



# **Safeguarding Policy and Procedure**

**2026 - 2027**

This document is available in hard copy and on the University intranet and internet sites. Please contact the Information Centre (in each campus library) or the Kingston Students' Union Advice Centre if you have any difficulty in obtaining a copy that you can read or find any aspect of these regulations difficult to understand.

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## Introduction

1. Kingston University is committed to ensuring the safety and wellbeing of all staff, students and visitors, and is aware of its legal duties to safeguard children, young people, and adults at risk. The University endeavors to provide a safe environment that is beneficial to work, study, and the enjoyment of a positive experience for all members of its community.
2. While all reasonable steps are taken to ensure the safety and welfare of all people during their studies and work, the University cannot take on the usual rights, responsibilities and authority of a parent or guardian and will never act in loco parentis.
3. The University will maintain the highest possible standards in meeting its responsibilities to protect and safeguard the welfare of children and adults at risk and is committed to working in partnership with other organisations (as appropriate) to facilitate this. This may include liaison with the Local Authority Designated Officer (LADO) as and when required in relation to safeguarding concerns.
4. Within the course of their activities, staff and students may encounter children (i.e., individuals who are under 18 years old) or adults at risk (i.e., those over 18 who are rendered vulnerable to harm or exploitation due to their personal situation and/or social circumstances). Staff and students supervising or undertaking outreach work with schools and colleges, or undertaking professional placements in clinical settings, health care, teaching and social care are likely to come into regular contact with children and adults at risk.
5. The minimum age for admittance onto a Kingston University course is 17 years at the time of enrolment. Admissions and safeguarding arrangements required for under 18s enrolled on University courses are outlined in section 6 of the [Admissions Policy \(AP1\)](#).
6. All University staff are in a position of trust, particularly those who teach, support, guide or in any way interact with students. It is incumbent on all staff to be aware of their safeguarding responsibilities and to act accordingly, including adhering to the University's [Personal Relationships Policy](#).
7. This is enabled through the provision of mandatory safeguarding training for all staff, and additional training for those in designated safeguarding roles.
8. In implementing this policy, the University is mindful of its general duty of care and other legal obligations under the Health and Safety at Work Act 1974, The Care Act 2014, the General Data Protection Regulation as enacted by the Data Protection Act 2004, safeguarding legislation such as the Safeguarding Vulnerable Groups Act 2006 and implementation of the Disclosure and Barring Service (DBS); the Children Act 2004, the Equality Act 2010, and the Counter Terrorism and Security Act 2015.

## Purpose

9. This document outlines Kingston University's commitment to safeguarding adults and children including an awareness of:
  - Legislative requirements and relevant institutional policies and procedures.
  - Preventative measures and good practice guidance.
  - Key roles and responsibilities for safeguarding at Kingston University.
  - How to raise a safeguarding concern about the welfare or wellbeing of an adult or child.
  - Safeguarding arrangements for activities taking place on or off campus, and online.
  - Confidentiality, data protection and freedom of speech in relation to safeguarding.
10. This Safeguarding Policy has been developed with reference to statutory guidance and other relevant University policies and resources.
11. The University recognises that the success of this policy will depend on its effective implementation. It will therefore ensure communication and dissemination of this policy within the University and to relevant third parties and will provide appropriate training and guidance for staff as outlined in paragraph 37.

