

Kingston University London

SAFEGUARDING POLICY

SERVICES FOR STUDENTS

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1.0 Introduction

- 1.1 Kingston University is committed to the safety and wellbeing of all students, staff, and visitors and aware of its legal duties to safeguard children, young people, and adults at risk. The University will ensure provision of a safe environment beneficial to work, study and the enjoyment of a positive experience for all members of its community.
- 1.2 The University is not able to take on the usual rights, responsibilities and authority of a parent or guardian and will never act in loco parentis. However, all reasonable steps will be taken to ensure the safety and welfare of all people during their studies and work.
- 1.3 The University will maintain the highest possible standards in meeting its responsibilities to protect and safeguard the welfare of children and adults at risk. The University is committed to working in partnership with other organisations (as appropriate) to facilitate this.
- 1.4 The University recognises that 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). This may include under 18s enrolled on some university courses. The admissions and safeguarding arrangements for under 18s enrolled on university courses are outlined in section 6 of the Admissions Policy Staff and students supervising or undertaking outreach work and professional placements in clinical settings, health care, teaching and social care will come into regular contact with children and adults at risk.
- 1.5 In implementing this policy, the University will be mindful of its duty of care and other legal obligations such as under the Health and Safety at Work Act 1974, The Care Act 2014, the General Data Protection Regulation is 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.
- 1.6 All University staff are in a position of trust, in particular those staff who teach, support, guide or in any way interact with students. It is incumbent on all staff to be aware of their responsibilities and act accordingly. This will be enabled through the provision of regular training for all staff. This includes mandatory training for all staff to complete and additional training for the safeguarding team.
- 1.7 The Safeguarding Manager will communicate with the Local Authority Designated Officer (LADO) where there are concerns and communicate with the DBS Regional Safeguarding Outreach Officer where information concerns are needed to be shared with DBS.

2.0 Purpose

- 2.1 The purpose of this policy is to demonstrate the commitment of Kingston University to safeguarding adults and children and to ensure that everyone involved is aware of:
 - The legislation, policy and procedures for safeguarding adults and children.
 - Their role and responsibility for safeguarding adults and children.
 - What to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult or child within the organisation.
- 2.2 This policy applies to all Kingston University staff, applicants, students, volunteers, University representatives, governors, and visitors to the University. It applies to all activities involving contact with children or adults at risk, including where those activities are delivered virtually via an online environment.

- 2.3 For the purposes of this policy “University staff” refers to any permanent, fixed term, associate, temporary or other members of staff employed by the University, including student ambassadors. This also includes contractors, for example skills tutors and specialist mentors.

We expect our partner organisations, including for example, sub-contracted colleges and apprenticeship providers to have their own safeguarding policy in place that they adhere to. The Student Safeguarding Manager will liaise with partner organisations safeguarding lead (or similar role) where needed.

- 2.4 The University recognises that the success of the 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 for key staff and others, as outlined in 1.6.
- 2.5 The Safeguarding Policy will reference statutory guidance and link to other relevant policies in place at the University.

3.0 Applicability

- 3.1 The policy applies to activities that take place: a) on university premises; b) during off-site placements; and c) other off-site activities for which the University is responsible. The University reserves the right to request safeguarding policies and assurances from contractors used on and off its premises.
- 3.2 The University will offer support to students who experience harassment, victimisation, hate crime, sexual misconduct, or violence, on and outside of the University campus.
- 3.3 This policy 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 from the University.

Not covered by this policy:

- Safeguarding issues that arise as a result of private agreements made outside the University by students, e.g., with private halls of residence, private landlords or private counselling. In such cases, the University will facilitate a referral or a discussion and if a referral is made, it needs to be reported to the council where the alleged abuse took place. The student is expected to follow the procedures of the appropriate private organisation or the professional body. However, the University may consider using this policy when both parties (the referrer and referred) are Kingston University students or involve Kingston University staff.

Wellbeing support will always be offered to students and staff.

4.0 Definitions

- 4.1 “Child” – a person or persons 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(ren) is at risk of harm, for example, domestic abuse.
- 4.2 “Adult at risk” – The University bases its definition of “Adult at Risk” on that used within The Care Act 2014: ‘Abuse is described as a violation of an individual's human and civil rights by any other person or persons which results in significant harm. Abuse may consist of a single act or repeated acts. Abuse can occur in any relationship. Abuse can be accidental or deliberate. It can take many forms (as detailed below in Appendix E). There does not need to

be an injury for abuse to have taken place. It is not always obvious, and the person may not identify that they are experiencing or at risk of abuse.'

4.3 “Safeguarding Children” – In defining our approach towards children, the University draws on the definition used by the DfE Keeping Children Safe in Education 2023 (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.

4.4 “Safeguarding Adults at Risk” – While the University is not subject to the provisions of the Care Act 2014, the University draws broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

- 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.

5.0 Key Staff Responsibilities

5.1 Student Safeguarding Manager:

Responsibilities - The Student Safeguarding Manager has day-to-day responsibility for safeguarding at Kingston University and will liaise with the relevant members of the safeguarding network to ensure safeguarding concerns are managed appropriately. The Student Safeguarding Manager’s line manager – Student Counselling and Wellbeing Manager will oversee their work. The overall strategic responsibility will lie with Senior Management within the Student Directorate (Associate Director of Student Life, Health and Wellbeing/Student Services Director).

5.2 Local Safeguarding Officers (LoSO) & Deputy Local Safeguarding Officers (Deputy LoSO):
Responsibilities – The LoSO and Deputy LoSO will act as the first point of contact for any safeguarding matters, providing timely, relevant support and advice in order to safeguard the individual concerned. They will form part of a wider Safeguarding network along with the LSO’s. Enhanced DBS checks will need to be undertaken for all LoSO and Deputy LoSO and appropriate training will be completed.

5.3 Executive Safeguarding Lead: **Louisa Green** – executive university officer with overall responsibility for student safeguarding.

6.0 Freedom of Speech within the Law

The University is committed to ensuring freedom of speech within the law for its employees, students and visiting speakers. Nothing in this policy is intended to limit staff or students’ freedom of expression within the law.

7.0 Preventative Steps

7.1 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.

