

King's College London Safeguarding Policy

Policy Category:	General
Subject	Safeguarding
Approving Authority:	University Executive
Responsible Officer:	President & Principal
Responsible Office:	Students & Education Directorate
Related Procedures:	(1) Safeguarding Roles and Responsibilities (2) Online Safeguarding (3) Reporting a Safeguarding Concern (4) Safeguarding Protocol for International Projects, Research and Partnerships (5) Sharing Information with External Partners regarding a Safeguarding Concern (Student) (6) Sharing Information with External Partners regarding a Safeguarding Concern (Staff) (8) Prolonged Lack of Contact Guidance (9) Home Visit Procedure (10) Student Trusted Contact Procedure (11) Missing Persons Procedure Student of Concern Procedure Safeguarding Glossary
Related College Policies:	See section 15, below
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I. PURPOSE & SCOPE

This policy sets out the University's duty to safeguard any Child or Adult at risk who either applies and is admitted as a student to King's College London, **or** who comes into contact with King's College London activities (see clause 1.3) This policy applies to:

- All University staff, students (including student ambassadors), freelance practitioners, alumni, volunteers and any associated personnel representing the University, such as contractors.
- Any activity organised and/or delivered by King's College London, regardless of where the activity takes place and whether it is a part of collaborative provision arrangements.
- Any visitors to University campuses. This includes but is not limited to: academic staff attending conference events on King's premises, unpaid teaching opportunities, or visiting lecturers.

A whole University approach is taken to our policy and practice, embedding a culture of Safeguarding in everything we do and ensuring the welfare of Children, Adults at risk, and all students is paramount.

The University does not act *in loco parentis* (in place of a parent) for any student or staff member; however, in legal terms, we recognise the duty to safeguard the welfare of Children and Adults at Risk, as defined in the [Safeguarding Vulnerable Groups Act 2006](#).

The University recognises that some Adults may have an appointed representative e.g. mental health advocate, legal/enduring power of attorney.

This policy does not cover:

- Relationships between staff and students (this is dealt with under the [Policy for Relationships between Staff and Students](#))
- Sexual harassment or bullying in the workplace (this is dealt with under the [Dignity at King's – Prevention of Bullying & Harassment Policy](#) and the [Equality, Diversity & Inclusion Policy](#))

II. DEFINITIONS

King's College London has a responsibility to safeguard the welfare of both Children and Adults at risk. These groups can be defined as:

Adult at Risk: Any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.¹

Age of Consent: In the UK, a person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the Sexual Offences Act 2003 for an Adult in a position of trust to engage in sexual activity with a person under the age of 18. Staff employed by the University are in a position of trust when working with Children and Young People. The [Policy for Relationships between Staff and Students](#) outlines the University's position on relationships between members of staff and students at King's College

¹ NHS England, '[Safeguarding Adults](#)' 2017.

London. It is intended to ensure that professional boundaries are in place to safeguard student welfare.

- Child/Children:** A person/people under the age of 18.
- Pupil/Pupils:** A person or people under the age of 18 enrolled at an external educational institution. The Widening Participation team often engage with Pupils as part of their outreach programme, and Pupils are invited to visit the University campus.
- Safeguarding:** Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring. Protecting people, especially Adults at Risk and Children, from that harm; and responding appropriately when harm does occur. Safeguarding applies consistently and without exception across our programmes, partners, students, volunteers and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having robust accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect the subjects of investigations until the outcome of the investigation has occurred.
- Young People:** Children who are 16 or 17 years old.

For the purpose of this document, the 'University' is King's College London. Further definitions on regulated activity and types of abuse/harm/exploitation can be found in the [Safeguarding Glossary](#).

For the purpose of this document, all references to 'staff' include freelance practitioners, and any associated personnel who are acting as representatives or on behalf of the University, such as alumni volunteers. It also includes those who hold dual roles, as both students and staff members (e.g. Graduate Teaching Assistants).

III. POLICY

1. Introduction

- 1.1. This policy sets out the University's duty to safeguard any Child or Adult at Risk who either applies and is admitted as a student to King's College London, or who comes into contact/engages with King's College London activity.
- 1.2. The policy provides information to enable staff and students to identify instances in which there are grounds for concern about the welfare of a Child or Adult at Risk, whether arising from home, community or the University environment, and to understand the appropriate actions to take to keep them safe.
- 1.3. King's College London is a diverse and predominantly adult learning environment. However, there are circumstances when Children (including young people) and Adults at Risk may interact with staff and students at the University. These include, but are not limited to:
 - Teaching, supervision and student support both in person or via online delivery
 - Summer schools, school visits, and other events, such as, work experience
 - King's Pre-University summer programmes
 - Outreach or widening participation activities taking place on or off campus or online
 - Student residences
 - Research subjects
 - Events and conferences

- Placements and other professional and clinical settings
- Field trips, excursions and other volunteering activities
- International activities, such as, clinical placements, research, and King's Global Health Partnerships
- Alumni volunteering activities, such as, speakers at events and mentoring

1.4. This policy should be read in conjunction with the University's policies, procedures and guidelines referred to within this Policy. Specific areas of activity, for example, admission of students, clinical placements, the governance of research, and the organisation of summer schools have local procedures designed to promote Safeguarding practices.

