

Child & Vulnerable Adult Safeguarding Policy

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Child & Vulnerable Adult Safeguarding Policy

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Overview

Trinity College London (“Trinity”) is committed to proactively safeguarding and promoting the welfare of all individuals who encounter Trinity.

Trinity also believes that “safeguarding is everyone’s business”. This means that it is the responsibility of all individuals working for or with Trinity to respond to any concerns, suspicion or evidence of abuse or neglect to take appropriate action. By individuals stepping up and everyone working to the same ethic, Trinity can better care for and protect those who engage with it. Therefore, Trinity has developed a safeguarding policy and related code and procedure that apply to all individuals operating within its sphere.

The purpose of this safeguarding policy is to protect all individuals, particularly children and vulnerable adults, from any harm that may be caused or identified through their engagement with Trinity. This policy sets out the commitments made by Trinity and informs Individuals and any Partner Organisations of their responsibilities in relation to safeguarding and should be read alongside our other linked policies (see section entitled Safeguarding Framework below). It also reflects the common standard to be followed by the Trinity Group companies where appropriate.

Trinity implements a three-level safeguarding framework to protect all those who interact with the organisation and to safeguard individuals from potential risk.

1. All products and processes are created with a “safe by design” concept which seeks to mitigate safeguarding risks, for instance using age appropriate or avoiding politically sensitive material for our exams.
2. Building safety into all people related processes to provide protection for both parties e.g. carrying out the highest eligible level of Disclosure and Barring Service (“**DBS**”) checks (or equivalent criminal record checks for the individuals working outside of the UK) and rigorous referencing checking for all those who will come into contact with children or vulnerable adults. These processes provide guards to protect against safeguarding incidents occurring. In addition, we provide training through induction and periodically thereafter to reinforce our standpoint on safeguarding and ensure continued vigilance in the detection of safeguarding situations.
3. Finally, if something does go wrong, then we have robust processes in place to enable people to raise a concern quickly and effectively.

Scope

Trinity's Safeguarding Policy must be adhered to by:

- Trinity's Trustees
- All Trinity employees and workers on the payroll
- All fixed term and temporary agency workers engaged by Trinity
- All third-party representatives and other contractors, service providers and partners working with Trinity
- Individuals at companies forming part of the Trinity Group of Companies which includes Trinity College London Press Ltd, Trinity College London (India) Private Ltd, Trinity College London Italy SRL, Trinity College London (Spain) SLU, Trinity College London (New Zealand) Ltd. (Please note that this list is not exhaustive and includes some, but not all, relevant subsidiaries).

NOTE: the word "**Individuals**" refers to all the above throughout this Safeguarding Policy.

Breaches of this policy by individuals will be treated seriously and as a potential cause for disciplinary action (in the case of employees) or termination of the relationship. Breaches by a Trustee may result in termination of their trusteeship.

Trinity's subsidiaries

In relation to subsidiary companies established outside the UK, where there is a conflict between this policy and local safeguarding legislation, the local safeguarding legislation should be followed (subject to taking advice from the Designated Safeguarding Lead or "**DSL**"). However, where this policy imposes more rigorous obligations than local legislation, this policy should apply. Individuals from subsidiary companies (including subsidiary companies established outside the UK) should report any safeguarding concerns to the DSL in the UK in accordance with this policy.

Partners

Trinity may work from time to time in collaboration with Partner Organisations. "**Partner Organisation**" means any organisation which receives funding from Trinity, which collaborates with Trinity to deliver any of its activities (including by providing people's time), or which is otherwise associated with Trinity's name and brand. This policy is intended to work alongside the equivalent policies of Trinity's Partner Organisations, where appropriate. Trinity also expects Partner Organisations to report to us any safeguarding concerns that arise in or are relevant to the context of, their work with Trinity. Partner Organisations, as independent organisations, are ultimately responsible for internally dealing with their own safeguarding. Trinity will ensure that each Partner Organisation has appointed a member of staff who will be responsible for promptly reporting to Trinity's DSL (or, if they are unavailable, the Deputy DSL or other appropriate person) any safeguarding concerns that arise in, or are relevant to the context of the Partner Organisation's work with Trinity.

Policy

Definitions

A **child** is anyone under the age of 18.

A **vulnerable adult** is any person who is aged 18 years or over who, because of their needs for care and support, is unable to protect themselves from either the risk of, or the experience of abuse or neglect. Whether a vulnerable adult or not is something which can change with their circumstances and is not fixed. A vulnerable adult may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation; for example, due to social factors such as poverty, displacement or lack of services or support.