- 7.2 Student Recruitment/Placements: Departments are responsible for managing their own safeguarding procedures, which must be consistent with this policy. Students accepted onto undergraduate and postgraduate programmes that involve placements or apprentices involving children and/or young people, are required to obtain a satisfactory enhanced disclosure from the DBS. Any under 18s employed by the University, Kingston University students, including apprentices, and children and young people on work experience or visiting the University must have a risk assessment which details any risks associated with the activities and controls which have been put in place to mitigate these risks.
It is the responsibility of Heads of Schools/Departments to ensure that a risk assessment is completed before offering work experience, apprenticeships or inviting young people on to campus.
- 7.3 Engagement of Contractors: The engagement of contractors and others to 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 University's procurement procedures and policies.
- 7.4 Guidance & Support: This takes a variety of forms:
- Advice to students is available through the University website and through the services offered within Students Directorate, most significantly: the Student Safeguarding Manager, the Counselling Team, the Mental Health and Disability team, the Student Advice Team and Information Centre staff.
 - The safeguarding team will be responsible for ensuring that students are able to access and are aware of how to report concerns via several communications throughout the academic year.
 - The University and Union of Kingston Students organises campaigns on appropriate behaviours and reinforcing information about reporting procedures. On some occasions this may be collaborative working.
 - The University is committed to working with other external organisations with a view to fostering a 'healthy' campus. Throughout the year, the Students' Union and teams within the Students Directorate may invite relevant external groups/speakers to the University to share expertise and good practice.
- 7.5 Staff Support: Support for staff dealing with, or affected by safeguarding issues, is generally offered through their Line Manager, Human Resources, and the Employee Assistance Programme. In addition, regular training is provided to the Student Safeguarding Manager and the nominated LoSO/Deputy LoSO.
- 7.6 Proactive Policies and Procedures: The University has in place a range of policies and procedures which are relevant to the implementation of the Safeguarding Policy. These include Whistle Blowing 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; and close working relationships with the police and local Prevent co-ordinators. Our Student Life policies and procedures also support the implementation of the Safeguarding Policy. These include: [Suicide Prevention Strategy](#), [Sexual Misconduct Policy and Procedure](#), [Missing Students Procedure](#), [Mental Health and Wellbeing Framework](#).
- 7.7 Training and Promotion – The University will ensure that all staff are aware of their responsibilities, through basic mandatory training and, where appropriate, will provide training in Safeguarding and Prevent awareness for staff and volunteers, in line with current policy, procedures and professional guidance. The University will also work with the Students' Union, the police, and other relevant groups to promote a safe campus.

7.8 Best Practice – The University will endeavour to raise standards and ensure continuous improvement by participating in national 'kite mark' awards, such as those awarded by Stonewall in relation to LGBTQ+ issues.

8.0 General good practice for staff

8.1 Everyone who works at Kingston University shares a responsibility for making the University a safe and secure environment for everyone.

8.2 Child protection and Adult Safeguarding overrides confidentiality, internal hierarchies, and objectives. Staff should not collude with a parent, a child, or another member of staff to keep concerns secret in areas of child protection or adult and risk. If an adult at risk lacks capacity, the Student Safeguarding Manager will need to decide in the adult at risk's best interest, including considering wider public interest, whether to make a referral.

8.3 One-to-one meetings with an under 18 student should be restricted with suitable arrangements put in place. Staff members may have substantial one-to-one contact only if an enhanced DBS check is in place.

8.4 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.

8.5 Unnecessary physical contact with students should generally be avoided. Whilst such gestures may be well intentioned, these acts may be misinterpreted.

8.6 Staff administering first aid should ensure wherever possible that another member of staff is present if they are in any doubt whether unnecessary physical contact could be misconstrued.

8.7 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.

8.8 The personal telephone number, personal email or home office of any staff member should not be given to any students or children. Where a staff member must use their own mobile to contact a student, they should withhold their number using 141 before dialling.

8.9 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.

9.0 Reporting a safeguarding concern via [Report & Support](#) (this includes harassment/bullying)

9.1 The course of action taken will depend on the specifics of the situation. In all cases it is vital that accurate records are maintained of allegations, concerns, decisions, actions taken and the reasons for these. The University will respond in an appropriate, proportionate, impartial, and timely way to suspicions or allegations of any child or adult at risk.

9.2 If staff in the course of their work at the University have a child protection or adult at risk issue brought to their notice, observe an instance of abuse themselves or have cause for concern regarding a child or adult at risk, they must treat this as a priority and adhere to the Safeguarding procedures immediately. All members of the University have a duty to raise their concerns, without prejudice to their own position, about behaviour by staff, managers, volunteers, students, or others. Staff should recognise that it is their duty to inform but not to investigate.

9.3 The procedure must be followed if allegations or suspicions of abuse are made against a staff member, student, volunteer of the University towards a child or adult at risk either on the University premises or off site, and in a professional or private capacity.

- 9.4 There may be circumstances when an urgent response is required from a member of staff when serious concerns over the behaviour or mental health of a student have been raised or witnessed. The following are all examples of when an urgent response is required:
- **Suicidal behaviour:** Defined as behaviour which can be said to place a person's own life in danger, or any statements made which suggests a person intends to harm themselves.
 - **Harming or threat to harm others:** If a student is very unwell, it may be a component of their mental health condition that they feel threatened by others or experience a level of aggression which is not typical to their personality.
 - **Behaviour that directly/indirectly puts self or others at risk of harm:** An individual may behave in a way which directly/indirectly puts themselves or others at risk of harm. For example, if indirectly, their behaviour may seem risky or unpredictable so that it is difficult to anticipate whether an individual will be able to calculate the risk of their behaviour to themselves or others.
 - **Any immediate concern of child protection and safeguarding**
- 9.5 If an **emergency/urgent/out of hours response** is required you should contact **emergency services on 999** and/or **KUSCO Security on ext 6666**. **This needs to take priority over all duties and should also be reported immediately via Report and Support**. A report on Report & Support should be completed, outlining all the information and actions taken. More than one individual may fill out a report for a single incident, with their account and actions (for example if 2 or more members of staff witnessed or assisted, or if an incident was handed over).
- 9.6 The appropriate follow-up support or action will depend on the nature of the incident. In an emergency, where an ambulance has been called or an individual has been advised to go to hospital, it may be appropriate to contact the individual the following day via telephone, or over the next few days by email to ensure they are receiving the appropriate care. It is recommended that the decision on who is best to make this contact is determined by the Student Safeguarding Manager or The Counselling and Wellbeing Manager in their absence.
- 9.7 If you are concerned about a student/staff member/visitor but an urgent response is not required, you must still fill out a report on Report & Support. You will need to report this within 24 hours. You may discuss with your line manager or LoSO/Deputy LoSO at first instance for support, however you will always have to fill out a report on Report & Support. If your concern is relating to your line manager or LoSO/Deputy LoSOs, direct your concern straight to the Student Safeguarding Manager. If your concern is relating to the Student Safeguarding Manager it is advised you speak to their manager, Counselling and Wellbeing Manager.
- 9.8 If a child or adult at risk has an open case with external services, such a local authority, the safeguarding lead should make sure that, where appropriate, regular updates are given when they arise. The Student Safeguarding Manager will liaise with the KU Cares team in relation to care leavers.
- 9.9 If a child is at immediate harm, this needs to be communicated straight away to social care by phone, who will advise on further steps. Further information is included in appendix D.
- 9.10 Further steps following an incident being reported, might be to refer to internal and/or external agencies. The aim is that referrals are sent within 5 days of a concern being raised, if appropriate and necessary. Further information can be found in appendix D.
- 9.11 If the concerns or accusation relates to a staff member, the HR LoSO and/or deputy LoSO will be involved in the follow up. Further steps may need to be taken in line with the [Disciplinary Procedure](#), [Personal Relationships Policy](#) and other such policies.
- 9.11 Further information in appendix C can be found on self-care, consideration, and decision-making.