1.5. This policy also supports and interacts with the University's approach to the Prevent Duty – supporting and safeguarding students who may be at risk of being drawn into terrorism ([Counter-Terrorism and Border Security Act 2019](#))². The risk of being drawn into terrorist ideologies is a significant Safeguarding concern alongside other forms of abuse and mistreatment of Children and Adults at Risk. Concerns in this area should be managed in line with this policy.

1.6. For matters relating to activity led by the King's College London Students' Union (KCLSU), the KCLSU Designated Safeguarding Officer is the Deputy Chief Executive. Where issues arise that are relevant to the Students' Union and the University, the organisations will work together to address these issues.

2. Legal Context

2.1 This policy and related King's College London procedures are informed by a collection of legislation and guidance on the protection of Children and Adults at Risk. This includes, but is not limited to:

- [Children Act 1989](#)
- [Children Act 2004](#)
- [Keeping Children Safe in Education 2023](#)
- [Working together to Safeguard Children 2023](#)
- [Safeguarding Policy: Protecting Vulnerable Adults](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Sexual Offences Act 2003](#)
- [Equality Act 2010](#)
- [Protection of Freedoms Act 2012](#)
- [Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\) Due Diligence Guidance for FCDO implementing partners 2022](#) (formerly the Enhanced Due Diligence: Safeguarding for External Partners)
- [Child Safeguarding Due Diligence: for external partners 2020](#)
- [Counter-Terrorism and Border Security Act 2019](#)
- [General Data Protection Regulation](#)
- [Health and Safety at Work Act 1974](#)

3. Responsibilities

University

² See the University's [approach to the Duty](#)

3.1 The University is responsible for ensuring appropriate policy, procedures, and risk assessment are in place to facilitate effective Safeguarding of Children and Adults at risk. This includes:

- Ensuring all people under the scope of this policy are formally provided with this document, continue to have access to it, and are familiar with their responsibilities;
- Undertaking due diligence on the Safeguarding policies of our funding partners before engaging with them, and support them to improve those if required;
- Ensuring that our contractors understand, accept and are responsible for their, or their employees' conduct in connection with, or in the vicinity of, vulnerable groups on University premises;
- Ensuring team members receive training on Safeguarding at a level appropriate to their role in the University.

3.2 The University will take all reports of Safeguarding concerns seriously and will respond to them promptly and according to due process. Information on the support provided by the University can be found primarily on the [Safeguarding intranet webpages](#), [Student Services Online](#), [Health and Safety, Report and Support](#) and [HR Staff webpages](#). Please note: there are certain Safeguarding concerns which the University is legally required to report on, such as: forced marriage; any student who is at potential risk of being drawn into terrorism (in line with the University's obligations under the Prevent Duty)³; and Female Genital Mutilation (FGM) as a suspected crime.

3.3 The University reserves the right to refuse to admit a Child or Adult at Risk to a programme of study, or other University managed activities, if it judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate.

Key Roles

3.4 The University has two Chief Safeguarding Officers (CSOs), Deputy-Chief Safeguarding Officers, Lead Safeguarding Officers (LSOs) and Designated Safeguarding Officers (DSOs). These Officers work with other agencies where appropriate to ensure legal and regulatory compliance and to achieve the aims of this policy. See [Procedure 1 - Safeguarding Roles and Responsibilities](#) for further information and the details of those in position.

3.5 All Designated and Lead Safeguarding Officers must be a minimum of a Grade 7 member of Professional Services staff⁴. These members of staff have overall responsibility for ensuring safeguarding duties are discharged in relation to their local area. Activities may be delegated to other members of staff as appropriate but ultimate responsibility and oversight remains with the Safeguarding Officer. Where the Grade 7 member of staff is unavailable or absent for any length of time, the responsibilities of that role will revert to their line manager and cannot be delegated to more junior members of staff.

Line Managers

3.6 Line managers are responsible for ensuring that appropriate DBS certificates are obtained for all staff or volunteers working in 'regulated activity' and for ensuring staff have access to appropriate training to fulfil their role. The level of DBS check (basic, standard or enhanced) will be applied according to the requirements of the role. Please note: Repeat checks must be carried out every three years. Further

³ [Prevent Duty Guidance for Higher Education Institutions in England and Wales](#)

⁴ In some faculties, an academic member of staff may be assigned as a Designated Safeguarding Officer. This needs to be agreed by the Faculty Leadership team. The role holder must be comparable in seniority to the requirement outlined in 3.5 of this policy

information can be found in the HR DBS Policy.

