

# Student Safeguarding Policy

## Richmond the American International University in London

January 2021

### University Responsibilities

The University has existing stringent policies and procedures in place designed to safeguard the welfare of all of its students. Ensuring a safe environment for students is a responsibility that is essential to the educational mission of the University. Current safeguarding measures include: 24-hour security staffing; a professionally trained student affairs team, two of who live near campus and are “on-call” for emergencies; a system of “residential directors” and “residential advisors”, students who are hired and trained to act in a pastoral and disciplinary capacity on-campus; a full-time Student Health and Wellness Coordinator on staff, six university counsellors who are available to meet students on an appointment basis at short notice and a host of programmes and services aimed at supporting students from diverse backgrounds through the many challenges they may face while at University.

Although the University’s support and services are extended to all students, vulnerable students are generally those in one or more of the following categories:

**A child:** a person under the age of 18.

**A vulnerable adult:** a person aged 18 years or over who 'is or may be in need of community care services by reason of mental or other disability, age or illness; and is or may be unable to take care of or unable to protect him/herself against significant harm or exploitation'.

**A student at risk of harm:** a person who is at risk of harm or exploitation relating to their physical, mental, psychological wellbeing or potential for being drawn into criminality/terrorism.

This policy is designed to reflect the current legislative context and also take account of relevant guidance and good practice relating to the education sector; to provide protection for the children, young people and vulnerable adults who study at the University; and to provide staff, students, contractors and volunteers with guidance on procedures that must be adopted to ensure safeguarding in relation to children and vulnerable adults and what to do in the event that they suspect a child or vulnerable adult may be experiencing, or be at risk of, harm.

### 1 Disclosure and Barring Service (DBS) Checks

The university is already committed to checking the suitability of some staff and students working directly with children or vulnerable adults (for example, any faculty member teaching on first year programmes has a DBS check as a matter of course). However, many other staff across the university are in regular or significant occasional contact with under-

18s and/or vulnerable adults in the course of their teaching or other work or are in positions of significant trust (eg. Student Affairs staff, security guards, academic advisors).

DBS checks are designed primarily for those in a position of employment involving “substantive unsupervised access” to under-18s and/or vulnerable adults. The University is committed to ensuring that such staff have DBS checks in compliance with UK law, and good HR practice, in order to ensure that their suitability to work with vulnerable students.

Specific guidance on whether staff or students should be subject to a DBS check can be obtained from Human Resources.

## **2 Child Protection Procedures**

The University has appointed a Child Protection Liaison Officer (CPLO). This senior member of the University’s Student Affairs team has responsibility for coordinating the University’s safeguarding practice for under 18s. The CPLO is assisted by several “Designated Officers” to ensure that there is always safeguarding cover available at all times. The contact details of these staff will be held by HR and will be published on the University website.

All University staff must contact the CPLO or a designated officer if they have any cause to believe that a child is in any way at risk.

The designated officer will contact the relevant Social Services department in accordance with the requirements of the Richmond and Wandsworth Safeguarding Adults Board and will follow their instructions.

## **3 Vulnerable Adults**

Where possible, the University identifies vulnerable adults and ensures that there are appropriate support measures in place. This is formalizing reporting arrangements that are already in place in Student Affairs, and which most often occur when the student presents to, or is referred to, Student Affairs, with mental health difficulties or a disability that would meet the legal definition of “vulnerable”.

Any member of staff or contractor across the University with concerns regarding an adult student whom they believe or know to be vulnerable must contact the Student Health and Wellness Coordinator who will liaise with the Vice President for Student Affairs if necessary. Where the concern involves a vulnerable adult, the Vice President for Student Affairs will consult with relevant staff in order to determine the most appropriate course of action. Where abuse is suspected, the Adult Social Care team will be informed in accordance with Richmond and Wandsworth Safeguarding Adults Board guidelines.

### **Guidance to Staff**

**The following general principles are to be adhered to by all staff:**

- It is the responsibility of any staff member to report any concerns with regard to a vulnerable student to the Student Health and Wellness Coordinator and/or the Vice President for Student Affairs.

- If staff, in the course of their work for the university, become aware of an issue with regard to a vulnerable student, either through direct observation of abuse or if it is brought to their notice, or if they have any cause for concern, they must treat this as a priority, and address it immediately.
- If staff wish to seek advice with regard to a specific incident or area of concern, they may consult the Wellness Coordinator and/or the Vice President for Student Affairs.

### **Contractors:**

Contractors are employed by third party organisations to carry out work on behalf of the University. It is the responsibility of the contractor's employer to ensure that all necessary employment and safeguarding suitability checks are completed and to provide assurance to the University that this has been done

### **Training**

The University ensures that the Student Affairs Team receive appropriate training. This training will be passed on by full time professional staff to Residential Advisors and Residential Directors, and any interested staff and faculty members in in-house training sessions.

The University also provides information to raise awareness to ensure that all staff understand what to do if they become aware of a struggling vulnerable student.

### **Recruitment Activities and Admissions**

The University actively recruits in schools both in the UK and in other countries. There will therefore be contact on the part of admissions officers with applicants under the age of 18 and potentially some vulnerable adults. Appropriate guidance and training will be provided for admissions officers in the issues surrounding safeguarding vulnerable people and the University's policies.

On average, the university admits approximately ten students under the age of 18 each academic year. Offers of admission will only be made to those applicants who undertake to comply with the University's child protection procedures, and this will entail notification of the University's policies and procedures in this regard, and a requirement that the student agrees to follow any guidelines (e.g. providing details of next of kin in the event of concerns about their welfare.).

### **Residence Life**

Where a vulnerable student is placed into University residence, the RAs and RDs should be made aware of the situation and ensure that all safeguarding policies are followed.