Abuse may be physical, emotional, sexual, financial, discriminatory, organisational or neglectful, and can occur in person or online

Safeguarding Structure

Overall Responsibility: Trustees (including Safeguarding Lead Trustee)



Delegated Authority: Chief Executive Officer



Day-to-Day Responsibility: Designated Safeguarding Lead or, in their absence, Deputy DSL and Executive Leadership Team (ELT)

Roles and Responsibilities

The Trustees have ultimate responsibility for safeguarding across the organisation. They have oversight of Trinity's Safeguarding Policy and all linked policies and procedures and will have oversight of Trinity's handling of safeguarding incidents. The Trustees also have responsibility for approving decisions on whether serious incident reports need to be made to the Charity Commission in relation to safeguarding incidents, following recommendations from the Serious Incident Group.

The Trustees shall appoint one of their number to act as Lead Safeguarding Trustee and Alternate Lead Safeguarding Trustee, respectively. The role of the Lead Safeguarding Trustees will be to act as the first point of contact on the Board for the DSL and the Executive in relation to safeguarding, but the appointment of the Lead Safeguarding Trustees will not detract from the fact that all the Trustees share collective responsibility for safeguarding within Trinity.

The Chief Executive Officer is responsible for ensuring the promotion of a positive safeguarding culture and to support Trinity's Executive team and DSL.

The DSL has day-to-day responsibility for dealing with any concerns about child/adult protection and safeguarding. They are supported by two Deputy DSLs, who can be contacted in the DSL's absence. The role of the DSL is to:

- Provide information and advice on safeguarding, promotion and welfare of children and young people and protection of adults
- Advise Trinity on its training needs on safeguarding and coordinate the delivery of appropriate child and adult protection training
- Notify the Serious Incident Group* of any suspicions, allegations or incidents of abuse, neglect and exploitation and any other safeguarding issues
- Keep other, relevant people within Trinity informed about any action taken and any further action required: for example, disciplinary action against an individual, removal of an individual from an assessment panel, referral to the Disclosure and Barring Service
- Contact and liaise with external agencies, including child/adult protection agencies and law enforcement authorities, as appropriate
- Ensure that an appropriate written record is kept of any referral and action taken, and that this is kept safely and in confidence
- Co-ordinate the distribution of policies and procedures
- Keep safeguarding arrangements under review to ensure that Trinity's policy reflects changes to legislation and is kept up to date in relation to best practice within the charity and education sectors

- Monitor the overall trend of any safeguarding concerns and report to the CEO who will in turn report annually (or more frequently as appropriate) to the Trustees

*The Serious Incident Group is responsible for determining whether an incident is a serious incident as defined by the Charity Commission and for managing that incident.

Principles

Trinity will embed a safeguarding culture (which will safeguard and promote the welfare of children and vulnerable adults) by:

- Ensuring all individuals know how to raise a safeguarding concern
- Taking suspicions or allegations of abuse seriously and taking prompt action through appropriate procedures
- Embedding safeguarding concepts into the product design process
- Building safeguarding into all people related procedures, including recruitment and selection, onboarding, training, and ongoing support of individuals working for Trinity
- Sharing information and co-operating with other agencies/authorities where there are safeguarding concerns
- Managing concerns, allegations and incidents efficiently, including reporting to relevant authorities, such as the Charity Commission and police, as appropriate
- Adhering to safer recruitment and selection procedures, including criminal records checks (at the highest level for which the role is eligible) for all appointments (including equivalent criminal record checks for individuals working overseas)
- Providing a set of procedures, including a code of conduct for all individuals and safeguarding procedures for working with children and vulnerable adults, to promote Trinity's culture and values and setting out how individuals should behave
- Ensuring that data is recorded, stored and used professionally and securely, in line with data protection legislation and guidance (more information about this is available from the Information Commissioner's Office: ico.org.uk/for-organisations)

Trinity encourages a culture of openness and will support anyone who raises a safeguarding concern in good faith. No individual will be subject to detriment for reporting concerns appropriately.

The UK General Data Protection Regulations (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living Individuals is shared appropriately.

Safeguarding Framework

This Safeguarding Policy should be understood as part of a comprehensive set of principles and guidelines that collectively ensure the protection of all individuals who engage with Trinity, (including its own employees/individuals). The framework includes:

- **Safeguarding Procedures:** Issued by the Executive, these procedures detail the steps for implementing this Safeguarding Policy.
- **Safeguarding Code of Practice:** This document outlines the expected standards of behaviour for Trinity employees and other Individuals when interacting with children and vulnerable adults.
- **Code of Conduct:** This code specifies the standards of behaviour required of all individuals in their interactions with colleagues and others encountered through their work with Trinity.

