



## **Safeguarding Policy**

### **Policy Details**

Policy Owner:	Head of Membership Services
Approved by:	Organisational Development Subcommittee
Date Approved:	
Date Last Reviewed:	January 2026
Reviewed by:	Laura Black, Head of Membership Services
Next Review Due:	January 2027

### **1. Purpose**

1.1 The purpose of this policy is to demonstrate the commitment of Kingston Students' Union to safeguarding adults and children and to ensure that everyone involved in KSU is aware of:

- i. The legislation, policy and procedures for safeguarding adults and children.
- ii. Their role and responsibility for safeguarding adults and children.
- iii. What to do and who to speak to if someone has a concern relating to the welfare of an adult or child within Kingston University or Students' Union.

### **2. Scope**

2.1 This safeguarding policy and associated procedures apply to all individuals involved in KSU including Board members, staff, student leaders and members.

2.2 It is concerned with the safety of adults and children whilst taking part in our organisation, its activities and in the wider community.

2.3 The policy applies to activities that take place on university premises as well as off-site activities for which the Students' Union is responsible.

### **3. Definitions**

3.1 KSU – Kingston Students' Union

- 3.2 Child – A person or persons under the age of 18 years. The individual may be studying at or visiting the University, or a student may disclose a situation where a child(ren) is at risk of harm, for example, domestic abuse.
- 3.3 Adult at Risk – An individual aged 18 or over who has care and support needs (whether or not the Local Authority is meeting those needs), and is experiencing, or at risk of abuse and neglect and as a result of those care and support needs is unable to protect themselves from abuse and neglect or the risk of it.
- 3.4 Designated Safeguarding Lead (DSL) - The senior staff member responsible for safeguarding and welfare across KSU, acting as the first point of contact for any safeguarding concerns. At Kingston Students' Union, this is the Head of Membership Services: **Laura Black (l.black@kingston.ac.uk)**.
- 3.5 Deputy DSL - Supports the DSL and acts in their absence to respond to safeguarding concerns and assist with policy implementation. At Kingston Students' Union, this is the Student Communities & Events Manager: **Nicole Soriano (n.soriano@kingston.ac.uk)**.
- 3.6 Safeguarding Officer – A trained member of staff who supports the implementation of safeguarding procedures. They may receive disclosures, identify potential concerns, provide initial support and ensure concerns are reported promptly. At KSU, this is the Academic Advisor: **Meymun Khalif-Musse (M.Khalif-Musse@kingston.ac.uk)**.

#### **4. Policy Statement**

- 4.1 KSU believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.
- 4.2 KSU is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.
- 4.3 KSU acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all those involved.
- 4.4 KSU recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

- 4.5 KSU recognises that there is a legal framework within which KSU needs to work to safeguard children and adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding legislation and with local statutory safeguarding procedures.
- 4.6 Actions taken by KSU will be consistent with the principles of safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the individual concerned.
- 4.7 Everyone involved with KSU is aware of the safeguarding procedures and knows what to do and who to contact if they have a concern.
- 4.8 Any concern is taken seriously, responded to promptly and followed up in line with KSU's Safeguarding Policy.
- 4.9 Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
- 4.10 Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy.

## **5. Responsibilities**

- 5.1 Board of Trustees – Responsible for setting and monitoring strategy and policy for safeguarding within KSU, monitoring safeguarding performance and seeking reassurance that performance is satisfactory and reporting to the Charity Commission if a serious incident happens or is suspected to have taken place in relation to KSU.
- 5.2 SU Designated Safeguarding Lead – Responsible for liaising with the university on matters of safeguarding and ensuring this policy is up to date, ensuring the SU is complying with the safe recruitment of staff and students in line with the University's Safeguarding Policy, the design and implementation of safeguarding procedures, monitoring safeguarding performance across KSU and providing reports to the Board of Trustees and facilitating referrals to the University's Safeguarding Officer.
- 5.3 SU Deputy Safeguarding Lead – Supports the Designated Safeguarding Lead in all aspects of safeguarding. Acts as the first point of contact in the DSL's absence, assists with responding to safeguarding concerns, helps implement and monitor

safeguarding policies and procedures, maintains accurate and confidential records, and supports staff and student leaders in understanding their safeguarding responsibilities.

5.4 Safeguarding Officer – Supports the DSL and Deputy with safeguarding matters, ensuring procedures are implemented and concerns are reported. In their role, they are more likely to receive disclosures and be an initial point of contact.

5.5 Management Team – responsible for having an appropriate awareness of the safeguarding policy and the requirements of legislation as they apply to the work of their department/team, ensuring that staff, student leaders and volunteers are made aware of and understand the safeguarding policy along with its related procedures, ensuring that staff who require a DBS check for their work complete this and ensuring staff complete their safeguarding training.

