac.uk/day-nursery/>.

## 4. Definitions

**A child** is defined as anyone under the age of 18. In this policy we also use the term 'young person' 'young worker' or 'young people' to refer to children aged 16 or 17 years old.

**An adult at risk** is someone aged 18 or over who receives or may need community care services because of a disability, age or illness and as a result of those needs is unable to take care of themselves or is unable to protect themselves against significant harm or exploitation. This can relate to physical, mental or psychological wellbeing or the potential to be drawn into sexual, financial or criminal exploitation and activity.

**Welfare concerns** include but are not limited to risk of suicide, self-harm, untreated mental health needs, going missing, domestic abuse, exploitation, serious self-neglect, risk of homelessness, or sexual abuse.

## 5. Safeguarding Roles and Responsibilities

5.1 The Designated Safeguarding Leads are responsible for:

- Reporting to and supporting the Chief Operations Officer about safeguarding matters;
- Reporting to the resident borough's children's services department where an allegation involves a student, employee or a research participant under the age of 18; or to the resident borough's adult social care department where an allegation involves an adult at risk;
- Monitoring, promoting and reviewing the policy, guidance documents and resources;
- Ensuring the dissemination of the policy to all UCL staff through forums, committees and stakeholder meetings;
- Acting as the first point of contact for safeguarding concerns and providing support;
- Reporting to the LADO (Local Authority Designated Officer) and seeking advice in situations where a safeguarding allegation is made against a member of staff;

- Providing support to, and dealing with any queries from, members of staff who have been accused of misconduct related to a safeguarding issue;
- Keeping records of all safeguarding referrals and outcomes;
- Working collaboratively with the Executive Director of Human Resources, Students Union UCL and UCL's network of safeguarding contacts.

## 5.2 UCL network of safeguarding contacts

In addition UCL has a [network of safeguarding contacts](#) within each Faculty who are responsible for:

- Monitoring the welfare of students who are aged under 18
- Ensuring safeguarding concerns are reported to a Designated Safeguarding Lead;
- Undertaking safeguarding training

## 5.3 All staff are responsible for:

- Being aware of the safeguarding policies pertinent to their role
- Reporting safeguarding concerns to the relevant Designated Safeguarding Lead

## 6. Staff Responsibilities and Conduct

People in positions of trust such as UCL employees, Principal Investigators, workers, volunteers, researchers, honorary roles (check w legal) student mentors and ambassadors must demonstrate exemplary behaviour. Remember that someone else might misinterpret your actions, no matter how well intentioned. You should always give due consideration as to what is an appropriate environment and what is appropriate conduct in relation to the activities you are undertaking.

### 6.1 You should:

- Follow the [Prevention of Bullying, Harassment and Sexual Misconduct Policy](#) and the [Personal Relationships Code](#).
- Act as an appropriate role model and provide an example you wish others to follow

- Challenge unacceptable behaviour by others including abusive youth/peer activities, bullying, harassment or sexual misconduct, including online behaviours
- Ensure feedback given in activities is constructive
- Avoid use of language, terminology or behaviour which could be interpreted as having a sexual connotation or innuendo
- Challenge the use of inappropriate or offensive language
- Consider the age of students or research participants when discussing sensitive issues, particularly if they are under 18

## 6.2 You should not:

- Engage in sexual behaviour with someone with whom you are in a position of trust. Whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act (2003) makes it a criminal offence for a person to engage in sexual activity of any kind with a person under the age of 18, where the adult is in a position of trust.
- Engage in private social media correspondence with a student or young person
- Do something for a child or adult at risk if they have the ability and capacity to do it for themselves. If somebody has a disability any tasks should only be done for them with their consent and their full understanding

## 6.3 You should not normally:

- Give a student or research participant your personal email address or personal social media contact details. You should give careful consideration before giving your personal mobile phone number out. Sometimes using your personal mobile may be unavoidable, for example when you are arranging and taking part in research, conferences or organising field trips. UCL communication channels such as UCL email, Microsoft Teams could be used as an alternative, but may not always be practicable.

## 7. Training and Support

## **7.1 For Staff**

For some roles at UCL safeguarding training is mandatory and must be completed before undertaking work in a position of trust. You will be notified if this applies to your role.