10.0 Confidentiality

- 10.1 Confidentiality is necessarily limited by the law and by some 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. Staff receiving a report should not give any assurance of confidentiality. Further information in Appendix C.

11.0 Concerns that relate to criminal matters

- 11.1 The University reserves the right to report to the Police any incident which it believes may constitute a criminal offence and consideration around risk will be identified. It should be noted that the University does not undertake criminal investigations and individuals who believe that they are a victim of crime should report this to the police or other relevant authority.

12.0 Malicious allegations

- 12.1 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 the 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.

13.0 Person against who an allegation has been made

- 13.1 For cases of alleged serious or gross misconduct, the line manager should proceed directly to a formal investigation. Further details of this can be found within the Human Resources Disciplinary Procedures document. Suspension may be considered for cases of alleged serious or gross misconduct and the manager will discuss this with HR and refer to the Disciplinary Procedure. The Student Safeguarding Manager will work closely with the line manager and HR as part of this investigation.

14.0 Involvement of parents and legal guardians

- 14.1 In normal circumstances the University deals directly with students and not with their parents, guardians or other third parties. This approach applies to students who are adults at risk or who are under 18 years.
- The University has duties under data protection legislation to preserve the right to privacy and confidentiality of students. The University therefore only discloses information regarding students (including adults at risk or children) to third parties (including parents, guardians, emergency contacts and next of kin) in accordance with its data protection policy. Please refer to 8.9 for KU Cares guidance in relation to care leavers.
- If a parent/guardian calls the University with concerns about a student, this would be followed up in the appropriate way and, unless it puts the student at risk, we would always be transparent with the student as to who raised the concern when we contact them.
- Parents or guardians who bring children or adults at risk in their care onto the campus (except to attend 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.

15.0 Activities on campus

- 15.1 The Safeguarding of children or adults at risk visiting the university is the responsibility of the organiser of the activities in which the children or adults at risk are participating. Where the University is not formally the organiser of the activities (whether this is hiring KU rooms or facilities or if it is used for free), it accepts no liability relating to safeguarding matters.

It is the responsibility of the organiser of the activities to ensure that appropriate staff and volunteers are DBS checked as part of appropriate and comprehensive risk assessments in relation to the health, safety and wellbeing of children and adults at risk participating in activities on the University campus. It is expected that for organised visits by schools, colleges and other external organisations that visiting staff will have completed their own risk assessment and taken steps to ensure child protection in accordance with their own Local Authority guidelines. However, the University's event organisers must still satisfy themselves that appropriate measures are in place, as it is no defence in law to avoid liability for prosecution by placing reliance on others to discharge the University's duties on its behalf. Where the University is not the organiser of the activities, fully completed risk assessment documentation, valid property damage and public liability insurances (including abuse cover), providing appropriate cover for all associated risks and assurances regarding completion of DBS checking procedures may be required before any booking is confirmed.

16.0 Activities off campus (for example school visits, field trips, placements, volunteering opportunities, union activities)

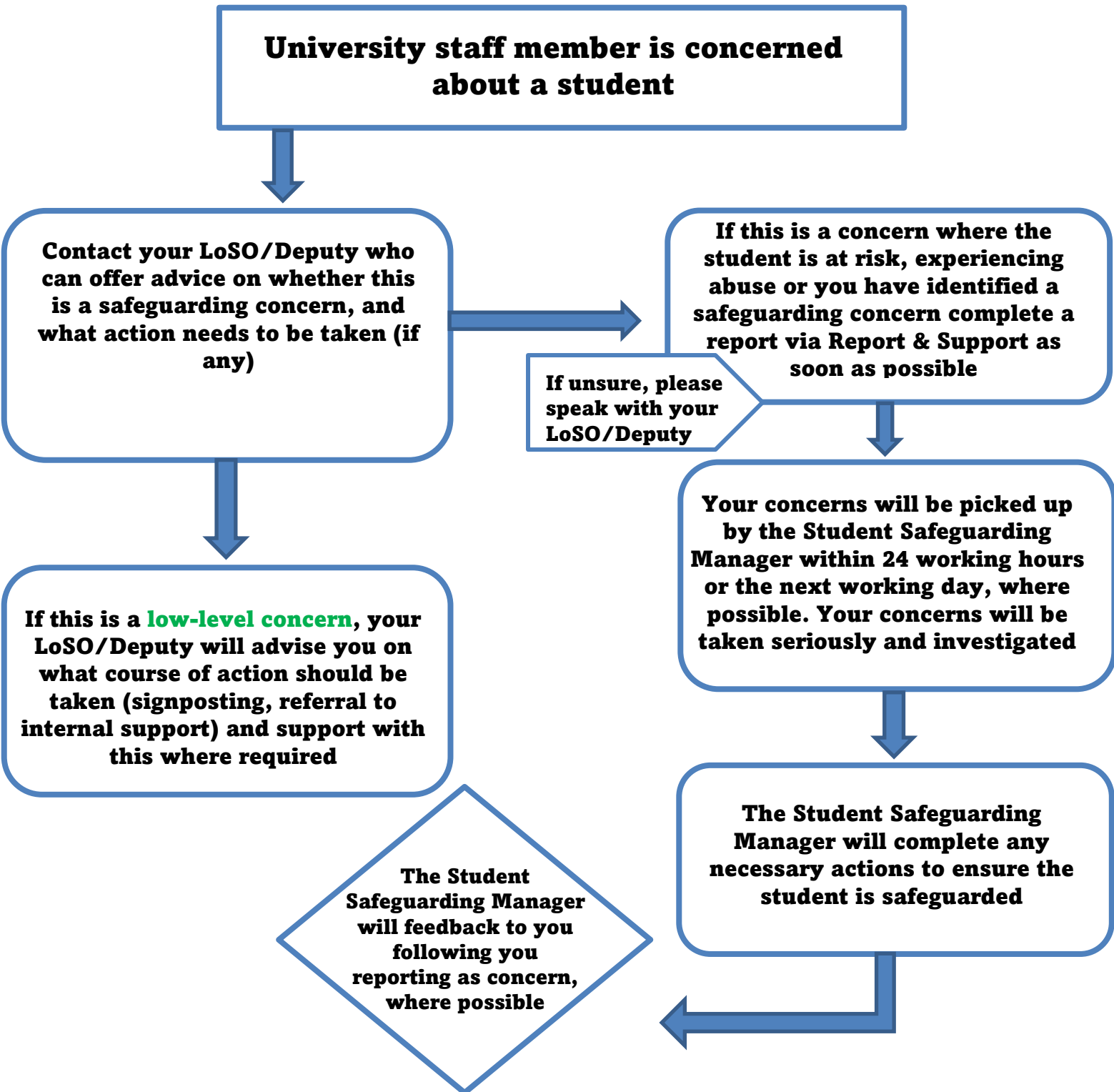
- 16.1 It is vital that appropriate DBS checks are in place for staff/students working off-campus with children and young people. It is important to identify if such places have risk assessments in place and to identify a designated safeguarding lead to report any concerns that arise during the off-campus activity or event.
- 16.2 It's important to be aware that the responsibility is held at the off- campus site and their policies and procedures are adhered to. However, where it is a University organised activity, we have obligations relating to safeguarding as stated above in 15.0. However, we will always refer to the external organisation's policies and procedures as required.
- 16.3 There are requirements that the provider (e.g. of facilities or premises we may use) has appropriate valid property and public liability insurances in place and that they provide copies of all relevant insurance details to the University. Normally they would provide 'To whom it may concern' letters or copy certificates from their broker or insurer detailing the insurances they have in place.