## Applicability

12. This policy applies to all activities involving contact with children or adults at risk, including activities that take place on University premises, as part of off-site placements, within other off-site activities for which the University is responsible, and during activities delivered virtually via an online environment. It also forms part of our general duty of care to safeguard all students and staff.
13. Collaborative partner institutions, including apprenticeship employers, are expected to have their own safeguarding policies and procedures in place that they adhere to. The University's Student Safeguarding Manager will liaise with the partner organisation's safeguarding lead (or similar) in relation to student safeguarding concerns.
14. This policy applies to all Kingston University staff, applicants, students, apprentices, volunteers, representatives, governors, and visitors to the University. It covers the behaviour of:
  - staff to students
  - students to staff
  - student to student

- staff to staff
  - third parties to staff/students, staff/students to third parties including students on placement
  - third parties to other third parties but only where the activity has taken place on university premises and involves children or adults at risk. For example, concerns around safeguarding in connection with groups hiring rooms at the University.
15. This policy does not cover activities undertaken outside of the UK where different legislative frameworks apply, although staff should still be mindful of their responsibilities and may wish to refer to this policy as best practice. The policy also excludes safeguarding issues that arise as part of private agreements made outside of the University, for example between students and private halls of residence, private landlords or private counselling services. In such cases, the procedures of the organisation or appropriate professional body should be followed. However, the University may facilitate a referral to the local council where the alleged abuse took place, and in some cases may refer to this policy, e.g. where all parties involved are Kingston University students and/or staff.
16. Wellbeing support will always be offered to students and staff involved in a safeguarding matter that is reported to the University.

## Definitions

17. "Student" – refers to a person who is studying for an award of the University, including persons studying on courses delivered by collaborative partner institutions under a franchise arrangement, and persons studying on Higher or Degree Apprenticeship courses.
18. "Staff" refers to any permanent, fixed term, associate, temporary or other member of staff employed by the University, including student workers. This also includes contractors, for example skills tutors and specialist mentors.
19. "Child" is a person under the age of 18 years. The individual may be studying at or visiting the University, or a student may disclose a situation where a child (or children) is at risk of harm, for example, domestic abuse.
20. "Adult at risk" – the University bases its definition of "Adult at Risk" on that used within The Care Act 2014 which defines an Adult at Risk as any person aged 18 or over who is at risk of abuse or neglect due to their care and support needs. This includes individuals who may not be able to protect themselves from harm. More information is available here: [Abuse and neglect of adults at risk \(safeguarding\) - Social care and support guide - NHS](#)
21. "Safeguarding Children" – the University draws on the definition used by the DfE Keeping Children Safe in Education 2025 (KCSE). While KCSE only applies to Schools and Colleges, the University recognises the part it must play in:

- protecting children from maltreatment
  - preventing the impairment of children's mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes.
22. "Safeguarding Adults at Risk" – while the University is not subject to the provisions of the Care Act 2014, it draws broadly on this act to inform our approach to safeguarding Adults at Risk, recognising the part it must play in:
- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
  - Ensure that the wellbeing of an Adult at Risk is promoted and that in deciding on any action, where possible, we will consider their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

## Key Staff Responsibilities

23. **Student Safeguarding Manager (Lead Safeguarding Officer (LSO)):** has day-to-day responsibility for safeguarding students at Kingston University and will liaise with the relevant members of the safeguarding network to ensure safeguarding concerns are managed appropriately.
24. **Student Counselling and Wellbeing Manager (LSO):** oversees the work of the Student Safeguarding Manager.
25. **Associate Director of Student Life, Health and Wellbeing and Student Services Director (LSO's):** overall strategic responsibility for safeguarding students.
26. **Executive Director for Students:** Executive Officer with overall responsibility for student safeguarding at Kingston University
27. **Human Resources:** responsible for and will lead on safeguarding matters involving staff.

## Freedom of Speech within the Law

28. This policy is not intended to limit staff or students' freedom of expression within the law. The University is committed to upholding the right to lawful freedom of speech for its employees, students and visiting speakers.