It is recommended that other staff complete the [Child Protection in Education](#) and the [Safeguarding Young People](#) online training course. To access these courses please email [osd@ucl.ac.uk](mailto:osd@ucl.ac.uk) asking them to set up your account.

All staff undertake [Prevent](#) training to safeguard staff and students from being drawn into terrorism.

## **7.2 For Students undertaking work involving contact with children and young people:**

Online training or face to face training will be given to UCL students.

## **7.3 For staff and students who have occasional contact with children and young people:**

You should be familiar with these guidelines and understand your responsibilities relating to safeguarding children and adults at risk. If you feel you would benefit from training you should contact:

i. For students [student.wellbeing@ucl.ac.uk](mailto:student.wellbeing@ucl.ac.uk)

ii. For staff HR Organisational Development [od@ucl.ac.uk](mailto:od@ucl.ac.uk)

## **8. Safeguarding Students Under 18 – Preventative Action**

### **8.1 Applicants who are Under 18**

Offers to applicants who will be under the age of 18 on joining UCL, are made on the understanding that they are equipped to study within an adult learning environment, and that they can act responsibly, appropriately and within the law and the [regulations](#) of UCL.

Students under 18 will be allocated a personal tutor who is the first point of contact for safeguarding or welfare concerns.

UCL does not act 'in loco parentis' and the ultimate responsibility for students under the age of 18 is with parents or those adults with parental responsibility.

It is mandatory for students under the age of 18 to provide their parent/s\* or legal guardian/s contact details and emergency contact details as part of the admissions processes at UCL.

Where parents are not resident within the Greater London area, it will be necessary to appoint a guardian for the student. The guardian is expected to reside in the Greater London area and may be a member of the family, a family friend that is known to the student, or an [AEGIS](#) accredited guardianship agency. The guardian must be made fully aware of their responsibilities by the family. Additionally, UCL expects the following of the guardian:

- to understand and accept the information provided in this policy
- to remain primarily responsible for the student's personal supervision and welfare
- to provide up to date and full contact details and take the role of a first emergency contact for the student if their emergency contact is not resident within the Greater London area
- to respond to communication from UCL and where appropriate accompany the student to induction sessions and meetings
- in the case of international students, to be involved in his/her travel arrangements and receive them on initial arrival in

## **8.2 Information Sharing**

Facilities and services for students at UCL are designed with a predominantly adult user group in mind. Therefore, it is assumed that students under 18 are competent to make decisions regarding their personal data and their consent is required, in the same way as for adults, with regard to any matters of data protection. In view of this, UCL will not ordinarily share or discuss personal information of students under 18 with any third parties, including parents or guardians, unless the student has given written consent or it is an emergency or a serious safeguarding concern.

The Designated Safeguarding Leads or Deputy Designated Safeguarding Leads will determine whether the safeguarding issue is considered serious or an emergency and whether the next of kin, parent/guardian and/or emergency contact should be contacted without consent.



### **8.3 Accommodation**

Within UCL managed student accommodation, students under 18 will be allocated places in designated halls.

Management teams and Student Residence Advisors (SRA's)/ Wardens of halls accommodating students under 18 will have the appropriate DBS checks and will have completed training in supporting and safeguarding students under 18.

Residence or House Managers carry out inductions with all under 18's when they arrive on site. If appropriate they will also carry out a risk assessment if an additional requirement has been identified, for example a personal emergency evacuation plan. The UCL accommodation office can be contacted on [accomodation@ucl.ac.uk](mailto:accomodation@ucl.ac.uk) and more information on accommodation

<https://www.ucl.ac.uk/accommodation/prospective-students/undergraduates>

### **8.4 Induction**

During induction week, students are made aware that they can contact Student Support and Wellbeing and/or a designated member of staff within their academic department for information and assistance.

### **8.5 Clubs and Societies**

Some activities, clubs and societies restrict access to students under 18. Further details can be found at <https://www.ucl.ac.uk/students/new-students/countdown-ucl/students-union-ucl>

### **8.6 Study and Social Events**

Some study and social activities may include off campus or overnight trips.

Participation of students under 18 in these activities are subject to risk assessment, which should be carried out by the person responsible for organising the event, and must abide by safeguarding protocols. Access and participation to some events may be restricted.

## **8.7 Non- Students Under 18 on Campus**

If a child is brought onto campus it is the responsibility of the person bringing them onto campus to ensure they are kept safe. If a student or staff member has a safeguarding concern about a member of the public, including research participants, they should contact a designated safeguarding officer.

