

Child-Vulnerable Adult Safeguarding Policy

Document Owner:	Phil Bond
Classification:	Public
Document Identifier:	Child-Vulnerable Adult Safeguarding Policy
Internal/External use:	Internal/External
Approval:	Council
Document Status:	Final
Version:	0.1
Date Issued:	01/09/2013
Last Review:	26/11/2022
Last Modified:	26/11/2022
Next Review:	26/11/2023

This document is intended for Trinity College London (TCL) personnel and authorised external parties. This document must be handled in accordance with the TCL classification policy.

Printed copy of this document is uncontrolled and should not be relied upon as the most up to date version.

Child-Vulnerable Adult Safeguarding Policy

Table of Contents

Overview	3
Scope.....	3
Policy.....	4
Trinity’s subsidiaries.....	4
Partners.....	4
Definitions.....	4
Safeguarding Structure	4
Roles and Responsibilities.....	5
Principles.....	6
Safeguarding Framework.....	6
Key Contact Details	7
Notes.....	7
Change Control	8
Change History.....	8
Change Approval.....	8
Appendix – Safeguarding Code of Practice.....	9
Purpose	9
Expectations.....	9
Related Policies and Procedures.....	9
Responsibilities of all Staff	9
Appropriate Behaviour	9
Working Online – Additional Considerations.....	10
Upholding this code	11
Breaches.....	11

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 by taking 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 procedures that apply to all individuals operating within its sphere.

The purpose of this safeguarding policy is to protect people, particularly children and vulnerable adults, from any harm that may be caused due to their meeting Trinity. This policy sets out the commitments made by Trinity and informs Trinity’s Staff and any Partner Organisations with which Trinity collaborates 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 adhered to across the Trinity Group Companies.

Trinity has three lines of defence in relation to safeguarding to protect those that meet with Trinity as well as protecting its Staff against 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 eg carrying out the highest eligible level of DBS checks (or equivalent criminal record checks for the Staff 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:

- All Trinity employees on the payroll;
- All fixed term and temporary agency workers engaged by Trinity;
- Consultants and contractors including all members of Trinity’s Panels (including examiners, assessors, moderators, proctors, inspectors, quality assurance monitors and trainers);
- All individuals acting as Trinity’s representatives or agents;
- Trustees

NOTE: the word ‘Staff’ refers to all the above throughout the policy and procedures.

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

Policy

Trinity's subsidiaries

Staff at companies forming part of the Trinity Group of Companies are expected to follow this Safeguarding Policy wherever appropriate.

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). However, where this policy imposes more rigorous obligations than local legislation, this policy should apply. Members of Staff from subsidiary companies (including subsidiary companies established outside the UK) should report any safeguarding concerns to the Designated Safeguarding Lead in the UK in accordance with this policy.

Partners

Trinity may from time-to-time work 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 staff 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 expects that the principles and approaches already shared with Partner Organisations mean that they will fully support the values and commitments set out in this policy.

Partner Organisations, as independent organisations, are concerns 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 Designated Safeguarding Lead (or, in the event that they are unavailable the Deputy Designated Safeguarding Lead or other appropriate person) any safeguarding concerns that arise in, or relevant the context of the Partner Organisation's work with Trinity.

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.

Safeguarding Structure

Overall Responsibility: Trustees (including Safeguarding Lead Trustee)



Delegated Authority: Chief Executive Officer



Day to Day Responsibility: Designated Safeguard Lead ("DSL") or, in their absence, Deputy DSL and Executive Team

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 Serious Incident Group.

The Trustees shall appoint one of their number to act as Safeguarding Trustee. The role of the Safeguarding Trustee will be to act as the first point of contact on the board for the Designated Safeguarding Lead and the Executive in relation to safeguarding, but the appointment of a Safeguarding Trustee 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 positive safeguarding culture and to support Trinity's Executive team and Designated Safeguarding Lead.

Phil Bond, Director UKI, is the Designated Safeguarding Lead (DSL). The DSL has day-to-day responsibility for dealing with any concerns about child/adult protection and safeguarding. There are two Deputy DSLs, who can be contacted in the DSL's absence, Jack Toner, Customer Service Team Leader and Catherine Sercombe, Head of Performance.