5.6 All Staff and Student Leaders – responsible for co-operating with supervisors and managers on safeguarding matters and reporting any safeguarding concerns to the SU Designated Safeguarding Lead or Deputy in accordance with procedures.

## **6. Procedures**

### **6.1 Identifying a Safeguarding Concern**

6.1.1 A safeguarding concern is any information, observation, disclosure, or suspicion that a person may be experiencing, or is at risk of, harm, abuse, or neglect.

6.1.2 For adults, safeguarding duties under the Care Act 2014 apply where an individual has care and support needs and, because of those needs, is unable to protect themselves from abuse or neglect. For children, safeguarding duties apply where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

6.1.3 A concern may arise when an individual:

- Discloses abuse or neglect (about themselves or another person)
- Presents indicators that may suggest abuse or neglect
- Is under 18 and involved in KSU activity
- Appears unable to keep themselves safe due to possible care and support needs as defined by the Care Act 2014
- Is affected by circumstances that may place them or others at risk of abuse or neglect during SU activity

6.1.4 Safeguarding concerns may involve the following categories of abuse and neglect:

- Physical abuse
- Domestic abuse

- Sexual abuse
- Psychological abuse
- Financial abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect
- Self-Neglect
- Forced Marriage
- Female Genital Mutilation (FGM)
- Radicalisation

6.1.5 Staff are not required to determine whether abuse or risk has occurred. If a concern exists, it should be reported following the steps outlined in 6.2.

6.1.6 Not all concerns are safeguarding concerns. Welfare concerns relate to wellbeing or support needs where there is no information indicating abuse or neglect (e.g. stress, low mood, academic pressure, relationship difficulties without abuse, financial hardship without exploitation). Welfare concerns are usually addressed through support and signposting to the University wellbeing services.

6.1.7 Disclosures of self-harm or suicidal ideation are usually managed as welfare and mental health concerns, unless there are indicators of abuse or neglect, or the safeguarding threshold may be met (for example, where there is significant impairment affecting an individual's ability to keep themselves safe). Where there is an immediate risk to life or serious harm, this must be treated as an emergency and referred immediately to 999 and/or University Security. Where there is ongoing or credible risk of harm, but no immediate emergency, the concern should be referred to the University's Report & Support process to enable appropriate follow-up and support, alongside any immediate signposting or support offered by KSU. Consent is not required to refer to the University where sharing information is necessary to protect the individual or others. The KSU Designated Safeguarding Lead must be informed of all such disclosures for oversight, risk assessment and monitoring purposes.

6.1.8 A low-level concern is not a safeguarding concern. It does not indicate that a student is at risk of serious harm, but may involve behaviours that are unprofessional, inappropriate, or raise minor worries. Examples include a student appearing distressed without indicating risk to self or others, minor boundary issues, or isolated incidents of poor judgement. Staff do not need to formally report low-level concerns but may seek advice or guidance from the DSL if unsure how to respond. Support, signposting, or internal guidance should be provided as appropriate.

6.1.9 If a staff member is unsure whether a concern is a safeguarding concern or not, they can still seek guidance from the DSL.

## 6.2 Reporting a Safeguarding Concern

6.2.1 Any safeguarding concern identified by or reported to SU staff must be reported to the Designated Safeguarding Lead or Deputy DSL via the KSU Safeguarding Concern Form. This includes situations where staff are unsure whether a concern is safeguarding.

6.2.2 The DSL will review the concern, assess the level of risk, and take any necessary immediate safeguarding actions including relating to SU activities (e.g. risk management within events, safety planning etc.). Where a concern is assessed as low-level or welfare-related, the DSL will advise the staff member on appropriate next steps such as signposting or referral to internal or university support.

6.2.3 Response times:

- Urgent safeguarding concerns (immediate risk of serious harm): staff should take emergency action immediately and the DSL should be informed as soon as possible.
- Safeguarding concerns will otherwise be responded to within 24 hours.
- Low-level concerns: The DSL will respond within 3-5 working days.

6.2.4 Where a concern primarily relates to mental health or wellbeing, and there is no indication of abuse or neglect, the University's Report & Support system will normally be the primary route for onward support. The KSU DSL should still be informed for oversight and monitoring purposes, and to consider whether any SU-specific actions are required.