- **Serious Incident Reporting Policy:** This policy provides a framework for when Trustees should report serious incidents, including safeguarding issues, to the Charity Commission.
- **Whistleblowing Policy:** This policy explains how Trinity employees, workers and contractors can raise serious concerns (including concerns relating to how Trinity manages safeguarding) within Trinity or externally.
- **Young People's Images Policy:** This policy outlines how Trinity safely uses images of children.
- **Recruitment Policy:** This policy ensures safe and appropriate recruitment practices.
- **Anti-Harassment and Bullying Policy:** This policy sets out Trinity's commitment to preventing and addressing harassment and bullying.
- **Grievance Policy and Procedure:** This policy outlines the process for addressing grievances of Trinity employees.
- **Disciplinary Policy:** This policy provides the framework for addressing UK Employee disciplinary matters.
- **Complaints Procedure:** This procedure outlines the process for handling complaints.
- **Reporting Malpractice Policy:** This policy establishes a framework for non-Trinity staff to report any suspected malpractice, ensuring that any conduct which breaches regulatory requirements, undermines the integrity of Trinity's qualifications, or risks reputational harm is identified and addressed appropriately. It distinguishes serious misconduct from routine complaints or appeals and supports the maintenance of robust governance, compliance and assessment standards.

These documents collectively form the framework that underpins Trinity's commitment to safeguarding all Individuals who interact with the organisation.

Key Contacts

Name of institution	Safeguarding Role	Contact details
Safeguarding Referral Email Address – monitored by the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads	A shared inbox for safeguarding referrals during usual business hours	safeguardingreferrals@trinitycollege.com
NSPCC Helpline	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
ChildLine	24-hour helpline for children and young people	0800 1111
Ann Craft Trust	Advice can be sought in relation to adults and young people at risk	0115 951 5400 www.anncrafttrust.org
Local Safeguarding Adults Boards (LSAB)	Responsible for protecting an adult's right to live in safety, free from abuse	https://www.local.gov.uk/our-support/partners-care-and-health/safeguarding-resources
Whistleblowing advice line (external)	Advice can be sought from NSPCC if using the Trinity whistleblowing procedure has not resolved the concern.	0800 028 0285 Trinity Ethics Point channel

	Alternatively, Ethics Point is a confidential online or telephone channel through which safeguarding concerns can be reported at any time	
Charity Commission	Charities are required to report serious safeguarding Incidents to Charity Commission	https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Notes

This policy is subject to review at the discretion of Trinity’s ELT and/or as required by changes to legislation. It shall be reviewed at least annually by the Policy Management Group and any changes to the policy shall be subject to the approval of the Trustees.

Trinity will ensure that this policy is publicly accessible on its website.

Change Control

Change History

The following changes have been made to this document:

Version	Date	Author	Change Summary
0.1	2022-05-04	Designated Safeguarding Lead	Document transferred as-is from earlier format
0.3	2024-01-25	Designated Safeguarding Lead	<p>Insertion of dedicated Safeguarding concerns email inbox.</p> <p>Pg 6 Bullet point added under principles RE data controls.</p> <p>Pg 9 additional of 2 final bullet points under 'purpose'</p> <p>Pg 9 addition of 2 final bullet points under 'Responsibilities of all individuals working for Trinity'</p>
0.4	2025.01.28	Designated Safeguarding Lead	<p>Update in definition to 'safeguard and promote the welfare of children and young people'; KCSIE 2024a,</p> <p>Where relevant update to the term 'abuse' to 'abuse, neglect, exploitation'; KCSIE 2024a</p> <p>Page 5: update to the definition of the 'Serious Incident Group'</p>
0.5	2026.03.11	Deputy Designated Safeguarding Lead	<p>Minor textual and formatting amendments throughout the document.</p> <p>Strengthened definition of abuse added for clarity and alignment with safeguarding best practice.</p> <p>URLs updated to ensure accuracy and functionality.</p> <p>New statement included to reinforce openness in reporting, in line with best practice and whistleblowing standards.</p> <p>Policy moved into one central document merging internal and external policy into one.</p> <p>Safeguarding code of practice removed and added to procedures document.</p>

Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
0.1	2022-05-16	Designated Safeguarding Lead
0.2	2022-11-26	Designated Safeguarding Lead
0.3	2024-01-25	Designated Safeguarding Lead
0.3	2024-01-30	Policy Management Group
0.4	2024-03-30	Designated Safeguarding Lead & Policy Management Group
0.5	2026-03-20	Policy Management Group