Line managers must only offer under-18s work experience if it is organised via the school/college and the school's safeguarding procedures must be followed.

## **9. Safeguarding Adult Students at Risk – Preventative Action**

9.1 Through the individual academic departments and faculties, all students have access to a wide range of academic, English language (for students whose main language is not English) and pastoral support. UCL works closely with a GP practice which covers the local postcodes and can also see non-registered students as temporary patients if this is needed.

9.2 Through Student Support and Wellbeing, UCL provides effective support to any student who may be experiencing emotional and psychological problems. UCL also supports students who have longer term mental health conditions, physical disabilities and/or learning difficulties and are able to make reasonable adjustments for these students to ensure they can study as independently as possible during their time at UCL. Students can self-refer to Student Support and Wellbeing at any time.

<https://www.ucl.ac.uk/students/student-support-and-wellbeing>

9.3 UCL provides all new students with a 'Here to Support You' guide of support services available to them.

The support mentioned above is likely to be sufficient for most of UCL's students during most of their time at UCL. However, some students may have the potential to be/become an adult at risk (either temporarily or permanently) for a variety of reasons and in different situations during their time as a student at UCL.

9.4 An adult may become at risk during their time at UCL if they:

- Have particular needs because of their age;
- Have a disability;
- Have a physical or mental health difficulty

- Are detained in custody
- Are receiving community services because of their age, health or disability
- Are living in sheltered accommodation or in a residential care home

9.5 Adults as described above may not necessarily be at risk all of the time or at all. They may be at risk if they are not able to protect themselves against significant harm or exploitation.

9.6 It may be difficult to identify an applicant's or student's vulnerability or the possibility that they may become vulnerable to risk during their studies at UCL. Adults can also be victims of physical, emotional, sexual abuse or neglect. In addition, they can be vulnerable to financial, discriminatory or institutional abuse, modern slavery and self-neglect.

9.7 UCL has 100 [Wellbeing Champions](#), who have received training in mental health first aid and health and wellbeing, embedded across departments to support staff.

9.8 UCL registered students who are undertaking an international experience project abroad will be made aware of the support available centrally and locally. UCL provides the [Study Abroad Preparation Programme](#), as well as advice and support to students studying abroad and monitors situations in high risk areas via partners and the Home Office. Students can use the [Global Student Assistance Programme](#) and the [Healix Oracle app](#) to help ensure their safety and wellbeing whilst abroad. All UCL students participating in the Study Abroad programme are entitled to free medical and travel emergency insurance, to cover their time abroad.

## **10. Safeguarding Young Workers and Adult Staff at Risk – Preventative Action**

10.1 UCL is committed to ensuring a happy and healthy workplace. UCL has a [Wellbeing strategy](#) with a proactive approach to wellbeing by promoting and embedding positive physical, mental, social and wellbeing behaviours and activities across the UCL community.

- 10.2 The Workplace Health team provide a comprehensive occupational health service to assist UCL in promoting physical and psychological wellbeing and to help prevent illness and injury arising from work activity.
- 10.3 UCL provides a free and confidential [Employee Assistance Programme \(EAP\)](#), an independent provider of employee support services. The EAP employs professionally qualified Counsellors and Information Specialists, who are experienced in helping people to deal with all kinds of practical and emotional issues such as wellbeing, family matters, relationships, debt management, workplace issues, and much more.
- 10.4 In addition UCL's [Ways of Working](#) are embedded in all of our practices to ensure that all staff are accountable for reporting unacceptable behaviours.
- 10.5 UCL has 100 [Wellbeing Champions](#), who have received training in mental health first aid and health and wellbeing, embedded across departments to support staff.
- 10.6 Line managers are trained to consider whether reasonable adjustments are necessary to support a staff member experiencing mental health difficulties, including flexible working via the [Work-Life Balance Policy](#).
- 10.7 [UCL Report and Support](#) also provides an opportunity for support regarding any bullying, harassment or sexual misconduct experienced by the UCL community.

## **11. Recognising Concerns in a student, member of staff or a research participant**

- 11.1 Abuse is a form of maltreatment. Somebody may abuse or neglect a child or adult at risk by inflicting harm or by failing to act to prevent harm. Abuse may occur in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse may also take the form of self-harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- Abuse can take different forms and includes physical abuse, sexual abuse, emotional abuse and neglect. You may become aware of a concern through your own observations, something that someone else tells you about a child or something the child themselves tells you.