17.0 Use of IT Facilities

- 17.1 The University's [IT Security Policy](#) prohibits the use, access, storage, or distribution of material that is offensive, obscene, indecent, discriminatory or harassing. The IT facilities are, however, an open access environment and use of IT facilities by students is not routinely monitored in detail. There may be times students might need to research content that may be considered as offensive for research purposes as part of their course. Advice on data and computer security and keeping safe online is provided for staff and students.

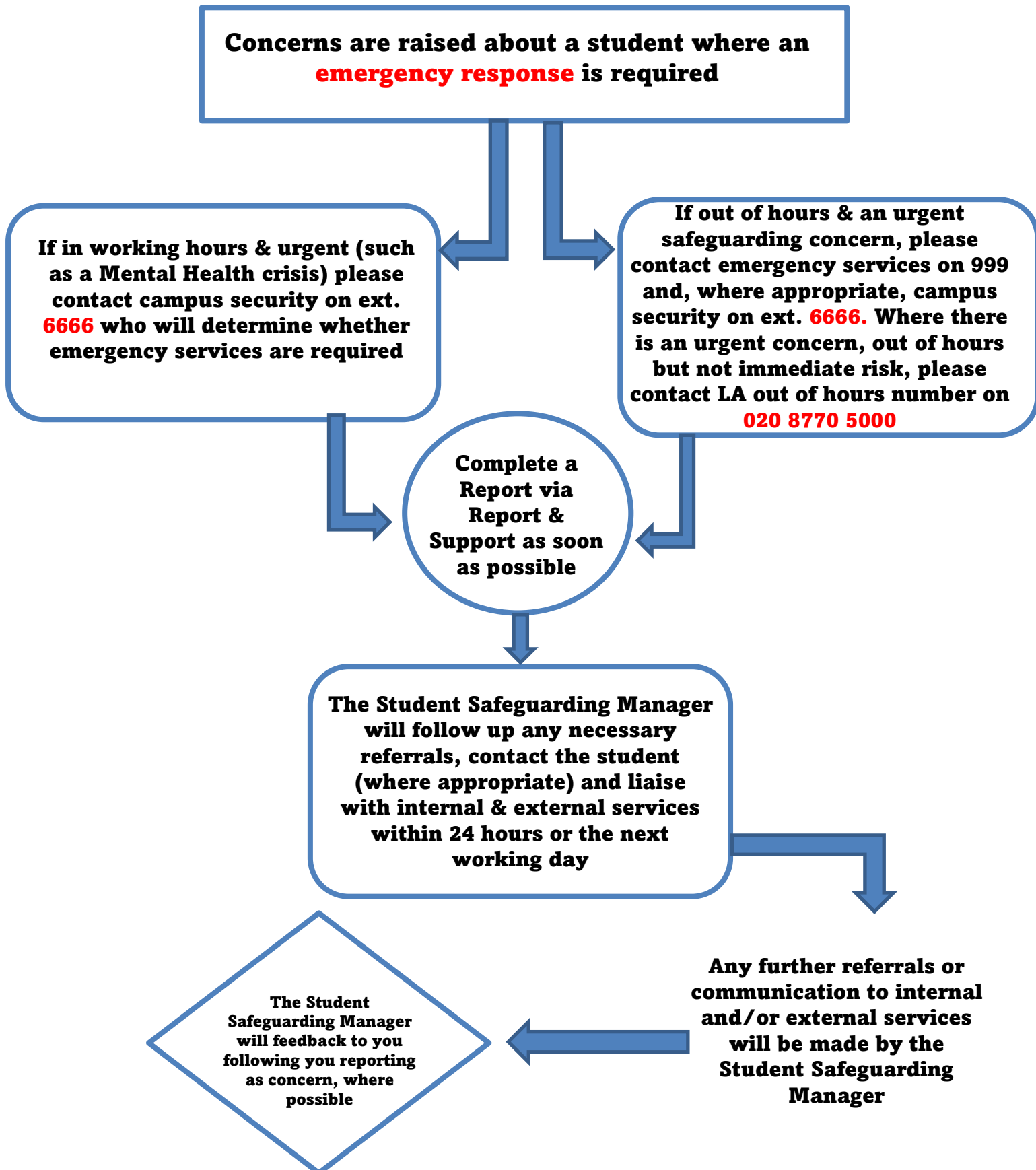
Appendix A

Flowchart when there is a concern for a child or an over 18 adult at risk



Appendix B

Flowchart for cases when an emergency response is needed.



Appendix C

Impartiality and self-care

It is recognised that dealing with safeguarding situations and listening to personal accounts can be frightening, distressing, and potentially triggering for the listener. It is also important to note that these heightened reactions have the capacity to impair judgement. Consequently, staff who are vulnerable to the issues under investigation, should not be involved in the investigation and reporting process.

For many staff, even those not emotionally affected by these incidents, a debriefing session may be advisable which is likely to be the line manager. Staff are advised that this is good practice and should not be viewed as a source of shame or an indication of weakness or failure.

Should a debriefing take place, it is important to do so without reference to identifying details of staff or students involved. In some circumstances, staff may also wish to speak in confidence with a counsellor through the Employee Assistance Programme.

Confidentiality

Safeguarding issues present major challenges to confidentiality. If individuals reporting concerns fear that information will be passed on to others, they may be less likely to disclose. The same issue may exist for someone who is seeking help with their own violent, abusive, or potentially extremist or terrorist behaviour or thinking.

Staff cannot ever give an assurance of complete confidentiality, i.e., we cannot keep promises that we will keep everything the individual says as a secret. Confidentiality is necessarily limited by the law and by some university policies.

Where appropriate, staff should normally inform the person making the disclosure that the information will be passed on to the Student Safeguarding manager, who may then have to pass this to the police or Social Services.