### **Record Keeping and Confidentiality**

Records are kept of all referrals to the Student Health and Wellness Coordinator/Vice President for Student Affairs and their outcomes, and these will be securely held by Vice President for Student Affairs in accordance with the provisions of the Data Protection Act and now the General Data Protection Regulation. The University complies with the provisions of the General Data Protection

Regulation (UK). All data is securely held in the University and will be treated confidentially and with sensitivity. Under terms of the Regulation, all students, staff and alumni have the right to know their data is used for designated purposes.

It should be noted that consent is still required from under-18s in the same way as for adults with regard to the disclosure of personal information to a third party, however in accordance with statutory requirements, where child protection issues are concerned, it is not possible to offer confidentiality to a person under 18, as any disclosures must be reported.

### **Monitoring and Review**

The implementation of this policy and associated guidance and procedures will be reviewed on a regular basis, in accordance with any changes in legislation.

### **Appendix 1 Designated Staff**

#### **The University's Safeguarding Liaison Officers are:**

Belinda Bains, Student Health & Wellness Coordinator  
[bainsb@richmond.ac.uk](mailto:bainsb@richmond.ac.uk)  
020 8332 8214

Jamie Macleod, Associate Dean for Student Leadership  
[dunnj@richmond.ac.uk](mailto:dunnj@richmond.ac.uk)  
020 8332 8227

Dr Daniel O'Meara, Associate Dean for Career Services & Student Support  
[omearad@richmond.ac.uk](mailto:omearad@richmond.ac.uk)  
020 7368 8301

Dr Allison Cole-Stutz, Vice President for Student Affairs  
[colesta@richmond.ac.uk](mailto:colesta@richmond.ac.uk)  
020 8332 8208

### **Appendix 2 – Guidance for Staff**

If you are concerned about the welfare of a student under the age of 18, please record your concern, and any observations or conversations heard, and report to one of the liaison officers as soon as possible the same day. DO NOT conduct your own investigation.

If your concerns relate to the actions or behaviour of a member of staff (which could suggest that she or he is unsuitable to work with vulnerable students) then you should report this to one of the liaison officers in confidence, who will refer the matter to the President (or to the Board of Trustees if the concern relates to the President)—who will consider what action to take.

## Code of Conduct

The safety and welfare of all students at Richmond is vital. However, staff may find it helpful to have a particular Code of Conduct for dealing with vulnerable students. Providing guidance about acceptable and unacceptable behaviours with such students represents good practice, and can assist staff in making themselves aware of issues with regard to this particular group.

It is important that staff do the following:

- Treat all students with fairness and respect
- Act as a good role model, and challenge any unacceptable behaviour
- Report all allegations or suspicions of abuse
- Remember that your actions may be misinterpreted, no matter how well-intended.
- Avoid situations where there is only one adult/staff member present. In individual advising sessions, leave the door open.
- Be aware that sexual relationships with vulnerable young people (particularly under 18s) are prohibited by law

(whilst a child can consent to sexual activity once they reach the age of 16, under the Sexual Offences Act 2003 it is a criminal offence for a person over 18 (teacher, student peer leader, academic staff etc.) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual)

- With regard to staff and contractors with responsibilities in student accommodation: do not enter a student's bedroom without permission except in an emergency. In the event of an emergency, ensure that someone accompanies you.

## Vulnerable Student in Need of Protection Procedures

These procedures provide step-by-step guidance on how to respond to a concern about a vulnerable student's welfare.

### Causes for Concern

Concerns may arise because:

- A person discloses abuse
- There are suspicions or indicators that a person is being abused.
- There are observable changes in a person's behaviour that may be related to abuse.
- A vulnerable person may abuse another vulnerable person
- The behaviour of a member of staff towards a young person causes concern or there is suspicion that a staff member or volunteer is harming a vulnerable person

The basic premise of a safeguarding procedure is to ensure that vulnerable people who are suffering from harm, abuse and neglect are identified, and that information is shared appropriately to afford them protection and ensure access to requisite services.

## How to Respond if a Vulnerable Person Discloses Abuse

- Stay calm, listen and re-assure the person.
- Check with the person that you have their consent to share the information. If consent is withheld then be clear about the rationale for any decision to override this.
- Record information and ask the young person if what you have recorded accords with what they have said.
- Invite the young person to be party to any discussion with the designated officer
- Make a report to one of the designated officers
- The Designated Officer will decide upon next steps: seeking further advice, informing relevant authorities, etc
- Advise the young person what is going to happen and should it be decided to make a report, seek their consent wherever possible.
- Advise the young person of the outcome of any conversations with outside agencies and what will happen next.

#### **How to respond if there are suspicions a young person is being abused**

- Speak to a Designated Officer
- Keep records of conversations and decisions
- Wherever possible, involve the young person in conversations and keep them informed of any actions or possible outcome.
- Where a referral has been made to an external group, provide a written report

#### **How to respond if there are genuine suspicions a staff member, contractor or volunteer is harming a young person**

- Contact a Designated Officer
- The designated officer should speak to the young person about any actions taken and offer support and advice about what will happen next.
- An internal investigation in consultation with the relevant local authority and police. All information must be recorded
- The designated officer should photocopy the pro forma report and recording forms and store them in an accessible location.
- The member of staff who raises the initial concern must record what they have observed or what the young person disclosed.
- The designated officer should record any subsequent actions, decisions or conversations
- The designated officer is responsible for forwarding written referrals to the relevant local authority
- The designated officer is responsible for storing information in a secure area and ensure that only authorised staff have access to this.
- Follow up should occur within 24 to 48 hours