Safeguarding Policy

Approved by: Executive Board
Date: January 2024
Review by: July 2025

INTRODUCTION & KEY REQUIREMENTS

1. Royal Holloway University of London is committed to ensuring the safety of everyone involved in its activities and strives to provide a safe environment for all students and staff studying, working, and socialising at the University and for visitors to our campus and facilities.
2. Universities are expected to safeguard children, young people, and adults at risk of harm and or exploitation during the course of any activity which relates to the University, irrespective of duration or location. In addition, students, staff, and visitors have the right to study and work in an environment that is free from harm and all forms of prejudice, harassment, bullying and discrimination. This is supported by our Dignity and Respect Policies for Students and staff.
3. Employees of Royal Holloway who work with children or vulnerable adults, either on or off campus, as part of university business, will safeguard the wellbeing of all of these individuals in line with the 5 Rs of safeguarding (Recognise, Respond, Report, Record, and Review).
4. The University will nominate a Designated Safeguarding Lead (DSL) and Prevent Lead. The DSL will nominate a Deputy Designated Safeguarding Lead (DDSL) and each Academic School and Professional Service will nominate a Responsible Person for their area of responsibility.
5. Royal Holloway acknowledges its requirements and is committed to uphold the Prevent statutory duty to have due regard to the risk of people within its community being drawn into radicalisation and terrorism. Preventing students and apprentices from being drawn into terrorism or supporting terrorism is fundamentally considered a safeguarding duty.
6. Area specific documents which detail local processes and procedures will be- managed by the nominated Responsible Persons and are available as appendices to this policy. (see Appendix3).
7. Research proposals must include safeguarding as part of the ethics considerations. Where funders require specific safeguarding plans must be written.
8. Safeguarding must be part of the risk assessment for any fieldwork or fieldtrips organsied and managed by the University or Students' Union.

RELEVANT LEGISLATION

9. The Safeguarding Policy is informed by national legislation and guidance including:

- Children Act (1989)
- Data Protection Act (2018) & GDPR
- Prevent Duty Guidance (2023)
- Safeguarding Vulnerable Groups Act (2006)
- Counter Terrorism & Security Act (2015)
- Equality Act (2010)
- Protections of Freedoms Act (2012)
- Sexual Offences Act (2003)

PRINCIPLES OF SAFEGUARDING AT ROYAL HOLLOWAY

10. Employees of Royal Holloway who work with children or vulnerable adults, either on or off campus, as part of university business, will safeguard the wellbeing of all of these individuals in line with the 5 Rs of safeguarding (Recognise, Respond, Report, Record, and Review). Children and vulnerable adults should never experience abuse of any kind and Royal Holloway recognises its important role in safeguarding those who could be affected by the university, including those living on or visiting campus – with awareness of requirements linked to protected characteristics that they may have.
11. Employees of Royal Holloway must report any child protection concerns to the Designated Safeguarding Lead who will investigate as appropriate. This applies to both children and vulnerable adults and the term child will be used to mean both throughout this document. They

may escalate issues directly to the Designated Safeguarding Lead (DSL) where there are clear and serious issues or may contact the Responsible Person within their School or Division for advice first. The key part of the requirement is that concerns are raised when identified, with safeguarding@royalholloway.ac.uk being used as the primary contact.

ROLES AND RESPONSIBILITES (SEE ALSO APPENDIX 4)

DESIGNATED SAFEGUARDING LEAD

12. The Vice-Chancellor and Principal must appoint a Designated Safeguarding Lead (DSL) for the university as well as Responsible Persons (Safeguarding), who will have defined responsibilities for key areas or groups.

13. The DSL will act as act as the contact point for any child protection concerns, provide advice to those working with children or vulnerable adults as required, investigate any safeguarding concerns, and communicate with other relevant bodies to ensure appropriate safeguarding measures and risk assessments are completed. The DSL will nominate a Deputy Designated Safeguarding Lead (DDSL) who will deputise for the DSL in period of absence, support key decision-making processes and be involved in risk assessment processes for safeguarding concerns.