The need to break confidentiality is rare but it most certainly applies in relation to some safeguarding issues. These may include but are not limited to:

- where the welfare of a child or adult is at risk
- where a student is at risk of being drawn into terrorism or ideologies that support terrorism
- discussions where an intention to harm oneself or someone else are expressed
- discussions where involvement in; or intention to become involved in; terrorism, or support for terrorism or extremist ideologies is expressed.

When it is considered necessary to break confidentiality, staff are advised to first discuss the issues with a senior colleague (if possible) and to do so on what is called a 'need to know' basis only. Where possible and safe, the need to break confidentiality should be discussed with the person making a disclosure.

There may be exceptional circumstances where it is not possible to inform the person making the disclosure that the information will be passed on: e.g., if this would be likely to impede the investigation of a crime or the arrest of an offender or put the safety of others at risk – this should be discussed immediately with the Student Safeguarding Manager, if possible. There may be times where the Student Safeguarding Manager will need to consider the capacity of the adult at risk and whether they can make their own decisions.

Consideration and decision making

When considering safeguarding concerns (relating to a child, adults at risk, an individual at risk of radicalisation, violence against women, harassment or hate crime) the Student Safeguarding Manager should consider the evidence that is giving rise to the concern and assess how objective it is, e.g., is it a gut instinct, is it based on observation or on an explicit report.

Having considered the concern and any relevant evidence, the Student Safeguarding Manager (in discussion with the overarching safeguarding team) shall determine what further steps to take, which may include:

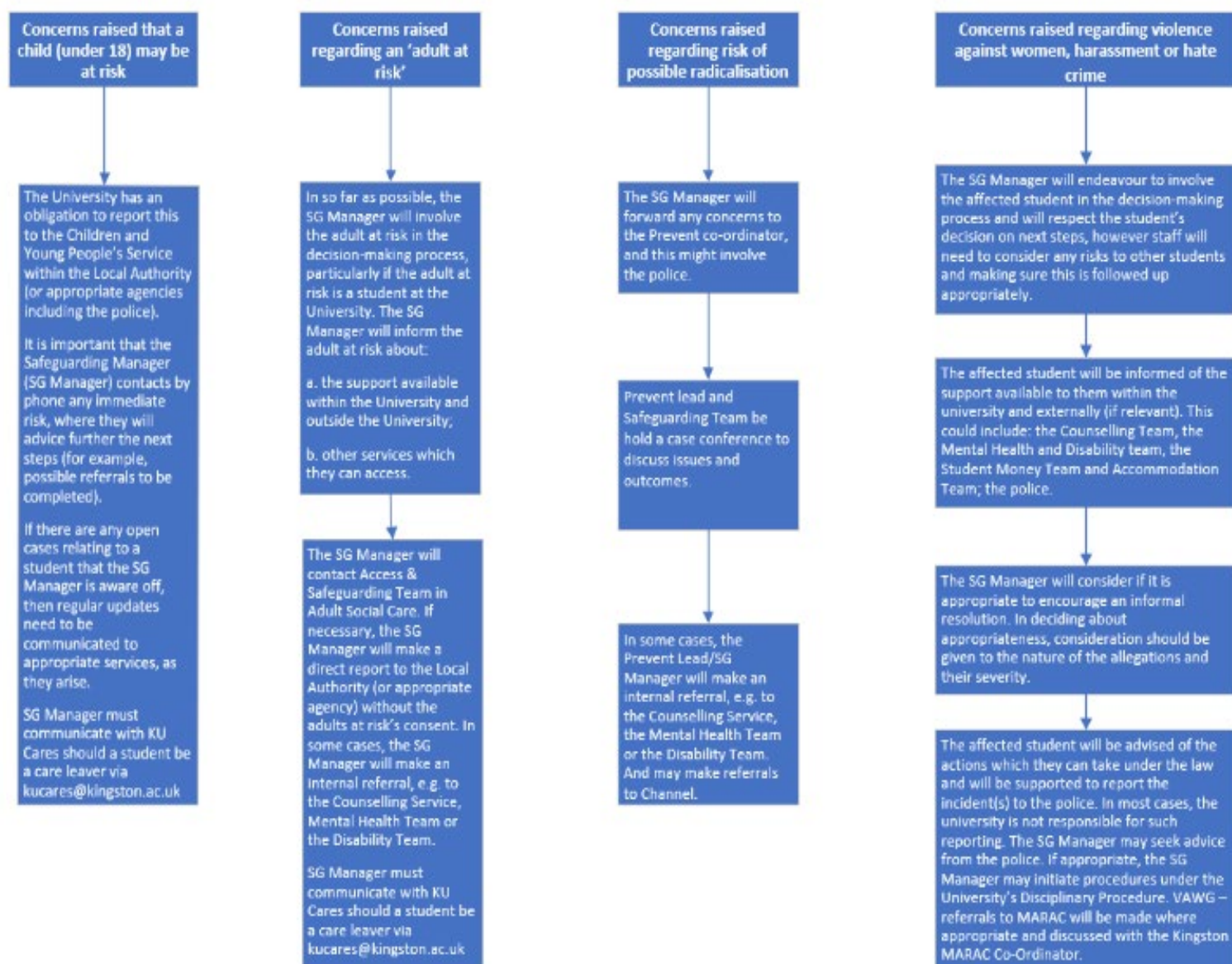
- Referring the person concerned to relevant support services, such as to the Money Advisors, Counselling Service, or the Disabilities Service.
- Referring the matter to be considered under another University policy or procedure; and/or
- Reporting the matter to an external body, such as the police or the local authority.

Further guidance on actions to be taken in relation to specific concerns is set out below.

If appropriate, the Student Safeguarding Manager will report back to the person raising the concern updating them on progress and on the outcome. However, this may not be possible if to do so would conflict with other University procedures, policies or GDPR requirements. If appropriate, the person raising the concerns should be advised about appropriate support procedures which are in place either internal or external to the University.

Appendix D

Actions in relation to specific concerns



Appendix E

Examples of safeguarding concerns and definitions

Causes for concern that would fall under this policy – see definitions below.

This list is not exhaustive, and many issues are interlinked and overlapping.

- Abuse (in many forms and including historical abuse)
- Bullying and harassment, including hate crimes
- Radicalisation
- Violence against women.

Further Guidance on the types of causes for concern

Abuse

Abuse can take many forms and can be loosely defined as cruel and/or violent treatment. It may be a single act or repeated behaviour and it may also be intentional or unintentional. Abuse may also be peer on peer, carried out by children, young people, and adults at risk. Abuse may also be defined as an act of neglect or a failure to act on the part of someone who has caring responsibilities.