For full definitions, signs and indicators please refer to Appendix A

11.2 A member of staff could become an adult at risk at any time during their employment at UCL. Colleagues may notice a change in appearance or behaviour, attendance or performance. Whilst these do not necessarily indicate abuse or neglect, they may indicate a cause for concern.

Staff members who are concerned about a colleague's welfare or safety should let their colleague's line manager know.

11.3 Sometimes the behaviour of a colleague might cause concern or you may feel that circumstances that have arisen could lead you to be the subject of a false allegation relating to your conduct. This includes:

- A relationship developing which is an abuse of a position of trust
- A child or adult at risk is becoming attracted to a colleague
- A child or adult at risk is becoming attracted to you
- A child or adult at risk has misunderstood or misinterpreted something you have done or said
- Needing to physically restrain a child or adult at risk to prevent them from harming themselves or others or from causing significant damage to property

11.4 If you have concerns relating to staff behaviour for yourself or for a colleague you should discuss this with your line manager in the first instance. If the concern is about your line manager you should discuss it with their line manager.

## **12. Responding to someone who raises a concern**

If someone tells you directly about a concern relating to their safety **you should:**

- Remain calm
- Offer reassurance that they have done the right thing in telling you
- Listen attentively and show you are taking what you are being told seriously
- If they are under 18, explain that you have a responsibility to tell someone else about what you have been told because you want to keep them safe

- If they are an adult at risk, it is good practice to gain the person's consent to share your concern. If information has been shared with you in confidence, a safeguarding concern may mean that there is justification to share the information without consent. See section 21 for more information.
- Explain to them what will happen next

**Do not:**

- Interrupt or stop them from speaking freely
- React strongly for instance saying, "That's awful" or "How could someone do that?"
- Jump to conclusions about what happened or who is to blame
- Ask leading questions to gain more information; you can ask questions to clarify, for example "Are you telling me that...?" using their own words
- Promise confidentiality

## **13. Safeguarding allegations**

13.1 This is where a person has allegedly:

- a) Behaved in a way that has harmed a child or adult at risk, may have harmed a child or adult at risk or might lead to a child or adult at risk being harmed;
- b) Possibly committed or is planning to commit a criminal offence against a child or adult at risk or related to a child or adult at risk or;
- c) Behaved towards a child or adult at risk in a way that indicates they are or would be unsuitable to work with children or adult at risk.

13.2 The allegation may:

- Involve a child or children or adult/adults
- Not directly have an identified victim as such. For example, if someone is looking at abusive images of children online or using the internet to groom children with the intent to harm in future;
- Be about any type of abuse;
- Relate to a person who no longer works or studies at UCL (known as a 'historical non-recent allegation')
- Concern the child of a staff member or student
- Concern a child or an adult at risk who is a research participant

13.3 A safeguarding allegation may arise when:

- A child or adult at risk makes a disclosure about themselves
- A third party reports or makes an allegation about someone else
- Harmful behaviour is observed
- UCL is informed by the police or local authority or an individual that they are the subject of a child/adult protection and/or criminal investigation
- New information is contained in a Disclosure and Barring List (DBS) check

## **14. Historic /Non-Recent Allegations of Abuse**

Students or members of staff may disclose that they were the subject of historical abuse by someone external to UCL. Some allegations of historical abuse may raise concerns that others may be at risk. If the individual has provided sufficient information to identify the alleged perpetrator, UCL may have an obligation to share this information with the relevant authorities.

## **15. Recording and Reporting Concerns – Student under 18 or adult student at risk**

**15.1 As soon as possible after noticing or being told of a concern you must:**

- Record your concern using the Student of Concern form, providing as much detail as possible, following the guidance on the form.  
<https://www.ucl.ac.uk/students/support-and-wellbeing/if-you-are-concerned-about-student>
- Be precise and use their own words where possible
- You can give an opinion if it relates to their behaviour or demeanour if you note that it is your opinion
- If you are not able to access the online form then record your observations in writing, sign and date your record
- Send the form to Student Support and Wellbeing

**15.2 You should not:**

- Discuss the concern with anyone other than your line manager/head of department
- Investigate any allegations