The role of the DSL is to:

- Provide information and advice on safeguarding and child/adult protection for Trinity Staff;
- Advise and organise Trinity of child/adult protection training needs;
- Notify the Serious Incident Group* of any suspicions, allegations or incidents of abuse and other safeguarding issues;
- Keep other, relevant people within Trinity informed about any action taken and any further action required: for example, disciplinary action against a member of Staff, removal of an examiner from a 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 serious and for managing that incident. It comprises the following members of the Executive: Chief Executive Officer, Chief Finance Officer, General Counsel, Executive Director, Quality and Standards, and the DSL. It shall notify the General Counsel and the Trustees of any serious incidents and assist the Trustees with making a Serious Incident Report to the Charity Commission (via the General Counsel) whenever the Trustees decide that it is necessary to do so.

Principles

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

- ensuring all Staff 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 Staff;
- 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 members of Staff working overseas);
- providing effective management of all Staff through support and training;
- providing a set of procedures, including a code of conduct for all Staff and safeguarding procedures for working with children and vulnerable adults, to promote Trinity's culture and values and setting out how Staff should behave;
- using these tools to embed safeguarding as a key principle throughout the organisation.

The General Data Protection Regulations (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 read alongside the following linked policies which together set out the framework by which Trinity safeguards all persons who encounter Trinity (including its own Staff):

- Child/Adult Safeguarding Procedures – which set out the procedures which Trinity follows to safeguard children and vulnerable adults in compliance with the statutory regime for safeguarding of vulnerable groups
- Safeguarding Code of Practice – which sets out the standards of behaviour expected of Trinity Staff when working with children and vulnerable adults (which is annexed to this policy)
- Code of Conduct – which sets out the standards of behaviour expected of all Trinity Staff, including in relation to their dealings with other Staff and anyone else they encounter through their work for Trinity
- Policy on Serious Incident Reporting – which sets out a framework for when the trustees will report serious incidents to the Charity Commission (which includes serious safeguarding incidents)
- Whistleblowing Policy – which explains how Staff can raise serious concerns (including concerns relating to how Trinity manages safeguarding) within Trinity or externally
- Young People's Images Policy – which sets out how Trinity will use images of children safely
- Recruitment Policy
- Harassment and Bullying Policy
- Grievance Policy
- Employee Disciplinary Policy
- Complaints Process

Key Contact Details

Name and Job Title	Safeguarding Role	Contact details
Phil Bond, Director SELT	Designated Safeguarding Lead	+447469 035521 phil.bond@trinitycollege.com
Jack Toner, Customer Service Team Leader.	Deputy Designated Safeguarding Lead	+44 7447935958 jack.toner@trinitycollege.com
Catherine Sercombe, Head of Performance	Deputy Designated Safeguarding Lead	0207 820 3367 catherine.sercombe@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	01159515400 www.anncrafttrust.org
Local Safeguarding Adults Boards (LSAB)	Responsible for protecting an adult's right to live in safety, free from abuse.	www.local.gov.uk/topics.social-care/safeguarding-resources
Whistle blowing advice line (external)	Advice can be sought from NSPCC if using the Trinity whistleblowing procedure has not resolved the concern	0800 028 0285
Charity Commission	Charities are required to report 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 Executive 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, following any recommendations from the Executive.

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	Darren Iddon	Document transferred as-is from earlier format
0.2	2022-11-26	Phil Bond	Removed Daniel Egan as Deputy Designated Safeguarding Lead. Added Jack Toner as Deputy Designated Safeguarding Lead

Change Approval

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

Version	Date	Approver
0.1	2022-05-16	Phil Bond – Designated Safeguarding Lead
02	2022-11-26	Phil Bond - Designated Safeguarding Lead

Appendix – Safeguarding Code of Practice

Purpose

The purpose of this code is to:

- Keep children and vulnerable adults safe by clarifying behaviours which support their safety and behaviours to be avoided
- Assist safe and responsible working practice
- Set clear expectations of behaviour and practice
- Reduce risk of positions of trust being abused or misused
- Reduce the risk of misplaced or malicious allegations against staff

Expectations

All Trinity staff and associates are required to uphold the highest levels of professional conduct in their dealings with children and vulnerable adults.

Trinity is responsible for making sure that this code is made available to all staff. Staff must read and agree to follow the code and ensure they understand the consequences of inappropriate behaviour.

In your role at Trinity, you are acting in a position of authority and have a duty of care towards the children and vulnerable adults we work with.