The following examples would be abuse. Please notes, this list is not exhaustive:

Safeguarding concern	Characteristics
Physical abuse and violence.	May involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm, including by fabricating the symptoms of, or deliberately causing, ill health to another.
Verbal abuse and insults	Verbal abuse most commonly includes abusive behaviour such as name calling, put downs and discounting feelings. As well as using words, verbal abuse can include using silence to exert abuse.
Sexual violence and abuse	Acts of physical, psychological, and emotional violation in the form of a sexual act, inflicted on someone without their consent. It can involve forcing or manipulating someone to witness or participate in any sexual acts. Sexual violence and abuse are any behaviour of a sexual nature which is unwanted and takes place without consent or understanding. Not all cases of sexual assault involve violence, cause physical injury, or leave visible marks. Sexual assault can cause severe distress, emotional harm and injuries which can't be seen – all of which can take a long time to recover from. It can include forcing or enticing a child, young or vulnerable person to take part in sexual activities, whether, or not the individual is aware of what is happening. The activities may involve physical contact, including rape or sexual assault or non-penetrative acts. It would also include individuals in looking at, or in the production of, pornographic material, or encouraging children, young or vulnerable individuals to behave in sexually inappropriate ways.
Emotional and psychological abuse	Emotional or psychological abuse can be verbal or nonverbal. It is ill treatment such as to cause severe and persistent adverse effects on an

	individual's emotional wellbeing and includes verbal abuse such as yelling, name-calling, blaming and shaming or isolation, intimidation, threats of violence and controlling behaviour. It may involve conveying to individuals that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It would also include age or developmentally inappropriate expectations being imposed on children and adults at risk, causing children frequently to feel frightened, or the exploitation or corruption of children or adults at risk.
Neglect	The persistent failure to meet a child, or adults at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a child or adults at risk's basic emotional needs
Financial exploitation or control of children, adults at risk or as a form of domestic violence.	In relation to children or adults at risk, may include having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused. It may also be defined in intimate relationships as a way of controlling a person's ability to acquire, use and maintain their own money and financial resources, particularly in terms of domestic violence.
Exposing children / adults at risk to inappropriate situations.	Such as drug taking or heavy drinking, and/or inappropriate materials such as pornography, violent films, and cruelty
Domestic violence including coercion, financial and emotional abuse.	<p>Domestic abuse, or domestic violence, can be defined as any incident of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality. The abuse can encompass, but is not limited to:</p> <ul style="list-style-type: none"> ● psychological ● physical ● sexual ● financial ● emotional <p>The definition includes so-called 'honour' based violence, female genital mutilation (FGM) and forced marriage. Victims are not confined to one gender or ethnic group. Family members include mother, father, son, daughter, brother, sister, and grandparents, whether directly related, in laws or stepfamily.</p> <p>Definitions: Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of</p>

	<p>support, exploring their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.</p> <p>Coercive behaviour is an act or pattern of acts of assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.</p> <p>Forced marriage is a marriage conducted without the valid consent of one or both parties and where duress is a factor. An arranged marriage becomes a safeguarding issue where the person concerned is a child or is an adult who lacks the capacity to provide valid consent.</p>
Female Genital Mutilation	<p>Female Genital Mutilation (FGM) - A collective term for a range of procedures which involve partial or total removal of the external female genitalia for non-medical reasons. It is sometimes referred to as female circumcision, or female genital cutting.</p> <p><u>There is a duty to notify police as a professional if you suspect or have been told of FGM. This is the only abuse that holds a prison sentence if you withhold such information.</u></p>
Honour based violence including forced marriage (see Domestic violence)	<p>'Honour-based' violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and / or community.</p>
Modern slavery and human trafficking	<p>Modern slavery is the recruitment, movement, harbouring or receiving of children or adults using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for several reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.</p>
Upskirting	<p>Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales. The new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress, or alarm.</p> <p>Anyone, and any gender, can be a victim and this behaviour is completely unacceptable.</p>
Stalking	<p>Stalking can be defined as persistent and unwanted attention that makes someone feel pestered and harassed. It includes behaviour that happens two or more times, directed at or towards a person by another person, which causes someone to feel alarmed or distressed or to fear that violence might be used against that person. It can go on for long periods of</p>

	time. The problem is not always 'physical' — stalking can be psychologically as well. Social media and the internet are often used for stalking and harassment, and 'cyber-stalking' or online threats can be just as intimidating.
Sexual Exploitation	A type of sexual abuse in which children and adults at risk are sexually abused for money, power, or status. Some children or adults at risk maybe trafficked into or within the UK for the purposes of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Potential signs of abuse

Signs may not always be indicative of abuse, and it is advised that those with concerns approach the issue carefully, being aware that to make false allegations of abuse may in itself cause harm. Staff receiving such reports will not decide if there is sufficient evidence or if the allegation is 'true' this is the responsibility of either Social Services or the police. Staff must always report such disclosures to the Student Safeguarding Manager via the online reporting tool.

Other signs are generally either physical, behavioural or both:

- Neglected or under nourished appearance
- A deterioration in appearance and / or mood
- Unexplained bruising
- Unexplained or inappropriate covering up
- A deterioration in social engagement, accompanied by an increase in fearfulness
- Children using sexually explicit language or gestures
- Children using violent gestures or being violent to others

Further details and other examples can be viewed on the Social Care Institute for Excellence (SCIE) website - [Types of abuse: Safeguarding adults | SCIE](#).

Bullying and Harassment

The terms 'bullying' and 'harassment' are often used interchangeably, and bullying may be seen as a form of harassment.

Bullying / harassment and discrimination can take place in relation to any individual, who may not necessarily be a child or adult at risk. For the purposes of this policy and its implementation, the University defines bullying and harassment as behaviour that:

- is not acceptable to the recipient and
- can 'reasonably' be considered to be harassment.

While the motivation of the person doing the harassment may be considered, it is not a deciding factor. The key question is could the behaviour in question 'reasonably' be considered to be harassing, hostile, intimidating, degrading or humiliating, to the other.

Bullying, harassment, and discrimination can take place through 'actively' harmful behaviour (such as name calling) or through passive behaviour (such as intentionally excluding someone). The behaviour is "unwarranted and unwelcome" (Bullying or harassment may be by an individual against an individual (perhaps by someone in a position of authority such as a manager or supervisor) or involve groups of people. It may be obvious, or it may be insidious. (ACAS).

Typically, for behaviour to be considered harassment, it must be persistent and continue or develop over a period of time. Nevertheless, a one-off incident which is particularly serious can however, in

itself constitute harassment. Harassment relating to any of the protected characteristics (Equality Act, 2010) is unlawful.

The protected characteristics are:

- Age
- Disability (physical or mental)
- Gender reassignment
- Marriage and civil partnership
- Race (including ethnic and national origins, colour, and nationality)
- Religion or belief (including lack of belief)
- Sex (including sexual harassment)
- Sexual orientation
- Pregnancy and maternity

Harassment can be verbal, physical, or emotional. It can be carried out using letters, emails, social media, text messages and graffiti. It may be expressed directly to the 'recipient', occur in their presence, or be communicated about them to a third party.