### **15.3 After you have reported your concern:**

- Student Support and Wellbeing will let you know what will happen next
- You may ask for an update from Student Support and Wellbeing in relation to your report but bear in mind that information may be shared on a need to know basis.
- Hearing about suspected or actual abuse can be upsetting. If you need advice and support you can contact your line manager, the Wellbeing team, or the [Employee Assistance Programme](#). You can also contact NSPCC on 0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **15.4 Student Support and Wellbeing may decide to:**

- Contact the student to offer support
- Refer the student to internal support;
- Refer the student to an external support agency;
- Refer the student to children or adult social care where the child is resident
- Refer for consideration under alternative procedures such as Fitness to Study
- Contact the police if an emergency
- Call an ambulance if an emergency
- Contact the student's parent and/or guardian
- Contact the Designated Staff Safeguarding Lead and the Employee Relations team in HR (email [ercases@ucl.ac.uk](mailto:ercases@ucl.ac.uk) ) to report the allegations if they are against a staff member. The Designated Staff Safeguarding Lead will also contact Camden LADO within 24 hours to report the allegation.
- Contact the Disclosure and Barring Service under their legal duty to refer
- Contact the professional registration body for professional misconduct

## **16. Recording and Reporting Concerns – Young Workers or Adult staff at risk**

16.1 As soon as possible after noticing or being told of a serious concern about a member of staff who is a young worker or may be classed as an adult at risk you must:

- Make notes of your concern, providing as much detail as possible.
- Send the notes to Donna Dalrymple [d.dalrymple@ucl.ac.uk](mailto:d.dalrymple@ucl.ac.uk) , Director of HR Business Partnering, who is the designated staff safeguarding lead.



## **16.2 You should not:**

- Discuss the concern with anyone other than your line manager/head of department
- Attempt to investigate any allegations yourself

## **16.3 After you have reported your concern:**

- The Designated staff safeguarding lead will let you know what will happen next
- Hearing about suspected or actual abuse can be upsetting. If you need advice and support you can contact your line manager, the Wellbeing team, or the [Employee Assistance Programme](#).

## **16.4 The Designated staff safeguarding lead may decide to:**

- Contact the employee to offer support
- Refer the employee to internal support;
- Refer the employee to an external support agency;
- Refer the employee to adult social care
- Contact the police
- Call an ambulance
- Contact the employee's next of kin
- Contact the Disclosure and Barring Service under their legal duty to refer
- Contact the professional registration body for professional misconduct

16.5 If the allegations are against a UCL employee, the Designated Staff Safeguarding Lead will contact Camden LADO within 24 hours to report the allegations and will contact the Employee Relations team in HR. They will also offer support to the staff member who may have been accused of misconduct.

## **17. Recording and Reporting Concerns – Research Participants under 18 or adult at risk**

**17.1 As soon as possible after noticing or being told of a concern (that is not part of the research) you must:**

- Let your Principal Investigator / line manager/ head of department know immediately
- Record your concern, providing as much detail as possible
- Be precise and use their own words where possible
- You can give an opinion if it relates to their behaviour or demeanour if you note that it is your opinion
- If you are not able to access the online form then record your observations in writing, sign and date your record
- Send the form to Fiona Ryland, Chief Operating Officer, [f.ryland@ucl.ac.uk](mailto:f.ryland@ucl.ac.uk)

**17.2 You should not:**

- Discuss the concern with anyone other than your Principal Investigator / line manager/ head of department
- Investigate any allegations

**17.3 After you have reported your concern:**

- You may ask for an update in relation to your report but bear in mind that information may be shared on a need to know basis.
- Hearing about suspected or actual abuse can be upsetting. If you need advice and support you can contact your line manager, the Wellbeing team, or the [Employee Assistance Programme](#). You can also contact NSPCC on 0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**17.4 The Safeguarding Lead may decide to:**

- Contact the research participant to offer support
- Refer the research participant to an external support agency;
- Refer the research participant to children or adult social care where they are resident
- Contact the police if an emergency
- Contact the research participant's parent and/or guardian, if appropriate
- Contact the research funding body
- Contact the Designated Staff Safeguarding Lead and the Employee Relations team in HR (email [ercases@ucl.ac.uk](mailto:ercases@ucl.ac.uk) ) to report the allegations if they are against

a staff member. The Designated Staff Safeguarding Lead will also contact Camden LADO within 24 hours to report the allegation.

