

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 people, 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 has three lines of defence in relation to safeguarding to protect those that meet with Trinity as well as protecting Individuals 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 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 TCL Press, TCL India, TCL Italy, TCL Spain, TCL SELT

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 by other means. 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 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 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 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 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.

Safeguarding Structure

Overall Responsibility: Trustees (including Safeguarding Lead Trustee)



Delegated Authority: Chief Executive Officer



Day-to-Day Responsibility: Designated Safeguard 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 of Trustees 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 Designated Safeguarding Lead.

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 and organise Trinity of child safeguarding and adult protection training needs
- 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 effective management of all Individuals through support and training
- 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
- Using these tools to embed safeguarding as a key principle throughout the organisation
- 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)

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 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 the process for raising serious concerns, including those related to safeguarding management, either 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.
- **Disciplinary Policy:** This policy provides the framework for addressing Employee and Individuals disciplinary matters.
- **Complaints Procedure:** This procedure outlines the process for handling complaints.

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

Key Contact Details

Name and Job Title	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	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
Whistleblowing advice line (external)	Advice can be sought from NSPCC if using the Trinity whistleblowing procedure has not resolved the concern. Alternatively, Ethics Point is a confidential online or telephone channel through which safeguarding concerns can be reported at any time	0800 028 0285 Trinity Ethics Point channel
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 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	[Job title]	Document transferred as-is from earlier format
0.3	2024-01-25	Designated Safeguarding Lead	Insertion of dedicated Safeguarding concerns email inbox. Pg 6 Bullet point added under principles RE data controls. Pg 9 additional of 2 final bullet points under 'purpose' Pg 9 addition of 2 final bullet points under 'Responsibilities of all Individuals working for Trinity'
0.4	2025.01.28	Designated Safeguarding Lead	Update in definition to 'safeguard and promote the welfare of children and young people'; KCSIE 2024a, Where relevant update to the term 'abuse' to 'abuse, neglect, exploitation'; KCSIE 2024a Page 5: update to the definition of the 'Serious Incident Group'

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

Safeguarding Code of Practice

Purpose

The purpose of this code is to:

- Keep children and vulnerable adults safe by clarifying behaviors which promote and support their welfare and 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 Individuals
- Ensure all Individuals, including panel members and associates, can recognise welfare issues and the signs of abuse, neglect and exploitation
- Ensure all safeguarding concerns are swiftly and efficiently identified and escalated to the DSL or safeguarding team, or where appropriate to an external agency.

Expectations

All Individuals 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 Individuals working for Trinity. They 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.

Responsibilities of all Individuals

- 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 by following the Safeguarding Procedures
- Report any breaches of the code to the DSL or Deputy DSL
- All Individuals are responsible for monitoring for signs and symptoms of abuse, neglect and exploitation

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

Individuals must:

- Conduct their work as openly and honestly as possible

- Apply the same professional standards to all children and adults 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, assessment or work-related duties
- 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 by following the 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, assessment (in person or online) or work-related duties
- Be unnecessarily inquisitive – do not ask for personal details that are not necessary for completion of the assessment or work
- 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 Individuals 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 a Deputy DSL as soon as possible.