ICU Safeguarding Code of Practice

This Code of Practice provides detailed guidance to support the application of the Imperial College Union Safeguarding Policy.

Identification of Concern

All staff and student leaders must report any concerns about the welfare of a child or adult at risk immediately. Concerns could arise from direct disclosures, observations, or third-party reports. This includes low level concerns.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working on or on behalf of the College may have acted in a way that is inconsistent with the union values. This could include inappropriate behaviour outside of work.

Broadly when identifying concerns training is provided, however signs of abuse to look out for could be:

- Unexplained injuries such as bruises, burns, or fractures.
- Injuries at different stages of healing.
- Flinching or anxiety about being touched.
- Sudden withdrawal from activities or changes in behavior.
- Delayed emotional development or low self-esteem.
- Demonstrating sexual acts inappropriate for age or physical symptoms like pain in genital areas.
- Consistent poor hygiene or appearance and signs of malnutrition.
- Living in unsanitary or unsafe home conditions.
- Unexplained loss of money or property, or lack of control over personal finances.
- Rigid routines in care settings, inadequate staffing, or poor care standards.

Summary of General Responsibilities for All Teams

Awareness and Training: All team members must complete the required college safeguarding training and the union training. They should refresh this training yearly to stay informed about their safeguarding responsibilities. Managers are responsible for having trained staff.

Approach: All staff should maintain the attitude that a safeguarding issue could happen at ICU and therefore it is vitally important that all staff are trained and aware of the risks.

Reporting: Any concerns about abuse or neglect must be reported immediately through the Safeguarding Reporting Procedure outlined below. This should be done immediately after disclosure or concern. Staff should also speak to their managers who can log the instance on their behalf requiring they know the details of the situation.

Prevention: Each team must assess and mitigate risks associated with their activities, especially those involving direct contact with children or vulnerable adults. Local plans are outlined below. Risk assessments should be created, updated and reviewed regularly.

Partnerships: Staff are responsible for sharing our expectations on safeguarding with students, partners and contractors, they are equally required to abide by these principles.

Reporting

All concerns should first be reported to the individual's immediate manager or supervisor; For student leaders, this is the relevant member of union staff.

At this point any immediate risk will be mitigated by the reporting party and their manager. This should be made note of including the specific details of any observations, time and location, people involved and any contextual information. This should be logged in the Union Safeguarding Log (USL) a MS Form along with the level of escalation and the mitigations put in place.

Should the manager judge the issue to need further escalation, they can speak with another Manager for advice or directly escalate to the Local Safeguarding Officer (the managing director).

For clarity the options are:

Level 1: An assessment of risk is taken by the reporting party's manager or supervisor. This risk is judged to be manageable locally and is logged in the USL as a low-risk issue.

Level 2: Should the manager or supervisor deem the risk to be mitigated by more than one team in the union, the manager will speak with the Local Safeguarding Officer to inform them of the steps taken.

Level 3: Should the Local Safeguarding Officer feel further escalation is needed, they can enact the College Safeguarding Code of Practice level responses outlined. This should be added to the USL by them, and they should inform the staff involved.

When an escalation to Imperial College Safeguarding Committee is needed this will be managed by the Local Safeguarding Officer. Serious cases or those requiring external intervention are forwarded to Imperial College's Director of Safeguarding.

If necessary, the college Safeguarding Leads will coordinate to make referrals to the DBS, police, or local authority designated officers. There is also responsibility for concerns to be raised even if the incident relates to activity outside or not connected to Imperial College.

Documentation

Every safeguarding issue reported must be documented using the Union Safeguarding Log on MS Forms. This captures details of the concern, actions taken. If further escalation is taken by the Local Safeguarding Officer, this will be added to update any submission.

The form captures:

- Reporting Staff Member
- Any other staff involved in responding and reporting safeguarding concern.
- Student ID or Name
- Circumstances that led to reporting
- Date and Time of observations
- Summary of the response or mitigations in place
- Level Of Escalation + Other factors
- Notes Section for Local Safeguarding Officer.

Monitoring and Follow-Up

The Local Safeguarding Officer will monitor the USL to ensure that any trends are addressed in line with similar health and safety policies, that all necessary actions are taken, and support is provided to the individual affected and staff involved.

An annual safeguarding assurance report should go to the Board, along with the review of the policy annually.

Training and Awareness

All ICU staff must complete the Imperial Essentials on safeguarding plus attend a union specific training, which includes detailed instructions on this reporting process.

Student volunteers will be trained in line with the roles they hold through regular sessions across the year. This will be managed locally by the staff members responsible for supporting these student volunteers.

Confidentiality and Data Protection

All safeguarding data must be handled with the highest confidentiality and in line with GDPR and other relevant legislation.

Staff can discuss concerns with their manager without fear of breaking confidentiality and staff will be trained to follow the principle of never promising complete confidentiality.

The Local Safeguarding Officer (Managing Director) and the SLT will have access to the USL.

Contact details of the Local Safeguarding Officer

Email: t.newman@imperial.ac.uk

Phone: +44 20 7594 2862

The college contacts are listed here: www.imperial.ac.uk/human-resources/compliance-and-immigration/safeguarding/contacts-for-further-support-/

Members Under 18s

The union manages the risk associated with members under 18 through the following practices:

1. **Full Members Aged 16 or 17**

Trustee positions: Members aged sixteen or seventeen will not be able to become Trustees of the Union if they are under eighteen on the first day of that term of office.

