

## **St George’s, University of London**

## **Policy on Safeguarding Children and Vulnerable Adults**

## **January 2023**

**1. Introduction**

1.1 St. George’s, University of London is committed to ensuring a safe and supportive environment exists for all staff, students and visitors to the University. The University recognises that there are a number of circumstances in which children, young people and vulnerable adults will come onto University premises or otherwise have contact with University staff, students, contractors, and associated persons (such as staff of SGFT).

1.2 This Policy sets out the University’s approach to safeguarding children, young people and vulnerable adults in all university activities (both on and off campus). It reinforces the good practice already existing among most of its staff and students who are aware of safeguarding with most courses including explicit briefing in child and vulnerable adult safeguarding procedures. It is the responsibility of the relevant Professional Services or Institute Director, Dean or Head of Department or Service to ensure that local practice is in conformity with this Policy and that any relevant local guidance and/ or procedure documents are approved by the Dean for Welfare and Support as the University’s Senior Child and Vulnerable Adult Protection Officer.

1.3 The University recognises that the success of the Policy will depend on its effective implementation. To ensure the effective dissemination of this Policy, the Dean of Welfare and Support will arrange for training for key staff and others as is appropriate both in terms of which training is adequate and how frequently such training should be undertaken. For example, those named at the foot of this document will undergo the online NSPCC child protection course, this training must be undertaken or renewed every two years. The University will conduct audits of compliance with the Policy on a regular basis and seek to facilitate the sharing of best practice on child and vulnerable adult protection issues across the university.

1.4 This Policy will be reviewed after 12 months and thereafter every three years by the Dean for Welfare and Support, or authorised deputy, or more frequently as necessary.

**2. Scope of this Policy**

2.1 This Policy and the guidance established by it apply to all University activities involving children, young people under the age of 18 and vulnerable adults. This Policy applies to all staff and students of the University and to contractors engaged by the University who may come into contact with children or vulnerable adults as part of their work. For the avoidance of doubt it also applies to St. George’s Students’ Union unless otherwise provided elsewhere.

2.2 The University recognises that it has certain legal powers and duties to safeguard the welfare of children or vulnerable adults who come onto its premises or come into contact with its staff or students, including under the Health and Safety at Work etc Act 1974, Children Acts of 1989 and 2004, Education Act 2002, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, the Safeguarding Children and Safer Recruitment in Education guidance (2007) (as amended), Protection of Freedoms Act 2012 and, Working Together to Safeguard Children (March 2015) (as amended). Whilst some of the legislation does not directly affect Higher Education every adult member of the University community has statutory duties.

2.3 The University recognises its responsibilities to safeguard the welfare of children or vulnerable adults for whom it is responsible from time to time, and to work closely with statutory and voluntary local agencies to ensure that children or vulnerable adults are not at risk of harm or abuse. The University construes its safeguarding duty widely to include all manifestations of such harm or abuse howsoever arising.

2.4 The University is not responsible for ensuring the welfare of children or vulnerable adults who are present on the campus without the knowledge of appropriately authorised university staff.

**3. Areas of risk**

3.1. There are a number of activities undertaken or facilitated by the University which bring children or vulnerable adults into contact with University staff, students, contractors, or onto University premises. The following are identified as main activities which involve children or vulnerable adults:

* Widening participation/student recruitment activities such as organised visits, open   
   days and summer schools
* Children staying in Horton Halls;
* Children or vulnerable adults on the St. George’s campus (i.e. the whole hospital   
   premises not the parts that the University occupy);
* Children registered as students of the University;
* Children employed by the University;
* Children carrying out work experience at the University;
* Children or vulnerable adults that students or staff encounter in a clinical setting as   
   patients – whilst on placement students are subject to the safeguarding policy and   
   procedures of the placement provider (see section 12);
* Children or vulnerable adults that students or staff encounter as subjects of research   
   (see section 11)

This is not an exhaustive list.

**4. Child and Vulnerable Adult Protection Procedures**

***Reporting a safeguarding concern***

4.1 The flowchart below depicts the procedure to be followed by anyone who has a concern about a child or vulnerable adult. The Safeguarding Officers’ contact details can be found in Annex A, and the Record of Incident/ Concern form found in Annex B.