The following are typical examples (not exhaustive):

- Insults, name-calling and offensive language and gestures
- Offensive or demeaning jokes
- Ridiculing and undermining behaviour
- Inappropriate or unnecessary physical contact
- Physical assault or threats of physical assault
- Intimidating, coercive or threatening actions and behaviour
- Unwanted sexual advances
- Isolation, non-cooperation, or deliberate exclusion
- Comments about a person's appearance, intrusive questions
- Comments about a person's private life and malicious gossip
- Offensive images and literature • Pestering, spying, trolling or stalking.

More information for support can be found on [Preventing and addressing bullying and harassment - Equality, diversity and inclusion](#) webpage.

Staff members should also reference the [Bullying & Harassment](#) and  [Grievance](#) procedure.

[General Regulations](#) for students also includes a section on codes of conduct and expectations for all students (p15), which states:

Students are expected to conduct themselves with due consideration for the rest of the University community. Students are expected to behave considerately at all times as a member of the University and local community and to respect the rights of other students, staff and members of the general public both on and off campus.

Hate Crimes

Hate crimes are crimes motivated by prejudice, hatred or intolerance that intentionally demean or harm individuals and groups, defined by their actual (or perceived): disability, race, religion, sexual orientation, or transgender identity. They create an environment in which people experience or could reasonably fear, harassment, intimidation, or violence. Hate crimes can include:

- threatening behaviour
- assault
- robbery
- damage to property
- inciting others to commit hate crimes
- harassment

Radicalisation

Defined in the Prevent duty guidance as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”. More information can be found: [Prevent duty guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61622/Prevent_duty_guidance_-_GOV.UK.pdf).

Potential signs of Radicalisation - It is widely acknowledged that radicalised individuals come from a wide range of backgrounds and are often described as “demographically unremarkable” (House of Commons, 2010-12). The caution needs to be emphasised when considering a potential concern about radicalisation, as many signs of radicalisation can equally well be brought about by other life circumstances:

- Notable changes in behaviour and mood
- Expressed support for violence and terrorism or increasingly sympathetic views to terrorist acts
- Expression of extreme political or radical views
- Change of appearance
- Dramatic change of friends
- Spending excessive time alone
- Possession of violent extremist literature
- Attempts to access or contribute to violent extremist websites
- Possession of material regarding weapons and/or explosives
- Possession of literature regarding military training, skills and techniques
- Claims of involvement in organisations espousing violent extremist ideology
- Claims of attendance at training camps
- Claims of involvement in combat or violent activity on behalf of violent extremist groups.

Violence Against Women and Girls (VAWG)

The United Nations defines violence against women as: “any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life” (General Assembly Resolution 48/104; Declaration on the Elimination of Violence against Women, 1993).

Support will be given to any student experiencing VAWG and be linked in with external support services that the student would like to be supported by. This could be local ISVAs/IDVAs, specialist counselling, advocacy, support groups etc.

Where appropriate, referrals to MARAC and discussion with Kingston’s MARAC Co-Ordinator.

If a student comes to you as a member of staff, it is important that all allegations are taken seriously, and it is not in your judgement to determine whether the student is telling the truth or not – all reports need to be taken as factual from the student.

Appendix F

Support services for students

In some cases, it might be helpful to inform the student of relevant support services – both internal and external. Below is some information that can be given to a student when they are not in immediate risk and you do not have to act urgently. You will also find useful resources on the MyKingston pages: [Student Wellbeing hub \(sharepoint.com\)](#)

- Student Wellbeing service on 020 8417 2172 to book a one-off wellbeing appointment, drop-ins, stress and time management sessions all available daily. This is also available for students to book online to a particular slot themselves
- Self-help leaflets, available online on our website: [Kingston University - Self Help Guides \(ntw.nhs.uk\)](#)
- The Student's General Practitioner (GP) – Fairhill University Health Centre: 020 8417 2204
- 'NHS 111', for emergency or urgent care services: 111
- Nightline: 020 7631 0101
- Samaritans: 116 123
- The Community Mental Health Team: 0203 513 5000 or email: KingstonAdministrators@swlstg.nhs.uk
- Student Minds: [Student Minds - Home](#)
- Good thinking: [Good Thinking - NHS approved wellbeing service | Good Thinking \(good-thinking.uk\)](#)
- [Rape Crisis South London - Rape & Sexual Abuse Support Centre Rape Crisis South London \(rasasc.org.uk\)](#)
- RASASC National Helpline: 0808 802 9999
- [Refuge Against Domestic Violence - Help for women & children.](#)
- Women's Aid: [Home - Women's Aid](#)
- Kingston Domestic Violence Hub - [Get help from domestic or sexual violence – www.kingston.gov.uk](#)

Appendix G

Information for safeguarding leads dealing with a concern

Kingston Council 7 Minute Briefing: “Safeguarding referrals”:
[ASG Access 7MB.pdf](#)

7 Minute Briefing “Safeguarding Referrals”

What Next?

If you have a concern regarding an adult, and it appears that the following 3 steps are met, complete the safeguarding adults [referral form](#) and email to Safeguarding & Access Team.

- The person has care and support needs
- They may be experiencing or at risk of abuse or neglect
- They are unable to protect themselves from that abuse or neglect because of those care and support needs

The Royal Borough of Kingston Adult Social Care Safeguarding & Access Team on: 020 8547 5005
 Email: adult.safeguarding@kingston.gov.uk
 Out of Hours: 020 8770 5000

If it is a criminal offence please contact the police on 101 or if an emergency on 999

What is Safeguarding?

The Care Act 2014 puts adult safeguarding on a legal footing. It is about people and organizations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adults wellbeing is promoted, including, where appropriate, having regard for their views, wishes, feelings and beliefs in deciding on any action.

Safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the Local Authority is meeting any of those needs)
- Is experiencing, or at risk of, abuse or neglect
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Why it is Important - Your Responsibility

If, on the basis of the information available to you, it appears that the 3 points (in Section 1) are met, a referral **MUST** be made to the Local Authority by completing the referral form and emailing it to adult.safeguarding@kingston.gov.uk

The person who raises the safeguarding concern has a responsibility to first and foremost safeguard the adult at risk before the referral is made to the Local Authority.

- Safety of the adult and others - assess the risk
- Have a conversation with the adult to obtain their views and tell them what action you will be taking
- Contact Emergency services, if required
- Medical treatment sought, if required
- Consent from the adult and Mental Capacity considered
- Best Interest Decision made and recorded, if the adult at risk is deemed to lack capacity to consent to the referral
- Public and vital interest considered and recorded
- Police report made, if required
- Referrals to other agencies, AFC, 'Think Family'
- Action taken to remove/reduce risk, where possible and recorded
- Recorded clear rationales for decision making

Essential Information Required

In order for the referral to be triaged in a timely manner by the Adult Access Team, as per the timescales in the PAN London Guidance (immediate action in cases of emergency, within one working day in other cases), it is essential that all the information is provided within the referral form.