All Staff

3.7 All staff are expected to:

- Be aware of, and comply with, this policy and the associated procedures, including any local Safeguarding protocols within their specific department or team;
- Undertake training associated with this policy for their role;
- Fully reflect Safeguarding responsibilities in event planning and risk assessments for University activities in accordance with [Health and Safety procedures](#). This includes all activity that sits outside regular teaching and learning programmes and which involves Children or Adults at Risk;
- Bring to their project/line manager's attention any concerns or queries over whether their work activities would require them to have an appropriate level of Disclosure and Barring Service (DBS) checks that allows them to work with Children and Adults at Risk;
- Report any concerns, suspicions or information regarding Safeguarding violations to the appropriate Lead Safeguarding Officer (see Procedure 1).
- Maintain confidentiality about any suspected or actual incidents involving the University, through the University's Safeguarding reporting system and whistleblowing arrangements, as required. Some staff and students may be required to make use of the Safeguarding reporting systems and whistleblowing arrangements in operation in other workplaces, placement providers and so on, where similar expectations of confidentiality would apply;
- Co-operate fully with internal or external investigations carried out into reported concerns.

Staff and Students in Professional, Clinical and Voluntary Settings, including international

3.8 The University has partnerships with a range of organisations locally, nationally and internationally that have their own policies and reporting procedures for managing Safeguarding issues.

3.9 Students and staff members undertaking a professional, clinical or voluntary placement are responsible for familiarising themselves with the Safeguarding policy of the placement provider. Where a concern arises in such a setting, the Safeguarding procedures of that organisation should be followed in the first instance.

3.10 If an individual feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer, they do not feel they have had a satisfactory response, or the organisation does not have established Safeguarding mechanisms in place, the individual should refer the matter directly to the appropriate Lead Safeguarding Officer of King's College London.

3.11 Students and staff of King's College London who are based in an international setting for a placement, work or volunteer programme will continue to have access to University support services.

3.12 Students on placements, programmes of study or electives in low- or middle-income countries should familiarise themselves with this policy, particularly Section 5: Safeguarding in relation to International Projects, Research and Partnerships, and [Procedure 4 - Safeguarding Protocol for International Projects, Research and Partnerships](#).

3.13 Some programmes (e.g. in Law, Health) are required to be registered with or accredited by professional bodies, which have their own professional standards or fitness to practise regulations. For avoidance of doubt, this policy is complementary to, and does not replace, those standards and regulations.

Contractors' Staff Working on University Premises

- 3.14 It is the responsibility of the contractor who is the employer of any contract staff working on the University's premises to ensure that each individual has been recruited appropriately to the role they are undertaking, and that Disclosure and Barring Service (DBS) checks have been acquired for all appropriate roles in accordance with the eligibility criteria.
- 3.15 In line with the University's responsibilities as an employer and educator King's College London will request confirmation from the employer that each worker requiring a DBS check has had a check at the appropriate level. It is the responsibility of the hiring department to inform the contracting agency that a DBS check is required according to the needs of the post being recruited.
- 3.16 Any staff of a contractor whose role involves them having contact with Children or Adults at Risk in the course of their duties for the University must abide by this Safeguarding policy and associated procedural guidance of the University and may be required to attend appropriate training.

4. Safeguarding Students

- 4.1 The University takes a risk management approach to Safeguarding when organising learning and teaching and delivery of services to students and the public. University Faculties and Departments are required to carry out a risk assessment in respect of activities that involve Children or Adults at Risk and make reasonable, proportionate adaptations to those activities. A template risk assessment can be found on the [Safeguarding Resources](#) intranet webpage.
- 4.2 Although in terms of Local Authority and legal definitions of vulnerability, the majority of students aged 18 and over will not meet the formal Safeguarding threshold, the University clearly defines our duty of care to all of our students (see [King's College London Statement on our duty of care to students](#) . The University expects that our staff team will ensure that any student experiencing difficulty will be guided to appropriate support services so that their case can be managed appropriately.
- 4.3 Any student who considers that they have been subject to inappropriate behaviour or abuse has access to the Bullying & Harassment Policy and can seek additional guidance on [King's Student Services Online](#), from [KCLSU Advice](#) and [KCLSU Wellbeing](#) webpages, and Report + Support webpages.