Elected positions: Except for year representative positions in the Academic Reps Network, members aged sixteen or seventeen will not be able to hold elected office if they are under eighteen on the first day of that term of office.

Voting in elections: Members aged sixteen or seventeen can vote in any election for which they are part of the electorate.

Employment: Members aged sixteen or seventeen will not be employed by the Union until they reach eighteen.

Use of Venues: Where allowed within the license, the Union will make provisions for members aged sixteen or seventeen to attend our venues (for ticketed events, non-ticketed events, and during general opening times). The Union's venues policies will reflect this and include appropriate provisions to ensure that anyone under eighteen cannot

purchase alcohol. It may be necessary for some events to be restricted to those over eighteen, and for the avoidance of doubt, complying with the conditions of our licenses will take precedence over this policy.

Union Volunteering: Members aged sixteen or seventeen will be able to participate in volunteering opportunities offered by the Union which have been evaluated as suitable for individuals of their age by the relevant Union staff member leading the activity in conjunction with any appropriate external opportunity provider. They will not be able to participate in opportunities which have been evaluated as unsuitable for individuals of their age.

Membership of Student Groups: Members aged sixteen or seventeen can become members of Student Groups. Participation in certain activities will require parental consent, as specified.

Participation in Increased Risk Activities: Members aged sixteen or seventeen can participate in increased risk activities subject to a signed parental consent form provided to the Union.

Participation in Residential Activities: Members aged sixteen or seventeen will not be able to participate in residential activities.

Participation in Activities Requiring Specific Legal Consent: Members aged sixteen or seventeen can participate in activities requiring specific legal consent subject to that consent being signed by their parent or guardian and a signed parental consent form provided to the Union.

Participation in Activities Outside the UK: Members aged sixteen or seventeen cannot participate in activities outside the UK.

Cinema: Members aged sixteen or seventeen will not be permitted to attend screenings of films with a British Board of Film Classification of 18 years of age.

2. **Full Members Aged Less Than 16**

Trustee positions: Members aged less than sixteen will not be able to become Trustees of the Union until they are aged eighteen.

Elected positions: Members aged less than sixteen will not be able to hold elected office. The conditions in point 3.2 apply once they become sixteen.

Voting in elections: Members aged less than sixteen can vote in any election for which they are part of the electorate.

Employment: Members aged less than sixteen will not be employed by the Union until they reach eighteen.

Use of Venues: If allowed within the license, the Union will make provisions for members aged less than sixteen to attend our venues during general opening times (but not for events). The Union's venues policies will reflect this and include appropriate provisions to ensure that anyone under eighteen cannot purchase alcohol. For the avoidance of doubt, complying with the conditions of our licenses will take precedence over this policy.

Union Volunteering: Members aged less than sixteen cannot participate in Union volunteering opportunities.

Membership of Student Groups: Members aged less than sixteen cannot become members of Student Groups.

Participation in Increased Risk Activities: Members aged less than sixteen cannot participate in increased risk activities.

Participation in Residential Activities: Members aged less than sixteen will not be able to participate in residential activities.

Participation in Activities Requiring Specific Legal Consent: Members aged less than sixteen will not be able to participate in activities requiring specific legal consent.

Participation in Activities Outside the UK: Members aged less than sixteen cannot participate in activities outside the UK.

Cinema: Members aged less than sixteen will only be permitted to attend screenings of films with a British Board of Film Classification suitable to their age.

3. **Associate and Lifetime Associate Members**

No one will be entitled to become an associate or lifetime member until they reach eighteen.

4. **Parental Consent**

Parental consent must be given by a parent or guardian of any full member aged sixteen or seventeen before they can participate in:

- Increased risk activities
- Activities requiring specific legal consent

A template parental consent form will be provided for this purpose which will be annually activity specific, but not specific to a club or trip.

The Union has a list of increased risk activities. This list is not exhaustive and may be updated from time to time by the Union's Health & Safety Committee. This list is activity-specific, rather than covering individual Clubs, Societies, or Projects. Furthermore, specific one-off activities may be deemed to be high risk and parental consent may be made a requirement.

The Union reserves the right to deem any activity to pose too high a risk, and participation by members aged under eighteen will not be allowed.

If a parent or guardian is not resident in the UK, they must appoint an individual over the age of eighteen who is resident in the UK to act as a contact person.

5. **Student Groups Committee Responsibilities**

Committee members of Student Groups have a duty of care towards their members and must take extra precautions with members aged sixteen or seventeen. The Union will periodically inform Club, Society, or Project Chairs/Presidents of the names of any of their members who are aged sixteen or seventeen. This shall include the date at which they will no longer be a minor.

Student Groups' activities do not involve only students who are paid members. As such it is expected that Club, Society, or Project Chairs/Presidents will monitor the involvement of non-members in their activities.

Club, Society, or Project Chairs/Presidents are expected to ensure that:

- The Union is informed of any students aged sixteen or seventeen participating in their activities who are not members of the Club, Society & Project.
- Parental consent has been given to any students aged sixteen or seventeen in their activities where required.
- Their risk assessments are reviewed to see if they have anyone aged sixteen or seventeen involved in their activities.
- Anyone under eighteen is not consuming alcohol during their events and activities.
- Members aged sixteen or seventeen in their Club, Society, or Project are engaged with to ensure that they are not unduly excluded from their activities.

6. **Other Matters**

Further guidance will be developed to cover Union activities involving working with people aged under eighteen who are not members of the Union. In areas of ambiguity or for circumstances not covered in this document, consultation should be undertaken with the most appropriate member of the Senior Management Team.