- Contact the Disclosure and Barring Service under their legal duty to refer
- Contact the professional registration body for professional misconduct

## **18. Managing Safeguarding Allegations against members of staff**

When an allegation is made against a member of staff, the Designated Staff Safeguarding Lead will:

- Report this to the Camden local authority designated officer (LADO) within 24 hours.
- Inform the Director of HR who will convene an Interim Measures Panel (see the Prevention of Bullying, Harassment and Sexual Misconduct Policy).
- Inform the Employee Relations team in HR who may initiate a formal [disciplinary investigation depending on police advice](#).
- Put in place support mechanisms to the employee accused of misconduct.

## **19. Prevent**

The Counter-Terrorism and Security Act 2015 (CTSA) created a statutory duty for specified public authorities to 'have due regard to the need to prevent people from being drawn into terrorism'. Prevent is one of four strands of the government's counter-terrorism strategy. Compliance with the duty in England is monitored by the Office for Students. [The UCL approach to Prevent](#) is primarily one of safeguarding the welfare of our students and staff. This is balanced against our commitment to freedom of speech and other key legislation.

## **20. Working with other organisations**

- 19.1 UCL may work with other organisations to deliver activities either on UCL premises or the premises of the other organisation. As part of these activities UCL will agree which organisation will take lead safeguarding responsibility. When planning to work with an external organisation UCL representatives ensure that they:

- Have the name and contact details of the other organisation's safeguarding lead
- Agree the process for reporting safeguarding concerns
- Agree responsibility for any risk assessments to be carried out
- Agree the responsibility for gaining consent and other permissions relating to confidential data
- Ensuring that staff have the appropriate training, qualifications and DBS clearance to work with children or adults at risk.

19.2 Where a UCL employee is accused of abuse the Designated Safeguarding Lead for staff will inform Camden Local Authority Designated Officer who will advise on who else should be informed if the employee also works somewhere else.

## **21. Record Keeping**

UCL will keep records of safeguarding concerns or allegations including details of how they were resolved, details of decisions reached and how those decisions were arrived at. These records will be kept securely for 6 years.

## **22. Confidentiality and Information Sharing**

21.1 UCL has a duty to share information with other agencies to safeguard children and adults at risk. UCL will seek consent from the reporting child or adult at risk before sharing the safeguarding information confidentially to an authority or agency. However, information may be shared without consent if UCL believes there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child or adult at risk in a timely manner. Data protection law and regulations should not be seen as a barrier to sharing information about safeguarding.

21.2 Where UCL decides to share information without consent there will be a record kept of the discussion and decision-making process to share that information. A legitimate interest assessment may be completed to fulfil this purpose:  
<https://www.ucl.ac.uk/data-protection/guidance-staff-students-and-researchers/practical-data-protection-guidance-notice/legitimate>

21.3 Information should be shared on a need to know basis only, as judged by the designated Safeguarding Leads and having taken advice from UCL's legal team.

## **23. Legislation and Guidance**

Children Act 1989

Data Protection Act 2018

Sexual Offences Act 2003

Children Act 2004

Safeguarding Vulnerable Groups Act 2006

Equality Act 2010

Protection of Freedoms Act 2012

Care Act 2014

Counter Terrorism and Security Act 2015

Working Together to Safeguarding Children (2018)

**October 2020**

## Appendices

### Appendix A Definitions and Indicators of Abuse

#### Abuse

A form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm, or by failing to act to prevent harm. Children or adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children or adults at risk may be abused by an adult or adults, or another child or children.

#### Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or an adult at risk.

#### Possible indicators are:

- Children or adults at risk with frequent injuries
- Children with unexplained or unusual fractures or broken bones
- Children with unexplained: bruises, cuts, burns, scalds, bite marks

More information: <https://learning.nspcc.org.uk/child-abuse-and-neglect/physical-abuse/>

#### Emotional Abuse/Psychological Abuse

The persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to the individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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. It may involve serious bullying (including cyber

bullying), 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 maltreatment of a child, though it may occur alone.