Students Under the Age of 18

- 4.4 An application to study at the University from applicants who will be aged under 18 years before the start of their programme of study will trigger the U18 admission process. The Under 18s Process flowchart (internal document) details the requirements that need to be satisfied in order for an offer to be made.
- 4.5 All applicants under the age of 16 must be interviewed by their Department/Faculty before their application can be processed. The Associate Director (Advice, Wellbeing & Welfare) or delegate will be in attendance for the interview. Staff conducting the interview can obtain advice and resources from the Admissions team and the Student Support and Wellbeing Services team. King's Foundations interview applicants under the age of 17. Further information on the purpose of the interviews can be found in the [Admissions Interview Policy](#) and the [Admissions Interview Procedure for Under 16s](#). The University does not act *in loco parentis* (in place of a parent) for any student or staff member; however, in legal terms we recognise the duty to safeguard the welfare of Children and Adults at Risk, as defined in the [Safeguarding Vulnerable Groups Act 2006](#).
- 4.6 All students who are aged 16 or 17 at the point they enrol must live in a King's College London residence, unless it has been arranged in advance with King's Residences for the student to live with a parent, legal

guardian or UK-based guardian in the UK. Further information can be found in the King's Residences [Under 18 students in Residences Policy](#).

- 4.7 All students aged 15 or under are expected to live with a parent, legal guardian or UK-based guardian.
- 4.8 If any student under the age of 18 is found not to be in the required/previously agreed accommodation, the University will use the Trusted Contact Procedure to request confirmation from the student's trusted contact that they are aware of the student's accommodation. The University will require the trusted contact to provide written confirmation that they have approved of these arrangements.
- 4.9 All additional conditions must be met to the University's satisfaction before an applicant under the age of 16 will be admitted to the University.
- 4.10 Once students are enrolled, Faculty Designated Safeguarding Officers (DSOs) are required to complete a checklist for students under the age of 18, which includes providing confirmation that each of these students has had a DBS-checked Personal Tutor assigned to them and has met with them by the end of October. Further details on requirements can be found in the Faculty Safeguarding Responsibilities Checklist [link to be added]. DSOs must report on completion of this checklist twice yearly to the Safeguarding Oversight Group.

Outreach and Widening Participation

- 4.11 When visiting schools and further education colleges, staff and representatives of the University should ensure they are aware of the school or college's Safeguarding policies and procedures for the premises and the point of contact for raising Safeguarding concerns within the setting.
- 4.12 University staff are not expected to take responsibility for Pupils in other educational establishments. Pupils remain the responsibility of staff members of the respective organisation.
- 4.13 University staff should avoid situations where they might be left alone with Pupils from other institutions, ensure that the room/space is appropriate to the situation, and always offer the Pupil the choice to be accompanied by a person of their choosing.
- 4.14 Should it be necessary to report beyond the specific school, the county/region Local Authority Designated Officers (LADO) in social services should be contacted (in England).
- 4.15 For widening participation activities that involve unaccompanied young people (post-16) on King's premises, such as, summer school programmes, additional safeguarding procedures have been developed in line with this policy by the Social Mobility & Widening Participation team.

Students – Criminal Record Disclosures

- 4.16 Applicants for regulated programmes or modules that contain regulated activity are required to declare all unprotected criminal convictions or conditional cautions, pending police investigations or charges on application. If an applicant for a regulated programme or a module that contains regulated activity is convicted of a relevant criminal offence after submission of their application, they must inform the University at the earliest opportunity. Further information can be found in the [Criminal Record Disclosure Policy \(Student Admissions\)](#).
- 4.17 If the programme or module contains regulated activity, such as, requiring contact with Children or Adults at Risk, then a disclosure may be required from the Disclosure and Barring Service (DBS). Such programmes would include but is not limited to: nursing, midwifery, dentistry, medicine and other

courses involving work with Children and Adults at Risk.

- 4.18 King's Residences requires applicants to disclose any unspent, relevant criminal conviction(s) as part of an application to stay in halls of residence. This is to enable King's Residences to ensure the welfare of its staff and students and make a risk-based decision on whether there are reasonable grounds to exclude an applicant from admission to King's Residences, or to place any specific conditions on where they might live. The disclosure of any unspent, relevant criminal conviction(s) will not be an automatic bar to applying for King's Residences. Further information can be found in the [King's Residences Criminal Record Disclosure Procedure](#).
- 4.19 Applicants can seek further advice can be sought from the University's [Admission Office](#).
- 4.20 Any information provided will be treated in line with University's [Data Protection Policy](#).
- 4.21 Where a conviction is disclosed which indicates that the individual poses a risk to Children or Adults at Risk, the University has the right to deny admission to a student.
- 4.22 Enrolled students should refer to the [Non-Academic Misconduct Policy](#) for information on misconduct which is also a criminal offence, and the requirements for informing their faculty of any police investigation and/or any criminal or civil legal proceedings against them.