## Preventative measures

29. **Staff recruitment:** The University will take appropriate steps in relation to the recruitment of staff, through conducting appropriate recruitment checks, such as DBS checks and enhanced DBS where necessary, to ensure that unsuitable people are prevented from working with children and adults at risk at Kingston University.
30. **Staff/Visitors under 18:** Any under 18s employed by the University, and children and young people on work experience or visiting the University, must have a risk assessment in place which details any risks associated with the activities they will undertake, and controls which have been put in place to mitigate these risks. It is the responsibility of Heads of Departments to ensure that a risk assessment is completed before offering work experience or inviting children on to campus.
31. **Students under 18:** The admissions and safeguarding arrangements for under 18s enrolled on university courses are outlined in section 6 of the Admissions Policy. It is the responsibility of Heads of Departments that admit students under the age of 18 onto their programmes to ensure safeguarding arrangements are adhered to.
32. **Placements:** Departments are responsible for managing their own safeguarding procedures and agreements with professional placement providers, which must be consistent with this policy. Students accepted onto programmes that include professional placements involving children and/or young people, are required to obtain a satisfactory enhanced disclosure from the DBS prior to enrolling / commencing the placement.
33. **Degree apprenticeship employers:** As set out in the Training Services Agreement (TSA), the employer must ensure that its employees, contractors and agents comply with the requirements of the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006 to the extent that these apply to the employer. The TSA also requires the employer to read and comply with the University's policy and guidance relating to safeguarding, including how to report any concerns to the designated safeguarding leads.
34. **Engagement of Contractors:** The engagement of contractors and other third parties to undertake work on behalf of the University is governed by procurement and tendering procedures. The University will ensure that contractors and others are appropriately selected in accordance with the relevant policies and procedures. The University reserves the right to request safeguarding policies and assurances from contractors at any time during their engagement.
35. **Guidance & Support for students:** This takes a variety of forms:
  - Advice to students is available through the University website and services offered within the Students Directorate, most significantly: the Student Safeguarding Manager, the Student Counselling and Wellbeing Team, the Mental Health and Disability team, the Student Advice Team and Information Centre staff. Students may also seek support from their

designated Personal Tutor or, in the case of higher or degree apprenticeships, allocated Skills Coaches.

- The Student Life, Health and Wellbeing team will ensure that all students are made aware of how to report concerns via campaigns and communications throughout the academic year. Departments are responsible for ensuring all students are made aware of the guidance and support available to them, as part of their academic course induction.
  - As part of efforts to foster a healthy and safe campus environment, they will also collaborate with Kingston Students' Union and appropriate external organisations to deliver events and activities that reinforce appropriate behaviours and provide information about reporting procedures and support available for students. This may include inviting external groups/speakers/organisations to share expertise and good practice.
36. **Guidance & Support for staff:** Advice and support for staff dealing with, or affected by safeguarding issues, is available via their Line Manager, [Human Resources](#), and/or the [Employee Assistance Programme](#). Guidance relating to Safeguarding is available here: [Safeguarding - Report + Support - Kingston University](#)
37. **Relevant Policies and Procedures:** The University has in place a range of policies and procedures that are relevant to the implementation of the Safeguarding Policy. These include the Whistleblowing Policy, Health & Safety policies; policies covering appropriate use of IT and social media; policies and guidelines relating to students on placement; policies and procedures for managing complaints, grievances, and disciplinary matters; Student Life policies; and the Personal Relationships Policy. Links to relevant policies and other resources are included in Appendix A.
38. **External agencies:** The University has established links with outside agencies including the NHS, police and local authorities, to support its safeguarding procedures and practice. It also engages with multi-agency partners as needed to ensure staff and students get the support they need, e.g. participation in MARAC meetings.
39. **Training and Promotion:** the University ensures that all staff are aware of their responsibilities through mandatory completion of Safeguarding and Prevent compliance training, and the provision of guidance for staff on actions to take when concerned about a student in a variety of situations. Additional, specialist training is provided for staff specific to their roles and responsibilities. Each year, new students are required to complete mandatory training on 'Creating a Culture of Safety and Respect' and 'Cyber Security and Data Protection' to help keep themselves and other safe, including online. Further resources and training are made available for those who wish to develop their knowledge further.
40. **Monitoring:** safeguarding reports are monitored during the year to identify emerging themes that may require a proactive intervention (e.g. communication to students about a potential risk such as financial fraud). Annual reports are prepared for internal committees, including data on the

number and type of reports received, to help improve practices and protect learners effectively.