Basic Information:
 Name, Date of Birth, Ethnicity, Address, type of Accommodation, Funding Arrangements, GP details – (name/practice), Primary Health Conditions/Diagnosis, Basic Facts – (does the adult have care and support needs, any communication difficulties, health needs). Contact details for Referrer, any other relevant individual involved (carers, family members, friends, NOK, Advocate, LPA). Telephone numbers - is this number safe to make contact (eg in domestic abuse, can this number be used without increasing the risk), if not what number can be used

Details of Alleged Abuse and Person Alleged to have Caused Harm

Always provide details on the type of abuse with factual details of the concern /alleged abuse - what, when, who, where. Provide details of the person alleged to have caused harm - name, date of birth, address, telephone number, what is their relationship to the Adult at Risk, if these are available.

If Domestic Abuse it is essential to record whether the Adult at Risk is still with the alleged perpetrator, how can safe contact be made?

If the concern is regarding a registered provider or the person alleged to have caused harm is a paid or voluntary member of staff, provide the details of the organisation.

It is essential to know whether the person alleged to have caused harm is the main carer and whether they live with the Adult at Risk.

Is the alleged person to have caused harm aware of the referral, have there been previous allegations made against this person before, are there any concerns about their capacity, do they have care and support needs?

Current Safety Status and Risk Assessment

It is essential to know what actions have you taken, as the Referrer, to make the adult at risk safe. If a report has been made to the Police, provide the Crime Reference Number, how and where this was reported.

Consider whether there are other adults at risk, if so provide details of all other adults. 'Think Family', are there children at risk, and if so provide their details, as well as the date AFC were informed of the concerns.

If you are aware of any previous allegations of abuse or neglect, it is important to provide details.

In relation to assessing the risk, what is your professional opinion of the level of risk. Provide clear rationale for your decision making? Has a risk assessment been completed? Has any other documentation/assessments/investigations been completed that could assist with triaging the safeguarding concern?

Making Safeguarding Personal and Mental Capacity

Making Safeguarding Personal is ensuring that the safeguarding process is person centred and outcome focussed. It is essential that the adult at risk is involved throughout the process, beginning, middle and end and their views obtained.

It is essential that the referrer speaks to the adult at risk about the safeguarding concern before a referral to the Local Authority, to obtain their consent for the referral to be made and to gather their views on what they would like to happen.

If the referrer deems the adult at risk to lack capacity, has a best interest decision been made and recorded? Is there an advocate, family member, friend, LPA, NOK involved with the adult at risk, who has been involved in that best interest decision making? Does an advocate need to be appointed? If the adult has capacity and does not consent to the referral, this should be explored with the adult. If a decision is made that a referral should be made without consent, evidence of the decision making process should be provided with the referral.

Our responsibility

Our responsibility is to first and foremost safeguard the adult at risk

- Have a conversation with the adult to obtain their views and tell them what action you will be taking
- Consent obtained from the adult at risk and mental capacity considered/Best Interest Decision made and recorded, if the adult at risk is deemed to lack capacity to consent to the referral
- Assess immediate risk, ensure the adult is in no immediate danger
- Arrange any medical treatment (offences of a sexual nature will require police involvement)
- If a crime is in progress or life is at risk dial 999
- Preserve any physical evidence if in relation to a crime and preserve evidence through recordings
- encourage and support the adult to report the matter to the police if a crime is suspected and not an emergency
- Ensure others are not in danger
- Inform your manager and follow your safeguarding adult's policies/procedures
- record all the information

Action Taken to be reviewed

The manager or designated safeguarding lead for the organisation should:

- Clarify that the adult at risk is safe, that their views have been sought & recorded & they are aware of what action is being taken
- Check issues of consent/capacity have been addressed
- If the adult at risk's wishes is being overridden, check that this is appropriate and that the adult at risk understands why
- If a child or young person is also at risk, contact AfC
- If the person allegedly causing harm is also an adult at risk, arrange appropriate care & support
- Ensure action is taken to safeguard others
- Take action in line with disciplinary procedures (appropriate to suspend staff?)
- If the incident constitutes a notifiable event, complete & send notification to CQC
- If a criminal offence has occurred report to the police
- Preserve any forensic evidence if necessary
- Record all the information, including all actions and decisions
- Referral to the Local Authority

Concern Checklist

- Ensure safety of the adult and others
- Initial conversation with the adult at risk (if appropriate, if a criminal offence do not 'interview the adult')
- Emergency services contacted and recorded
- Medical treatment sought
- Consent sought, if appropriate
- Mental Capacity considered
- Best Interests Decisions made and recorded (involve family members/LPA)
- Public and vital interest considered and recorded
- Report to police if appropriate
- Evidence preserved
- Referrals made, e.g., to AfC if there are children safeguarding matters
- Action taken to remove/reduce risks - suspension of staff if appropriate
- Recorded clear rationale for decision making
- Referral to Local Authority (complete Safeguarding Referral Form)
- HR LoSO and deputy LoSO is contacted and follow up will involve them if concerns relate to staff concerns

Contact details for adult services:

If you are concerned about yourself or another adult or may be being abused or neglected, contact the Access & Safeguarding Team in Adult Social Care –

Telephone Number: 020 8547 5005

Fax: 020 8547 6142

Email: adult.safeguarding@kingston.gov.uk

Out of Hour: 020 8770 5000

Please complete a safeguarding adults referral form, which can be found on the Kingston Internet or follow this link: [Safeguarding Concern Form – www.kingston.gov.uk](http://www.kingston.gov.uk/Safeguarding_Concern_Form)

In an emergency call the Police on 999.

If you think there has been a crime but it is not an emergency, call the Police on 101.

If you are unsure about whether to make a referral or you would like to talk through a concern, call the above number.

Contact details for children's safeguarding services:

If you are concerned about a child (someone under the age of 18), please contact the children's safeguarding services on –

Telephone number: 020 8547 5008

Email address: spa@Kingston.gov.uk / spa@Richmond.gov.uk

For further information please visit:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk>

If you are unsure about whether to make a referral or you would like to talk through a concern, call the above number.

Do: ● Stay calm and listen ● Take what you are being told seriously ● Offer support to help them stop the abuse happening ● Be aware that medical or other evidence might be needed ● Make a written note of what you have been told ● Contact the Access Team without delay.

Do not: ● Press the person for more details ● Assume that someone else will take action ● Contact the alleged abuser ● Promise to keep it a secret.

Version Control			
Version	Date	Author	Change Description
1.0	22/07/2021	C.Savyell R.Gill	Page 6, 5.1 – Name change
2.0	19/01/2022	C.Savyell	Page 5, 4.3 – Edit
3.0	12/04/2022	C.Savyell	Page 6, 5.1 – Delete names Page 9, 9.6 – Delete sentence
4.0	08/06/2023	C.Savyell	Annual general review
5.0	26/10/2023	C.Savyell	Changes to process/overview changes
6.0	05/12/2023	C.Savyell	Completed annual changes / updates to SG team/referral routes