5. Safeguarding in relation to International Projects, Research and Partnerships

- 5.1 The University recognises our need to comply with all six standard areas of the Foreign, Commonwealth & Development Office's [Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\) Due Diligence Guidance for FCDO implementing partners 2022](#) as well as the UK Research and Innovation's policy on [Preventing Harm \(Safeguarding\) in Research and Innovation](#) and guidance from the [National Institute for Health Research](#), which supports compliance with Safeguarding clauses in research contracts. The University adopts a risk-based approach and has created [Procedure 4: Safeguarding Protocol for International Projects, Research and Partnerships](#) to address these expectations.
- 5.2 The Safeguarding Protocol covers:
- Staff, volunteers or affiliates contracted by King's (international and national).
 - Anyone engaged with work or visits related to King's, including but not limited to consultants, volunteers, contractors, and programme visitors.
 - Downstream partners or organisations or companies with whom we are working with who are also expected to adhere to international Safeguarding standards.
- 5.3 In each setting they visit, where possible, University representatives should make themselves aware of the local Safeguarding policies and procedures of the partner organisation, including the point of contact for raising concerns.
- 5.4 All staff and volunteers involved in King's Global Health Partnerships (KGHP) are required to sign the KGHP Code of Conduct for international activity, which includes Safeguarding obligations. By signing those agreements, team members agree to the Code of Conduct in addition to other codes specific to individual projects.
- 5.5 Students on placements, programmes of study or electives in low or middle-income countries should familiarise themselves with [Procedure 4 - Safeguarding Protocol for International Projects, Research and Partnerships](#) and seek further support from their Faculty where necessary.

6. Safeguarding – Other Groups

- 6.1. Where Children are present on the University estate or premises used by the University, they remain the responsibility of their parent/guardian, teachers or organiser of the activity, unless they are enrolled as students, or are otherwise involved in a University-managed activity, such as research or widening participation activities. If individuals under the age of 18 are employed by the University, particularly as part of apprenticeship programmes, hiring managers should refer to the [Health & Safety Internal Webpages](#) and the [Arrangements in Respect of Safety of Children and Young Persons on University Premises](#).

Working with Vulnerable Groups in Research

- 6.2. All research activities undertaken by staff and students involving human subjects are undertaken in a way that safeguards the dignity, rights, health, safety, and privacy of those involved.
- 6.3. Ethical clearance is required for all primary data collection involving human participants and certain types of research involving pre-existing human data/tissues. For all research involving children and young people, please refer to the guidance on internal Research Ethics webpage on [Research involving children & young people](#).
- 6.4. All research involving vulnerable groups, including those in low or middle-income countries, must be approved by one of the College Research Ethics Committee (CREC) sub-committees and must comply with the University's [Research Ethics Guidelines](#), the requirements of the Concordat to support Research Integrity as outlined in the [University's statement](#) and all relevant [Research Governance Support](#) where applicable.

7. Safeguarding in relation to Staff

Safeguarding staff who fall into the vulnerable group category

- 7.1 It is the general policy of the University to ensure that all employees who may be potentially vulnerable (e.g. survivors of violence or abuse; or individuals with a mental health diagnosis such that capacity is diminished) are given an appropriate level of support in our working environment.
- 7.2 Any employee who considers that they themselves may be an Adult at Risk, can seek support from their line manager or from their [HR Business Partner](#). The staff member may also seek additional help and guidance from their trade union. These sources of support are available equally to any member of staff who faces allegations of inappropriate behaviour, abuse and/or neglect.
- 7.3 Any staff member who considers that they have been subject to inappropriate behaviour or abuse also have access to the [Bullying & Harassment Policy](#) and can seek additional guidance on the [HR Intranet Pages](#), [Employee Assistance Programme](#), [Equality, Diversity & Inclusion](#) and [Report + Support](#) webpages.

8. Recruitment and Training

Recruitment and selection of staff and volunteers, including criminal convictions

- 8.1 Hiring/Line managers are responsible for ensuring that appropriate DBS certificates are obtained for all

staff or volunteers working in 'regulated activity'⁵. The level of DBS check (basic, standard or enhanced) will be applied according to the requirements of the role. The University will evaluate information about an individual's criminal record, and make reasonable, fair and consistent judgements about whether the individual is safe to engage (or remain engaged) in employment, role or office. **Please note:** Repeat checks must be carried out every three years. Further information can be found in the [HR DBS Policy](#).