## General good practice for staff

41. Everyone who works at Kingston University shares a responsibility for making the University a safe and secure environment. In addition to the guidance below, all staff are required to familiarise themselves with and adhere to the University's [Personal Relationships Policy](#).
42. Child protection and adult safeguarding should always override confidentiality, internal hierarchies, and other objectives. Staff should not collude with a student, parent, child, or another member of staff to keep concerns secret in areas of child protection or adults at risk. If an adult student lacks capacity, the Student Safeguarding Manager will determine whether to make a referral in liaison with other LSOs, and in consideration of wider public interest.
43. One-to-one meetings with students under the age of 18 should be avoided where possible, however can be undertaken if required with suitable arrangements in place as outlined in the section 6 of the University's [Admissions Policy \(AP1\)](#).
44. One-to-one meetings with a child or adult at risk, or meetings outside the normal teaching/office environment, should be conducted with due regard to the potential sensitivity of the situation.
45. Unnecessary physical contact with students should generally be avoided in the interest of all parties. Staff should also avoid non-work-related contact with students such as providing them with lifts home or to medical appointments. Whilst such gestures may be well intentioned, these acts may be misinterpreted.
46. Staff administering non-emergency first aid should ensure wherever possible that another member of staff is present if they are in any doubt whether physical contact could be misconstrued.
47. Care should always be exercised in the use of language. For example, unnecessary comments which could be interpreted as having a sexual connotation should be avoided.
48. The personal telephone number, personal email or home address of any staff member should never be given to students or children. It is recommended that staff always use the Teams telephony system to call a student. Where a staff member must use their own mobile to contact a student, they should withhold their number using 141 before dialling.
49. If a member of staff feels that they, or other members of the University, may be at risk of being the subject of, or exposed to unwarranted accusations in connection with children or students, they should alert their Head of Department or line manager.

## Reporting a safeguarding concern via Report & Support

50. All members of the University have a duty to raise safeguarding concerns, without prejudice to their own position, that involve staff, managers, volunteers, students, or others, whether these take place on the University premises or off site, and in a professional or private capacity. **Staff should recognise that it is their duty to report concerns but not to investigate.**
51. Detailed guidance for University staff on how to respond to concerns about a student in different situations is available on Staffspace (internal link): [Students of concern - guidance for staff](#)
52. In the course of their work at the University, if a staff member has a child protection or adult at risk issue brought to their notice, observe an instance of abuse themselves, or have cause for concern regarding the safety of a child or adult at risk, they must treat this as a priority and adhere to the reporting procedures set out below.
53. Safeguarding concerns about a student, staff member or visitor that do not require an immediate, emergency response should be reported using [Report & Support](#) within 24 hours. The relevant staff will assess risk and respond in an appropriate, proportionate, impartial, and timely way to suspicions or allegations involving any child or adult at risk. In all safeguarding cases accurate records will be maintained of allegations, concerns, decisions, actions and the reasons for these.
54. There may be circumstances when an emergency response is required due to serious concerns over the immediate safety of a person or persons. **In an emergency situation the staff member should contact emergency services on 999 and/or alert KUSCO Security on 020 8417 6666 (extension 6666).** This should take priority over all other duties. The incident should also be reported immediately using [Report & Support](#), including all available information and outlining any actions taken. Multiple reports may be submitted about a single incident. It is important not to assume that someone else has reported the matter.
55. The appropriate follow-up support or actions in response to reports received will depend on the nature of the incident and an assessment of risk. This will be determined by the Student Safeguarding Manager in liaison with the other LSOs and relevant external agencies as required.
56. If a student who is a child or adult at risk has an open case with external services, such a local authority, the Student Safeguarding Manager will provide regular updates to the local authority as appropriate. The Student Safeguarding Manager will liaise with the KU Cares team in relation to care leavers.
57. If a child is at immediate risk of harm, the Student Safeguarding Manager (or another LSO in their absence) should make immediate contact with the relevant Social Care team via telephone or appropriate referral forms, who will advise on the appropriate next steps.