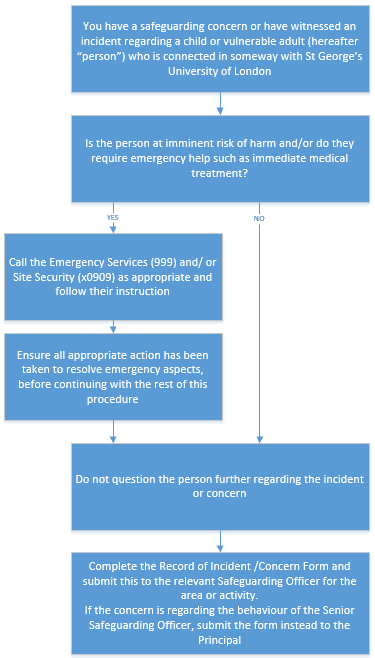


Figure 1- Process for reporting a safeguarding concern

4.2 After receiving a Record of Incident/ concern form, the Safeguarding Officer (or Principal) will take appropriate action to manage the case.

***Record Keeping***

4.3 Completed forms will be stored by the University as follows:

- Forms containing an allegation against a member of staff will be stored on the individual’s   
 staff file, by the Director of HR and OD at the request of the safeguarding officer managing the case, as the individual may be subject to the University’s Disciplinary Procedures (see 4.5).

- Forms containing an allegation against a student will be stored on the individual’s student file by the Head of Student Conduct and Compliance, at the request of the safeguarding officer managing the case (see 4.6).

- Forms containing a concern or incident regarding a child or vulnerable adult will be stored confidentially and securely by Governance, Legal and Assurance Services, at the request of the safeguarding officer managing the case.

4.4 Records will be kept for as long as necessary under the Data Protection Act, 2018. Any records found to be malicious or vexatious can be destroyed immediately.

***Person against whom an allegation has been made***

4.5 Where an allegation has been made against a member of staff, the Director of HR and OD may consider whether it is appropriate to invoke the Disciplinary Procedure.

4.6 Whereby an allegation has been made against a student, the Head of Student Conduct and Compliance may consider whether it is appropriate to invoke the Student Disciplinary Procedure.

4.7 The individual will be notified in writing if any such action is to be taken.

4.8 Wherever appropriate, the University will extend its support to the staff or student during investigations subsequent to the allegation, for example by keeping a line of communication open and/or signposting to appropriate sources of independent support e.g. Staff Unions or Counselling Service.

**5. Involvement of parents/legal guardians**

5.1 The University recognises the importance of ensuring that parents or legal guardians are fully aware of the activities and risks that their children may encounter at the University and will use its best endeavours to ensure that they are made aware and that consent is gained where reasonably appropriate.

5.2 Parents or guardians who bring children or vulnerable adults in their care on the campus (except to attend a University-led event) are at all times responsible for their safety and welfare and are obliged to ensure that the children or vulnerable adults in their care do not disturb others or damage University property.

**6. Disclosure and Barring Service (DBS) Police and Criminal Records check**

6.1 The University has a responsibility to take reasonable steps to ensure that its staff, students and contractors do not present a risk of harm to children or vulnerable adults. Where staff, students or contractors are likely to have substantial unsupervised contact with children or vulnerable adults the University may in its discretion, to the extent that the law permits, require them to disclose any police or criminal records they may have by undertaking a DBS check.

6.2 The University will act in accordance with the law, any DBS code of practice and best practice recommendations received from time to time, and will seek legal advice as necessary as to its powers to require DBS disclosures for particular posts or roles. However, as a minimum the University through the Human Resources Department will undertake DBS disclosures in respect of posts or roles which require them (typically those that involve regularly caring for, training, supervising or being in sole charge of those aged under 18 or vulnerable adults) and via Registry, will undertake DBS disclosures in respect of prospective students on courses which may involve child or vulnerable adult contact as part of the course

6.3 General guidance on the assessment of police and criminal records may be available from Registry or Human Resources for students and staff respectively. Some queries may be referred to the Governance Legal & Assurance Services department for legal advice.