- 8.2 The Human Resources Directorate is responsible for maintaining dedicated procedures and providing support to hiring managers for ensuring that relevant staff obtain the appropriate level of DBS check in place.
- 8.3 Due to the nature of some University activities, such as King's Global Health Partnership Projects, and teaching students under the age of 18 in King's Foundations, additional recruitment processes are used to ensure stringent Safeguarding measures are deployed. These conditions include, but are not limited to:
- including references to Safeguarding procedures on recruitment documents;
 - reference requests that include enquiry about suitability to work with under 18s; note for King's Foundations staff, two references must be obtained and kept on file;
 - police or similar disclosure checks where available;
 - ensuring all team members are aware of codes of conduct as part of their onboarding;
 - Not allowing unsupervised activity with students under the age of 18 if a DBS check is delayed.
- 8.4 Many staff and volunteers are engaged in roles that are not 'regulated activity' but they undertake activities that may also involve Children or Adults at Risk. All staff are expected to follow the code of practice and maintain standards of conduct befitting those who are role models and influential figures in the lives of others. A [Code of Practice](#) is available on the Personal Tutor intranet pages.
- 8.5 The University reserves the right, in accordance with our employment procedures, to suspend and/or dismiss staff members from employment or from undertaking a specific role with respect to that employment. This may be in circumstances where the individual acquires or extends a relevant criminal record, or where they have withheld information about their criminal records at the point of employment. Managers should seek advice from the relevant [HR Business Partner](#) for further advice where necessary.
- 8.6 Disciplinary action, up to and including dismissal, may also be taken against staff, in accordance with the University's employment procedures for a failure to comply with the requirement to declare criminal convictions.

Training

- 8.7 Safeguarding responsibilities are part of the University's recruitment and induction processes for all staff. The Safeguarding at King's e-module should be completed within the first two weeks of employment at King's.
- 8.8 In addition:
- All Safeguarding Officers as well as departmental staff who are likely to specifically work with Children or Young People (for example, the Widening Participation team and staff from King's Foundations), will be subject to Disclosure and Barring Service (DBS) checks and will receive

⁵ A definition of 'regulated activity' can be found in the Safeguarding Glossary

enhanced Child Protection training including information on recognising abuse. Further guidance can also be found in the Safeguarding Procedures and the [Resources](#) section of King's Safeguarding webpages.

- Personal Tutors are supported by a Senior Tutor Network and provided with online resources and guidance, which includes guidance on how to follow the Prolonged Lack of Contact and the Student of Concern Procedure. All Senior Tutors are required to attend face-to-face training.
- Staff at King's College London will also receive localised briefings delivered by their local Lead Safeguarding Officer, or exceptionally the Designated Safeguarding Officer where appropriate, to help them fulfil their Safeguarding responsibilities, particularly in those areas that have frequent contact with under 18-year olds.
- Students working to support activities with Children and Adults at Risk, for example as University ambassadors, will receive training in Safeguarding responsibilities and good practice.
- Any member of the University who will be planning activities with/for Children or Adults at Risk is required to undertake appropriate training. Staff members should contact their Designated Safeguarding Officer or the appropriate Lead Safeguarding Officer in the first instance.
- Staff can access guidance on good practice and the Safeguarding procedures in the [Resources](#) section of King's internal Safeguarding webpages; this includes advice on appropriate behaviour and interaction with students under the age of 18; spotting the signs and symptoms of abuse; and guidance on Safeguarding in an online environment.

9. Raising Concerns

- 9.1 It is a requirement that staff report any Safeguarding-related concern they have about any individual connected with the University or attending University activities or premises. All reports must be made to the appropriate Lead Safeguarding Officer as quickly as possible and within 24 hours. Refer to [Procedure 3 - Reporting a Safeguarding Concern](#) flowchart.
- 9.2 The [Student of Concern \(SOC\) Procedure](#) is the main route of referral for any Safeguarding concern about a student. The procedure allows for welfare concerns, including where there is a risk of an individual being drawn into terrorism, to be managed through a Safeguarding route. The indicators of abuse or harm or the risk of being drawn into terrorism can be very difficult to recognise and it is not a staff member's responsibility to decide whether a Child or Adult at Risk has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have.
- 9.3 An overview of Safeguarding reports made throughout the year is included in the annual Safeguarding Report, which is submitted to the College Council, as Trustees of the University.

10. Allegations

- 10.1 Feeling able to raise concerns is an important aspect of a safeguarded institution (whereby staff, students and volunteers are encouraged to share genuine concerns in confidence, with the relevant Lead Safeguarding Officer). In accordance with legislation and our policy⁶, the University will support and protect the individuals who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions. Staff who want access to free confidential

⁶ [Information Disclosure \(Whistleblowing\) Policy - King's College London \(kcl.ac.uk\)](#)

advice about whistleblowing can contact [Protect](#) (formerly Public Concern at Work).