14. The DSL is required to investigate all concerns promptly and sensitively. They will escalate issues as they see fit, including informing the Police or County Council's Adult and Children Safeguarding teams immediately if they believe in child is in immediate danger. It is expected that the DSL shows judgement when dealing with allegations; there can be many innocent explanations for events and not every bruise is evidence of a child being harmed. Accusations of abuse are serious and as such should not be made lightly. If they are in any doubt, they should share their concerns with those they deem it appropriate.

15. After investigation the DSL should take further actions as they deem appropriate which may include:

    - Informing the Police if there is a possible criminal offence.
    - Informing the relevant local authority safeguarding team.
    - Contacting the school or other institution that the child has come from.
    - Referring a case to Human Resources for consideration of internal disciplinary action where there has been suspected misconduct by a Royal Holloway employee.
    - Ensuring that students involved, either as victims or witnesses, receive appropriate support.

16. The DSL will update Executive Board termly, including an overview of Prevent related activity annually. The DSL will provide an annual Safeguarding and Prevent report to the University Council which will be used as submission for the Office for Students annual accountability declaration.

RESPONSIBLE PERSONS (SAFEGUARDING)

17. The Responsible Person nominated for each School or Professional Service whose staff or students work with children or vulnerable adults must define the arrangements for ensuring the safeguarding of within their area of responsibility. This should include the roles, responsibilities and training required for their staff, including assessing requirements for a Disclosure and Barring Service (DBS) check. The key concept should be that staff who have responsibility for or contact with students are able to recognise the signs of potential abuse, who to report them to, and the need to act promptly when they identify a concern.

18. The role is anticipated to be held at School level for the Academy and at Directorate or Divisional level within Professional Services. *Details of the nominated Responsible Persons can be found in Appendix 1 and also within the area specific documents which detail local processes and procedures.* The name of the Responsible Person and area specific procedures must be covered in the induction process for all new staff and students with refresher awareness where appropriate.
19. While day to day responsibilities will be undertaken by the Responsible Person, Executive Deans have responsibility for ensuring that students and staff working with children or vulnerable adults on university business as part of their course work are appropriate trained and supervised. This will apply if the work is on or off campus and includes educational and outreach activities.
20. The Responsible Person must have experience or have been provided training to allow them to complete their role. The expectation will be for the Responsible Person to have completed Level 2 training in the safeguarding of children and young adults. Where circumstances require further training, for example in Academic Schools who provide apprenticeships which are subject to OFSTED requirements, Level 3 training may be appropriate. Where additional training is required, this will be specified by the Responsible Person within the area specific documents.
21. The Responsible Person must escalate any concerns to the DSL immediately they are made aware of them, using the email address safeguarding@royalholloway.ac.uk. Appendix 1 provides a summary of emergency options and referral routes for non-safeguarding student wellbeing issues.

SAFEGUARDING ARRANGEMENTS

ABUSE

22. Abuse can take many forms and may include physical abuse, emotional abuse, sexual abuse and violence, psychological abuse, neglect, radicalisation, financial abuse, domestic violence, and forced marriage. Vulnerable young adults can also be targeted by groups seeking to take advantage of vulnerability. Any suspicion or allegation of abuse must be reported to the Designated Safeguarding Lead or one of the nominated Responsible Persons named in this Policy.

DBS CHECKS

23. The Head of HR Operations must ensure there is a suitable framework for the provision and administration of Basic and Enhanced DBS checks. Guidance for Line Managers on the DBS process can be found at ASD 23.
24. Line Managers must ensure that where a role requires a DBS check any individual in that role completes the check before working one on one with any children or vulnerable adults. Disclosure and Barring Service checks are appropriate for people who it is likely will be in a one-to-one engagement with vulnerable students, such as pastoral support staff and security. Pastoral staff within wellbeing services will require an enhanced DBS check as a condition of employment, as do those teaching on apprentice programs. Where DBS is tied to a role, this should be reflected within the Job Description, including if Basic or Enhanced is required.