58. If a concern or accusation is reported relating to a staff member, Human Resources will determine and lead next steps in line with the Disciplinary Procedure, Personal Relationships Policy and other relevant policies and procedures.

## **Harassment and Sexual Misconduct**

59. The University does not tolerate any form of harassment, bullying or sexual misconduct and any such allegations will be taken extremely seriously. Reports of harassment and sexual misconduct will be risk assessed and considered with reference to this and other relevant policies and procedures.
60. Support will be offered to all parties involved in reports of harassment, victimisation, hate crime, sexual misconduct, or violence, either that take place either on or outside the University campus.
61. Further information about the University's commitment to preventing and addressing harassment and sexual misconduct, how incidents can be reported, and the support available can be found here: [Harassment, bullying and sexual misconduct | Kingston University London](#)

## **Confidentiality**

62. Confidentiality is necessarily limited by the law and by relevant University policies. The University is subject to statutory requirements to disclose information to external agencies in specific circumstances. This may happen without the consent of the individual reporting a cause for concern.
63. Staff should never give assurance of confidentiality in relation to disclosures made to them by a student.

## **Concerns that relate to criminal matters**

64. The University reserves the right to report to the Police any incident that it believes may constitute a criminal offence based on an assessment of risk and the wider public interest. It should be noted that the University does not undertake criminal investigations and individuals who believe that they are the victim of a crime should be encouraged to report this to the police or other relevant authority.

## **Malicious allegations**

65. The University will seek to ensure that this policy is not used in a way which causes unwarranted detriment to others. The University will act when vexatious or malicious allegations are made, when false information is provided or when a complainant has otherwise acted in bad faith. In such circumstances, disciplinary action may be taken, and any investigation based upon those allegations may be terminated.

## **Person against who an allegation has been made**

66. In cases of alleged serious or gross misconduct by a staff member, the line manager should proceed directly to a formal investigation, in line with the Human Resources Disciplinary Procedure. Suspension may be considered for cases of alleged serious or gross misconduct. The Student Safeguarding Manager will work closely with the line manager and HR as part of any investigation involving a student, as appropriate
67. If the allegations involve another student, this would be investigated under the [Student Conduct and Behaviour Procedure](#). One or more precautionary measures may be put in place to safeguard all parties while any investigation takes place. Support would be offered to all parties during this procedure.

## **Involvement of parents and legal guardians**

68. Under data protection legislation the University has a duty to preserve the rights of individuals to privacy and confidentiality. The University will only disclose information regarding a student (including adults at risk or children) to third parties (including parents, guardians and emergency contacts) in accordance with its [privacy notices](#). In an emergency situation staff should prioritise contacting emergency services rather than the student's next of kin or emergency contact.
69. Information about a student's wellbeing or whereabouts, including their enrolment status, should not be disclosed to a third party without the student's explicit consent, except in cases where it is necessary to protect their vital interests, for example in a life-threatening emergency.
70. If a third party contacts the University because they are concerned about a student, unless there is an immediate risk to life, this should be reported following the detailed guidance available on Staffspace (internal link): [Students of concern - guidance for staff](#). Staff in Student Life, Health and Wellbeing will risk assess and follow up as appropriate. Unless it puts the student at risk, the University will always be transparent with them about who has raised the concern.
71. Parents or guardians who bring children or adults at risk in their care onto any University campus (except where the child or adult at risk is attending

a University-led event) are always responsible for their safety and welfare and are obliged to ensure that the children or adults at risk in their care do not disturb others or damage University property.