**Possible indicators are:**

- Lack of confidence or self-assurance
- Struggling to control their emotions
- Having difficulty making or maintaining relationships
- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends

More information: <https://learning.nspcc.org.uk/child-abuse-and-neglect/emotional-abuse/>

**Sexual Abuse**

Involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or adults at risk, in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Possible indicators are:**

- Displaying knowledge or interest in sexual acts inappropriate to their age
- Using sexual language or have sexual knowledge beyond their years
- Asking others to behave sexually or play sexual games
- Physical sexual health problems, sexually transmitted infections or underage pregnancy
- A change in behaviour such as becoming withdrawn or a change to their appearance
- It may be more difficult to identify possible indicators of abuse in adults than in children

More information: <https://learning.nspcc.org.uk/child-abuse-and-neglect/child-sexual-abuse/>

## **Child Sexual Exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Possible indicators are:**

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Changes in mental health and wellbeing
- Misuse of drugs and alcohol
- Missing from education

More information: <https://learning.nspcc.org.uk/child-abuse-and-neglect/child-sexual-exploitation/>

## **Neglect**

The persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of their 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:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. protect a child or adult at risk from physical and emotional harm or danger
- c. ensure adequate supervision (including the use of inadequate care-givers)
- d. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child or adult at risk's basic emotional needs.



**Possible indicators are:**

- Living in a home that is persistently dirty or unsafe
- Being hungry or dirty
- Being without adequate clothing for the weather conditions
- Living in dangerous conditions, i.e. around drugs, alcohol or violence
- Not receiving basic health care
- Parents who fail to seek medical treatment when their children are ill or are injured
- Children left in the care of unsuitable adults

More information: <https://learning.nspcc.org.uk/child-abuse-and-neglect/neglect/>

**Self-Neglect**

This covers a wide range of behaviours such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Possible indicators include:**

- Very poor personal hygiene.
- Unkempt appearance.
- Lack of essential food, clothing or shelter.
- Malnutrition and/or dehydration.
- Living in squalid or unsanitary conditions
- [Drug or alcohol misuse](#)

More information: <https://www.scie.org.uk/self-neglect/at-a-glance>

**Financial or material abuse**

This can include theft, fraud, internet scamming and the misuse or misappropriation of property, possessions or benefits. It also includes coercion in relation to an adult's financial affairs or arrangements, including wills, property, inheritance or financial transactions.

**Possible indicators include:**

- Unusual activity in the bank accounts.
- Unpaid bills.
- Unexplained shortage of money

More information: <https://www.anncrafttrust.org/what-is-financial-abuse/>

## **Domestic Abuse**

Domestic abuse is categorised by any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass physical, emotional, psychological, sexual and financial abuse.

### **Possible indicators include:**

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Fear of outside intervention
- Isolation from friends or family
- Limited access to money

More information: <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

## **Modern Slavery**

The term 'Modern Slavery' captures a whole range of types of exploitation, many of which occur together. These include but are not limited to:

- sexual exploitation
- domestic servitude
- forced labour
- criminal exploitation
- other forms of exploitation: organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.
- 

### **Possible indicators include:**

- Appearing to be under the control of someone else and reluctant to interact with others
- Having few personal belongings
- Not able to move around freely
- Reluctance to talk to strangers or the authorities
- Appearing frightened, withdrawn, or show signs of physical or psychological abuse

More information: <https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

### **Discriminatory Abuse**

Discriminatory and oppressive attitudes towards people on the grounds of disability, gender and gender identity and reassignment, age, race, religion or belief, sexual orientation, and political beliefs.

It may be a feature of any form of abuse and manifests itself as physical abuse/assault, sexual abuse/assault, financial abuse/theft, neglect and psychological abuse/harassment. It includes verbal abuse and racist, sexist, homophobic or ageist comments, or jokes or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support.

More information: <https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

### **Prevent**

The Prevent duty was introduced under the Counter Terrorism and Security Act (2015) so that education providers, including universities to have regard to the need to prevent people from being drawn into terrorism or extremism. This is sometimes referred to as being at risk of radicalisation.

### **Possible indicators include:**

- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Embracing conspiracy theories
- Changing friends and appearance
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups
- Violence or incitement to violence

### **Online behaviour**

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content

- Joining or trying to join an extremist organisation

For more information on UCL's approach to Prevent:

<https://www.ucl.ac.uk/srs/compliance/prevent-ucl>

More information on radicalisation and extremism:

<https://educateagainsthate.com/teachers/radicalisation-and-extremism/>