6.4 The University recognises the need to take a proportionate approach to the issue of police and criminal records disclosures and understands that such sensitive personal information must and will be treated carefully and confidentially. Staff asked by outside bodies or individuals to undergo a DBS check prior to carrying out University business (e.g. a school visit) should seek advice from Human Resources.

6.5 The University may be legally required to make a referral to the DBS when a member of staff is dismissed or leaves following safeguarding allegations and where the DBS harm criteria is met.

**7. Health and safety**

7.1 The University seeks to ensure that it provides a safe working environment for all its staff, students and visitors. However, the campus presents additional hazards and risks to children, young persons and vulnerable adults so it is not possible for the University to guarantee the safety of children or vulnerable adults on all of its premises. Prior to authorisation for a child or young person to be on SGUL premises both the authorising person and host must ensure that they follow the SGUL ‘ Young Persons Risk Assessment Process’ and complete an SGUL ‘Young Persons Risk Assessment and Induction Checklist’. Both of these are available on the SGUL web pages. Such hazards and risks can be minimised through restricted access to hazardous areas (as detailed in 7.2), and through those responsible for the child or vulnerable adult ensuring that said child or vulnerable adult is appropriately supervised at all times.

7.2 Unless they are students of the University or members of staff, or are attending the University on duly authorised visits or activities, children under the age of 18 and vulnerable adults are prohibited from entering the dissection room and those laboratories, workshops and other premises which present particular hazards, as identified in the risk assessment or contain fragile or valuable equipment. They are also prohibited from engaging in any activity that cannot be reasonably adapted to meet any physical or psychological limitations they may have by virtue of their age or which may expose them to substances which are toxic or may cause cancer or may expose them to radiation or which involves extreme heat, noise or vibration. The use of cadavers for anatomical investigation is regulated by the Human Tissue Act (as amended) and therefore access to the Dissection Room is governed by Rules of the Dissecting Room, St George’s regulations and statute.

**8. Activities on campus**

***Events***

8.1Any event on campus (as well as events off-campus that will be associated with St George’s) must abide by either the Events and External Speaker and Visitor Policy (for Student-led events), or (for Staff-led events), as appropriate. Both policies consider the attendance of under 18s and/ or vulnerable adults at events and in some circumstances require event organisers to seek express permission to host the event where under 18s and/ or vulnerable adults will be present. Permission is sought via submission of an event request form which requires detail around the attendance of under 18s and/ or vulnerable adults and the safeguards the event organiser will put in place. The NSPCC website contains a “[Safeguarding checklist”](https://learning.nspcc.org.uk/safeguarding-checklist/?state=1#safe-activities) which event organisers may wish to use to inform what safeguarding measures they could put in place.

***Work experience for under 18s***

8.2 HR maintain a [Work Experience Guidance](https://portal.sgul.ac.uk/org/cs/hr/A-Z%20policies-and-procedures/work-experience-guidance.pdf/view?searchterm=work%20experience%20guidance) document, which staff should read prior to agreeing to host a work experience placement.

8.3 The Safety Health and Environment Office provide a [Young Person Risk Assessment and Induction Checklist](https://portal.sgul.ac.uk/she/young-person-risk-assessment-induction-checklist-october-2016.docx) which must be completed by the organisers of any work experience placements intended for under 18s and which either brings them onto the campus or into contact with University staff, students, contractors or associated persons. Advice should be sought from the Assistant Director Safety, Health & Environmental (SHE) as required.

8.4 Once completed, the risk assessment pro forma must be approved by the Assistant Director SHE *before* the activity is undertaken.

***Widening participation / student recruitment / admissions activities***

8.5 The widening participation and student recruitment team hold area-specific safeguarding guidance to complement this policy.

8.6 It is expected that for visits where members of staff from the visiting school/college/other organisation are in attendance, the visiting staff will have completed their own risk assessment and taken their own child protection steps in accordance with their own and local authority guidelines. The University’s event organisers must still satisfy themselves that appropriate measures are in place however, as it is no defence at law to avoid liability for prosecution by placing reliance on others to discharge the University’s duties on its behalf.

**9. Computing Services**

9.1. Internet filters are not routinely used when setting up IT accounts for staff and students because of the nature of academic activities undertaken at the University. Any internet use by U18s must be fully supervised.