- 10.2 Allegations against members of staff will be considered in accordance with the University's [Academic Staff Disciplinary Regulation](#) and [Disciplinary Policy and Procedure](#). In the case of serious allegations, initial duties of the staff member may be curtailed, or they may be suspended, while an investigation is underway.
- 10.3 Allegations against students will be considered in accordance with the University's [Non-Academic Misconduct Policy and Procedures](#).
- 10.4 For any allegations against students, staff or volunteers that relate to a Child under the age of 18, in line with Working Together 2018, the relevant Lead Safeguarding Officer will inform the appropriate LADO. This will be done in accordance with [Procedure 5 - Sharing Information with External Partners regarding a Safeguarding concern \(Student\)](#) and [Procedure 6 - Sharing Information with External Partners regarding a Safeguarding concern \(Staff\)](#). In these cases, the Lead Safeguarding Officer (Staff) and any other staff relevant to the investigation, will ensure full engagement with the process coordinated by the LADO.
- 10.5 The University recognises our responsibility to victims and survivors and will provide appropriate support to those individuals during and following the outcome of the investigation.
- 10.6 It will also seek to manage and minimise the stress inherent in circumstances where an allegation is made against a member of staff, student or volunteer. It is essential that any allegation of abuse made against a member of staff, student or volunteer is dealt with fairly, quickly and consistently, in a way that provides effective protection for the Child/Adult at Risk, and at the same time supports the person who is the subject of the allegation.
- 10.7 Where a crime is suspected of being committed, the University will involve the police.

Reporting to Statutory Bodies and Other Organisations

- 10.8 In line with the [Charity Commission Guidance on Reporting Serious Incidents](#), the University has a duty to report incidents of alleged or actual abuse or mistreatment that have resulted in or risk significant harm to the students or staff of the University or others who come into contact with King's through its work (the 'King's community'). As the University is an exempt charity, these reports must be made in the first instance to the University's principal regulator, which is the Office for Students, rather than directly to the Charity Commission. The Office for Students and any funder or accreditor of a King's College London project (e.g. the Foreign, Commonwealth & Development Office, the British Council, and other UK government bodies) will be notified if there has been any Safeguarding allegation or any breach of policy or procedure that puts a member of the King's community at significant risk of harm and will be informed of the action which the University proposes to take in response.
- 10.9 The relevant local authority (whether in the UK or elsewhere) and other relevant agencies, including the police in case of emergencies, will be notified if there are any allegations or incidences of Child abuse or mistreatment of members of the King's community, wherever it takes place, which may be criminal in nature.

11. Non-Compliance with the Safeguarding Policy

- 11.1 The University expects all University staff, students, and associated personnel representing the University or who contribute to its activities to follow the guidance on Safeguarding and to promote the

welfare of Children and Adults at Risk. Failure to follow this guidance and procedures may not necessarily constitute abuse, but it is nonetheless a matter of concern for the University and may lead to disciplinary action.

11.2 If an individual is concerned that another member of the King's Community is not following the guidance and procedures, they should contact their own project coordinator, line manager, local Designated Safeguarding Officer or Lead Safeguarding Officer. See [Procedure 1](#) for further information.

12. Information Sharing and Confidentiality

12.1 In general, information should only be shared with the consent of the subject of the information. However, as recognised in [Schedule 8 Safeguarding of Children and of individuals at risk of the Data Protection Act 2018](#), in some circumstances, it will be inappropriate to seek consent before sharing information with others and/or information can be shared where consent has been refused, for example:

- Emergency or life-threatening situations that place the Child, Adult or others at increased risk of significant harm; or
- Where seeking consent might undermine the prevention, detection or prosecution of a serious crime (i.e. any crime which causes or is likely to cause significant harm to a Child or to an Adult), or interfere with a potential investigation.

12.2 If an individual refuses intervention to support them with a Safeguarding concern, their wishes should be respected. However, there are circumstances where this request can reasonably be overridden, including:

- the individual lacks the mental capacity to make that decision – this must be explored and recorded in line with the [Mental Capacity Act 2005](#)
- other people are, or may be, at risk, including Children. This is particularly pertinent when dealing with disclosures about domestic abuse and violence
- sharing the information could prevent a crime
- an alleged abuser has care and support needs and may also be at risk
- a serious crime has been committed
- staff are implicated
- the person has the mental capacity to make decisions, but they may be under duress or being coerced to refuse intervention.

12.3 See [Procedure 5 – Sharing Information with External Partners regarding a Safeguarding concern \(Student\)](#) and [Procedure 6 – Sharing Information with External Partners regarding a Safeguarding concern \(Staff\)](#) for further detail on the process for sharing information with external partners.

12.4 In accordance with the [Student Trusted Contact Procedure](#), a decision will be made as to whether the next of kin, parent/guardian, and/or emergency contact should be contacted about a Safeguarding incident (based on seriousness, capacity of the person involved, and level of emergency). Consideration will be given as to whether consent can or should be requested, and any action required if it is not provided or available.

12.5 Further information and advice on sharing information within a Safeguarding context can be found in the [Information Sharing: Advice for Practitioners providing Safeguarding Services](#). More information on how the University manages personal data can be found in King's [Core Privacy Notice](#), [Student Data Collection Notice](#) and on King's Information Compliance team's [intranet pages](#).