## **Activities and events involving children and adults at risk**

72. It is vital that all required DBS checks are completed for staff and students working with children and adults at risk on or off campus in accordance with safer recruitment processes and DBS requirements based on regulated activity threshold, and that risk assessments are carried out and managed effectively.

## **Activities on campus (e.g. school/college visits to Kingston University)**

73. The safeguarding of children or adults at risk attending a University-led event, is the responsibility of the organiser of the activities in which they are participating. The event organiser should ensure comprehensive risk assessments have been completed to protect the health, safety and wellbeing of children and adults at risk participating in activities taking place on the University campus.
74. When the University organises and hosts visits by schools, colleges and other external organisations, it is expected that the visiting organisation will have completed its own risk assessment and taken steps to ensure child protection in accordance with their local authority guidelines. However, the University's event organisers must satisfy themselves that appropriate safeguarding measures are in place. It is not a defence in law to avoid liability for prosecution by placing reliance on others to discharge the University's duties on its behalf.
75. Where the University is not formally the organiser of on-campus activities involving children and adults at risk (e.g. where KU rooms and facilities have been hired or provided for free), it accepts no liability relating to safeguarding matters. Fully completed risk assessment documentation, valid property damage and public liability insurances (including abuse cover), providing appropriate cover for all associated risks and assurances, may be required before any booking is confirmed.

## **Activities off campus (for example Kingston University visits to schools/colleges, field trips, apprenticeships, placements, volunteering opportunities)**

76. The hosting organisation is usually responsible for risk assessments and safeguarding arrangements for activities that take place off campus. However, the University has safeguarding obligations for any activity it

organises, including those that take place away from its premises. University staff responsible for organising and/or attending off-site activities must ensure suitable safeguarding policies and procedures are in place, and adhered to, and identify a designated safeguarding lead to report any concerns that arise during the off-campus activity or event.

77. The provider of facilities or premises used must have appropriate valid property and public liability insurances in place and may be required to provide copies of all relevant insurance details to the University, e.g. 'To whom it may concern' letters or copy certificates from their broker or insurer detailing the insurances they have in place.

## Use of IT Facilities

78. The University's IT Security Policy prohibits the use, access, storage, or distribution of material that is offensive, obscene, indecent, discriminatory or harassing. However, IT facilities are an open access environment and use of IT facilities by students is not routinely monitored in detail.
79. It is understood that students might occasionally need to view content that may be considered offensive for research purposes as part of their course. Advice for students on [IT security](#) and staying safe online is provided on My Kingston.

This policy was last reviewed by the Student Life Committee in **June 2026** and will be updated annually.

## Appendix A: useful links and resources

- *Definitions of abuse and how to spot the signs:* [Definitions - Report + Support - Kingston University](#) and [Types of abuse - Report + Support - Kingston University](#)
- *Report & Support:* [Report + Support - Kingston University](#)
- *Safeguarding at Kingston University:* [Safeguarding | Kingston University London](#)
- *Single Source of Information for Harassment and Sexual Misconduct: Preventing and addressing bullying and harassment - Equality, diversity and inclusion - Kingston University London*
- *Student Counselling and Wellbeing Team (internal link):* [Wellbeing Support - KU SSP](#)
- *Students of Concern – guidance for staff (internal link):* [Students of concern - guidance for staff](#)
- *Related policies and Regulations:* [Policies and regulations | Kingston University London](#)

See the following:

- *Admissions Policy*
- *Freedom of Speech and External Speakers Policy*
- *Health & Safety Policy*
- *Information Regulations*
- *Missing Students Procedure*
- *Police Protocol*
- *Prevent*
- *Sexual Misconduct Policy and Procedures*
- *Student Complaints Procedure*
- *Student Conduct and Behaviour Procedure*
- *Whistleblowing Policy*

**In an emergency or if someone is in immediate danger, please call 999**