9.2. The Computing Services Handbook is available here:

<https://www.sgul.ac.uk/about/our-professional-services/information-services/it-services>

**10. Students under 18**

10.1 Occasionally the University may admit an under 18-year-old to study at the University. in most cases that student will not be much younger than their cohort.

10.2 The suitability of a child under 18 for admission is a matter to be determined by the relevant Admissions Team, but once admitted as a student, the University has additional responsibilities to safeguard that student’s welfare on the grounds of their age. These responsibilities are subject to local procedures (such as accommodation policies for Horton Halls, and being on the licenced premises of the SU Bar). As a minimum the University will apply this Policy and consider the necessity of carrying out a risk assessment. Where appropriate local checklists will be in place and their implementation regularly audited by the relevant Director or Head to ensure compliance.

**11. Participation in research**

11.1 The University’s staff and students undertake research studies (including clinical trials) which can involve children and/or vulnerable adults.

11.2 All research studies involving human participants, their tissue and/or data is subject to approval from the Health Research Authority (HRA). The HRA’s review will include any impact on children or vulnerable adults prior to giving approval for the research to commence. The approval of a parent or legal guardian is generally required for children under the age of 16 and vulnerable adults (and those aged 16 or 17 deemed to be vulnerable).

11.3 Enhanced DBS checks are required for staff and students working with children and/or their data. For joint/NHS honorary clinical appointments, this would be carried out by the appropriate NHS Trust (usually SGFT); for other staff and students this would be carried out by the University’s HR when the staff member or student obtains a ‘research passport’.

**12. Teaching activities in clinical settings**

12.1 Students on clinical placements are subject to their placement provider’s policies and procedures regarding child and vulnerable adult safeguarding.

**13. Concerns or complaints about the implementation of this Policy**

13.1. The University and its staff are committed to dealing with you fairly and in accordance with this policy.

13.2. If you are unhappy about the way in which the University has applied this policy, you can raise it informally with the person who you were dealing with in the first instance, for example if you are attending a Widening Participation event then you would raise your concern with the event organiser. If matters concerning the way in which the policy has been applied are still not satisfactorily resolved, then you can express your dissatisfaction to the appropriate Safeguarding Lead. Contact details are set out in Annex A.

**14.** **Data Protection**The University complies with the principles of the Data Protection Act 2018 (DPA18) in all its processing of personal data.

In line with the relevant University policies and procedures, anyone responsible for managing the personal data of children or vulnerable adults will be expected to:

* complete a Data Protection Impact Assessment (DPIA) before collecting and processing any personal data;
* establish and document the lawful basis or bases for the processing of any personal or special category data;
* comply with DPA18 requirements regarding the obtaining of consent from children;
* pay special attention to the language used when collecting data from children or vulnerable adults, specifically when communicating the uses of their personal data and their rights in respect of this, e.g. via a Privacy Notice;
* ensure that appropriate access and security controls are in place to protect the confidentiality of personal data;
* only retain records containing personal data for as long as is necessary and according to the University’s records retention schedules;
* dispose of records containing personal data in accordance with the University’s Retention and Disposal Policy.

The Data Protection Officer will be contacted where further advice and guidance are required on the processing of either safeguarding data or the personal data of children and vulnerable adults.

**14. Implementation** (Approved by Senate: 24.02.2014)

Reviewed: 22.09.2015 (to update contact details on page 6, and include paragraph 8.5.)

Reviewed: 22.09.2016 (to update contact details on page 6)

Reviewed: 03.10.2017 (to update contact details on pages 6 & removed reference to INTO)

Reviewed: 09.07.2018 (to update legislation on page 1, ownership of policy on page 5 and contact details on page 6)

Reviewed: 30.01.2019 (to include vulnerable adults in the scope of the policy, update safeguarding officers’ contact details, include link to NSPCC checklist in reference to organising events, include reference to research activities and to include the procedure for reporting an incident/ concern).