13. Auto forwarding of Email Communication for Safeguarding Purposes

13.1 In cases where there are serious concerns regarding potential risk of harm to one or more people within the King's community due to the nature, volume, recipients or content of email communications from a particular individual, the University will consider whether it is appropriate to request that all email communication from that individual be auto forwarded to a designated mailbox. The purpose of this is to:

- Ensure that any information disclosed, particularly regarding mental health or welfare concerns, can be monitored by appropriate members of staff and acted upon in accordance with the assessed need and urgency;
- Prevent any delays to the provision of support which might occur if emails are sent to students or staff who are not best placed to assist in situations where there is a risk of harm to self or others;
- Prevent other members of the King's community, staff and students, from receiving email communication which may be distressing or harmful.

13.2 A request for an auto forwarding rule to be set up can be made by any member of King's staff, and should be made to the Associate Director of Student Conduct & Appeals, the Associate Director of Counselling & Mental Health Support, the Associate Director of Advice, Wellbeing & Welfare, or the Director of Student Support & Wellbeing Services.

13.3 The factors that will be considered include:

- How the individual specifically breaches of the University's [IT Acceptable Use Policy](#)
- The volume of emails sent (e.g. whether multiple emails are sent to the same or several recipients)
- The recipients of emails sent (e.g. whether emails are sent to large groups of staff and/or students)
- The content of emails (e.g. whether it might be reasonably foreseeable that the content would cause harm to prospective recipients).

It is anticipated that any request made would relate to a student who is already engaged with one or more of our supportive processes, including but not limited to: Support for Study, Student of Concern, Fitness to Practise, misconduct proceedings, etc.

13.4 The member of staff who receives the request will review the information provided and consider whether allowing the student's emails to continue without an auto forwarding rule in place presents a risk to the safety and welfare of that individual or that of others within the King's community. That decision will be made in line with the definition of Safeguarding as set out in section II of this policy.

13.5 If agreed, the request will be made to IT Services for an auto forwarding rule to be put in place. All emails to kcl.ac.uk addresses will be routed through to a designated mailbox for the purpose of monitoring and effective and timely response, as appropriate.

13.6 Any emails forwarded to this mailbox, which do not contain content that may cause harm to the individual or to others will be sent on to the intended recipient, once reviewed. Emails will be reviewed within no more than two working days of receipt.

13.7 A student will be informed by the Student Conduct & Appeals team that an auto forwarding rule has been set up for their email communications, except where to inform them of this is assessed as potentially increasing risk of harm to themselves or others.

13.8 The auto forwarding rule, and any associated decisions as to whether or not a student should be informed if that has not taken place, will be periodically reviewed. If it is determined that the risk of

harm has reduced, a further request will be made to IT services that the auto forwarding should be cancelled.

- 13.9 Auto forwarding normally applies only to kcl.ac.uk email addresses, but may also exceptionally be extended to personal email accounts where there is evidence that an individual has used their personal account to breach the [IT Acceptable Use Policy](#).

14. Policy Implementation and Review

- 14.1 It is the responsibility of the Safeguarding Oversight Group to review this policy annually. All versions will be dated, and approved versions signed by the Co-Chairs of the Safeguarding Oversight Group.
- 14.2 The University will further develop the policy where necessary in line with the changes in legislation and best practice guidance and following internal review of the effectiveness of existing procedures.
- 14.3 Any local procedures and codes of practice developed by a specific research group, Department, Faculty or Service will be subject to approval by the Safeguarding Oversight Group.

15. Links to related Policies and Procedures

[Academic Staff Disciplinary Regulation](#)

[College Research Ethics Committee \(CREC\) Guidance document](#)

[Criminal Record Disclosure Policy \(Student Admissions\)](#)

[Data Protection Policy](#)

[Dignity at King's Prevention of Bullying & Harassment Policy](#)

[Disciplinary Policy and Procedure](#) (Research, Teaching-only and Professional Services Staff)

[Equality, Diversity and Inclusion Policy](#)

[Freedom of Information Policy](#)

[Health and Safety Policy Statement](#)

[HR DBS Policy](#)

[Information Disclosure \(whistleblowing\) Policy](#)

[King's College London's Approach to the Prevent Duty](#)

[King's College London Statement on our duty of care to students](#)

[King's Residences Accommodation Policy](#)

[KCLSU Policy Zone](#)

[Non-Academic Misconduct Policy & Procedure](#)

[Relationships between Staff and Students Policy](#)

[Risk Management Policy](#)

[External Speakers Policy](#)

[Room Bookings: It's My Campus! Policy](#)

[Student of Concern Procedure](#)

[Summer Programmes Staff Handbook \(Internal link only\)](#)

[Support for Study Policy and Procedure](#)

[Terms and Conditions for Students](#)