Related Policies and Procedures

- Safeguard Policy
- Whistleblowing
- Child/Vulnerable Adult Safeguarding Procedures
- Code of Practice
- Code of Conduct
- Policy on Serious Incident Reporting
- Young People's Images Policy
- Recruitment Policy

Responsibilities of all Staff

- The welfare of children and vulnerable adults should be prioritised at all times.
- All working environments should be safe. Follow the principles in the safeguarding policy.
- Work within the law at all times.
- Model good behaviour.
- Challenge unacceptable and inappropriate behaviour.
- Report concerns about abusive behaviour to the Designated Safeguarding Lead following the Child/Vulnerable Adult Safeguarding Procedures.
- Report any breaches of the code to The DSL or Deputy DSL

Appropriate Behaviour

Adults who work with children/vulnerable adults are responsible for their own actions and behaviours.

Staff and associates must:

- conduct their work as openly and honestly as possible
- apply the same professional standards to all children regardless of culture, disability, gender, language, ethnicity, religion/belief, gender identity or sexual orientation

- promote relationships which are based on trust, patience and respect
- dress in a way that promotes a positive and professional image appropriate to your role
- ensure communication with children/vulnerable adults is appropriate to their age and understanding
- keep communication with children/vulnerable adults relevant to your work
- restrict time spent alone with a child/vulnerable adult to the time required to conduct the examination or assessment
- model good practice and appropriate conduct
- value and respect children/vulnerable adults as individuals
- treat all children/vulnerable adults equally, with respect and dignity, report any concerns or allegations following the Child/Vulnerable Adult Safeguarding Procedures
- Adults should avoid conduct which would lead any reasonable person to question their motivation or intentions.
- When working with children/vulnerable adults you must not:
 - show favouritism
 - smoke, consume alcohol, or use illegal substances
 - have physical contact with a child/vulnerable adult. Any physical contact, however well intentioned (for example if the candidate is upset) could be misconstrued by the candidate or an observer. Be aware of cultural or religious views regarding physical contact and be sensitive to issues of gender
 - be alone with a child/vulnerable adult other than during the time required to conduct the examination or assessment (in person or online)
 - be unnecessarily inquisitive – do not ask for personal details that are not necessary for completion of the assessment
 - do or say anything that might make a candidate feel uncomfortable including being aggressive, hostile, sarcastic or impatient
 - swear or use derogatory or sexually suggestive language
 - engage in any form of sexual contact with a child/vulnerable adult
 - be drawn into personal conversations or introduce personal subjects with candidates
 - make comments that could be misinterpreted, such as about a candidate's appearance
 - meet a candidate other than in the agreed assessment venue/online platform
 - exchange personal contact details including email or phone numbers
 - contact a child/vulnerable adult through any form of social media
 - permit a child/vulnerable adult to swear or use sexualised language unchallenged
 - permit a child/vulnerable adult to use language that aims to radicalise by supporting terrorism and forms of extremism leading to terrorism

The above also applies to working virtually/working online. There are additional considerations to online working below.

Working Online – Additional Considerations

You must:

- Always use an account and device that is authorised by Trinity for the purposes of your work
- Ensure all online communication is relevant to your work/purpose
- Be appropriately and professionally dressed as you would be for face-to-face work
- Be in a suitable environment which is appropriate to the task/work – a living or communal area if you are working at home. It is not appropriate to be in a bedroom unless you either use a Zoom background or your background is blurred.
- Use a neutral background and remove any personal information that could be seen on screen. Be aware of photographs, identifying features, art on walls and mirrors in the room

- Close any unnecessary tabs and mute notifications
- You must not:
- Use personal or unauthorised accounts, emails, and social media to communicate directly with children/vulnerable adults
- Share your personal contact details, email address, mobile phone number, social media account details with candidates
- Use technology to develop inappropriate relationships or engage in any form of online sexual contact with candidates
- View, download, create, distribute any material which is inappropriate, for example, pornography or criminal, relating to the sexual abuse of children/vulnerable adults

Upholding this code

All staff should always follow this code.

Do not rely on your reputation or that of Trinity to protect you.

If you have behaved inappropriately you will be subject to investigation and further action.

Trinity may also report your behaviour to statutory agencies such as the Police.

Breaches

If you become aware of any breaches of this code, you must report them to the DSL or deputy DSL as soon as possible.