Reviewed: 01.12.2019 (to include data protection information and to update safeguarding officers’ contact details)

Reviewed: 07.02.2020 (to include details of how often safeguarding training should be undertaken/renewed)

Reviewed 23.07.2021 (to update safeguarding officers’ contact details)

Reviewed 09.03.2022 (to update safeguarding officers’ contact details)

Reviewed 01.12.2022 (to update DSL and Students’ Union Safeguarding Officer)

Ownership: Dean of Students and Head of Student Recruitment & Widening Participation (in External Relations, Communications & Marketing)

**St George’s, University of London’s Safeguarding Officers**

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| --- | --- |
| Senior Child and Vulnerable Adult Safeguarding Officer: | **Dr Jane Cronin-Davis**  Dean for Welfare and Support  [jacronin@sgul.ac.uk](mailto:jacronin@sgul.ac.uk) |
| a) Widening Participation activities | **Head of Student Recruitment & Widening Participation**  Head of Student Recruitment and Widening Participation  [nahussai@sgul.ac.uk](mailto:nahussai@sgul.ac.uk) |
| b) Student Recruitment activities | As for (a) above |
| c) Admissions interviews | **Jennifer Laws**  Academic Registrar  020 8725 5024  [jlaws@sgul.ac.uk](mailto:jlaws@sgul.ac.uk) |
| d) The support of SGUL students under 18 | As for (c) above |
| e) Students’ Union societies and community projects | **Dr Jane Cronin-Davis**  Dean for Welfare and Support  [jacronin@sgul.ac.uk](mailto:jacronin@sgul.ac.uk) |
| f) Work experience placements/attachments (in any professional services directorate and/or institute of the university) | **Jenny Winters**  Director of HR & OD  020 8725 5128  [jwinters@sgul.ac.uk](mailto:jwinters@sgul.ac.uk) |
| g) On-campus teaching activity involving children or vulnerable adults | **Jennifer Laws**  Academic Registrar  020 8725 5024  [jlaws@sgul.ac.uk](mailto:jlaws@sgul.ac.uk) |
| h) Contractors and sub-contractors | **Elizabeth Gilby**  Facilities Manager  020 8725 5006  [egilby@sgul.ac.uk](mailto:egilby@sgul.ac.uk) |
| i) Children of staff and/or students on campus | **Elizabeth Gilby**  Facilities Manager  020 8725 5006  [egilby@sgul.ac.uk](mailto:egilby@sgul.ac.uk) |
| j) Visitors to SGUL (including trespassers) | As for (i) above. |
| k) Research activity involving children or vulnerable adults | **Mark Cranmer**  Director of the Joint Research & Enterprise Services  020 8725 4376  [mcranmer@sgul.ac.uk](mailto:mcranmer@sgul.ac.uk) |
| l) Activity on SGUL teaching placements | **Rachel Allen**  Academic Lead for Quality and Partnerships  [rallen@sgul.ac.uk](mailto:rallen@sgul.ac.uk) |
| m) Activity on FHSCE teaching placements | As for (l) above. |
| n) Public & Civic Engagement - STEM Network | **Carol Shiels**  Lead for Public and Civic Engagement  [cshiels@sgul.ac.uk](mailto:cshiels@sgul.ac.uk) |

# Record of Safeguarding Incident/ Concern Form

|  |  |
| --- | --- |
| Date and Time of Initial Report | DD/MM/YYYY at HH:MM |
| Record Submitted To | *Insert Name of Safeguarding Officer* |

|  |  |  |
| --- | --- | --- |
| Name and contact details of Child or Vulnerable Adult about whom there is a concern | Location of incident or cause for concern, if relevant | Any other parties involved  (adult or child) |
|  |  |  |

|  |  |
| --- | --- |
| Name/s of people present |  |

**Details of incident/concern**

Please give as much information about the incident and/or your concern as possible, being specific with the details. If you suspect abuse, please record what alerted your attention to the situation. Please include names of all the people involved.

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If you have additionally reported this incident/ concern elsewhere, please provide details below including date and time of report, who to (individual or organisation’s name) and how (i.e. by email, in person).

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|  |

**Details of person reporting incident/concern**

|  |  |
| --- | --- |
| Name (in block capitals) |  |
| Signature |  |
| Date |  |
| Role (e.g. student ambassador, supervisory adult) |  |
| Phone number |  |
| Email address |  |

**Once completed, please submit this form to the relevant Safeguarding Officer.**

**A list of the University’s Safeguarding Officers and their contact details are provided in Annex A of the Policy on Safeguarding Children and Vulnerable Adults**