FIELDWORK AND TRAVEL

25. Safeguarding must be part of the risk assessment for any fieldwork or fieldtrips. Where there are no safeguarding concerns the topic should not be omitted but a comment made to the effect that it was considered but there are no issues. At the earliest stages of planning checks should be made with the Wellbeing teams as part of preparation for fieldwork or fieldtrips to understand the disclosed vulnerabilities of any participants so an appropriate risk assessment can be completed and discussed with the student to ensure they are supported.

PHOTOGRAPHY ON CAMPUS

26. Marketing and Communications must ensure that any image used by the University that includes children or vulnerable adults is not used unless parental or guardian consent has been provided. Best practice is to capture consent on a written form, but this can be difficult to achieve in some circumstances. It can also be difficult to visually identify anyone who may require safeguarding precaution or who is a vulnerable adult and as such it is recognised that gaining consent can be difficult.
27. Where a vulnerable adult is known to be attending an event then the consent form must be completed in advance. For all other events where filming or photography is taking place, then signs will be put up in prominent positions informing people that filming or photography is taking place. This can be included in any event specific communication and visitors informed verbally at the event. This allows anyone, including Vulnerable Adults, to either avoid the filming or request that their likeness is not used. Please contact the Data Protection Manager for more information. The Responsible Person for the service delivering the event must ensure the requirement for consent before images of children or vulnerable adults are taken is enforced within the remit of their activities.
28. For the University CCTV system and body worn camera systems the Head of Security will ensure an appropriate policy and process is in place including signage and verbal announcements to advise and warn campus users they may be recorded.
29. For photography or video, a written consent form should be completed which will include:
    - Why the photo or video is being taken.
    - What the image(s) will be used for.
    - How long the consent is valid for.
    - How they can withdraw er their consent should they wish to (they must also be made aware that if the image is used online or in printed publications it will be very difficult to withdraw).
    - That they give consent for it to be used in line with the information given above.
30. Images should only be kept for as long as they are needed, subject to the usual data protection principles and policies. A copy of the form can be found here. This also applies to social media and website content produced or managed by teams or areas within Schools and Divisions.

PREVENT DUTY AND RADICALISATION

31. The University acknowledges our statutory duty to have due regard to the need to prevent individuals from being drawn into radicalisation and terrorism. We recognise our role in protecting students from harm whilst maintaining our commitment to freedom of speech, academic freedom, and the great importance we place on diversity and the promotion of equal opportunities for all.
32. Preventing students, apprentices, and staff from being drawn into terrorism, supporting terrorism or terrorist activity is considered one of our safeguarding responsibilities. The University's actions to prevent radicalisation of students is managed through Executive Board with the DSL and Prevent Lead providing regular updates. To support our commitment in this area we have separate policies (i) Prevent Policy and (ii) Safeguarding and the Prevent Duty
33. Where Prevent related safeguarding concerns emerge these should be directed to the Responsible Person who will then escalate them to the DSL and Prevent Lead, or they can be raised directly via safeguarding@royalholloway.ac.uk.

RESEARCH

34. Research proposals must include safeguarding as part of the ethics considerations where applicable. Where funders require it, specific safeguarding plans must be written. Once a

research project is underway it is the responsibility of the Principal Investigator to raise any issues. Please see the Ethics webpages for current policies and guidance.

SEXUAL MISCONDUCT AND HARASSMENT

35. For staff incidents of this nature are covered by the Dignity at Work policy.
36. For students incidents of this nature are covered by the Student Conduct Regulations and the Dignity and Respect Policy

TRAINING

37. Anyone who will work with children or vulnerable adults, including vulnerable students, should be provided with appropriate safeguarding training and awareness of internal sources of referral and support for students.

FURTHER INFORMATION AND GUIDANCE

If anyone considers that this Policy has not been followed or for further information on the interpretation and application of this policy, please contact the policy owner.

Policy Owner	Director of Student Life
Approving Body	Executive Board
Version number	3
Related policies, procedures, and guidelines	College Research Ethics Policy. Dignity & Respect Policy (Students). Dignity at Work Policy (Staff). Prevent Policy. Safeguarding and the Prevent Duty. Student Conduct Regulations.
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