6.2.5 Where a safeguarding concern is identified, the Designated Safeguarding Lead (or Deputy) will determine whether information must be shared with the University or other relevant agencies in order to protect the individual or others from harm. Kingston Students' Union is a separate organisation from Kingston University. However, where a safeguarding concern or mental health crisis involving risk of harm is identified, relevant information will be shared with the University without delay to enable appropriate safeguarding action, wellbeing support and case management. Wherever possible, the individual will be informed that information is being shared, unless doing so would increase risk. Information sharing will be proportionate, limited to what is necessary, and recorded in line with data protection requirements. Information will be shared with or without consent where it is necessary to:

- Protect the individual or others from actual or potential harm
- Respond to a child protection concern
- Comply with a legal or safeguarding duty

6.2.6 Where a referral to the University is made, this will be done within 24 hours of the DSL receiving the report. The SU will manage risks relating to SU activities, environments or individuals while the University will normally lead on wider student case management, wellbeing support and processes where applicable. The University will provide the SU with relevant updates, where possible, or any further required action from the SU.

6.2.7 Where there is an immediate risk to life or serious harm, any member of staff may take emergency action including contacting 999 and/or University Security (ext.6666) if appropriate. To clarify, staff do not require permission from the DSL to call 999 if they feel there is an immediate risk to life or serious harm. Where possible, a Mental Health First Aider should be contacted for support. The following are examples of when an urgent response is required:

- Suicidal behaviour
- Harming or threat to harm others
- Behaviour that directly/indirectly puts self or others at risk of harm
- Any immediate concern of child protection

6.2.8 The DSL should be informed as soon as possible following any emergency response. Once immediate risk is addressed, the DSL will determine and coordinate any further safeguarding or welfare actions, including referral to the University as soon as practicable after the incident to enable appropriate follow-up and ongoing support.

6.2.9 Records of all concerns and actions taken will be securely stored by the SU in line with data protection requirements. An annual report will be shared with the KSU Trustee Board.

### 6.3 Responding to a Disclosure

6.3.1 A disclosure is when an individual shares information that suggests they or someone else may be at risk of harm, experiencing abuse, or requires safeguarding support.

6.3.2 When receiving a disclosure, staff must:

- Listen calmly without judgement
- Reassure the person that they have done the right thing by speaking up
- Allow the person to share information freely, without interruption
- Explain that you cannot guarantee confidentiality and that the concern will need to be shared with the Designated Safeguarding Lead to ensure appropriate support and safety
- Record factual information using the KSU Safeguarding Concern form as soon as possible
- Report the concern directly to the DSL or Deputy without delay

6.3.3 Staff must not:

- Promise confidentiality
- Ask leading questions, probe for detail, or investigate the concern themselves
- Make decisions about next steps or referrals

- Share information with anyone other than the DSLs unless there is immediate risk to life or serious harm, in which case emergency services and/or University Security should be contacted
- Minimise, dismiss or make assumptions about the situation

#### 6.4 Safeguarding Under-18s in KSU Activities

6.4.1 KSU welcomes involvement from under-18 members but recognises their additional vulnerability and the legal protections afforded to students. All staff and student leaders have a responsibility to ensure that the safety and welfare of under-18s is prioritised across all SU activity. This includes compliance with statutory safeguarding duties relating to children.

6.4.2 The SU will maintain a live register of under-18 members each academic year, based on University data within MSL. This register will be used to support appropriate safeguarding planning, risk assessment and controls.

6.4.3 Under-18s will be automatically restricted from purchasing products or tickets designated as alcohol related or 18+ within the SU systems.

6.4.4 Where an under-18 wishes to join a sports club or society, they will need to notify KSU in advance. The relevant coordinator, with oversight from the Designated Safeguarding Lead will:

- Engage with the committee of the student group and go over key safeguarding principles and expectations
- Work with the committee to complete an appropriate safeguarding risk assessment
- Ensure appropriate safeguarding measures are put into place
- Confirm any coaches meet requirements (e.g. DBS checks)

6.4.5 Under-18s must not attend or participate in:

- Events primarily involving alcohol consumption
- Overnight residentials without specific risk assessment, parental/carers consent and relevant safeguarding measures (e.g. DBS checks)
- Activities deemed inappropriate due to their age or vulnerability, as determined by the DSL

6.4.6 All event risk assessments should include a safeguarding section. Where under-18 attendance is expected, additional controls must be considered and implemented where appropriate (e.g. designated welfare support, wristbands etc.)



6.4.7 Any safeguarding concern relating to an under-18 involved in SU activity must be reported immediately to the DSL and managed in line with this policy and its related procedures.

#### 6.5 Safeguarding during SU Activities

6.5.1 All SU staff and volunteers involved in organising or supervising events are responsible for safeguarding the wellbeing of all attendees, including adults at risk and under-18s.

6.5.2 All SU activities must be planned and delivered with due regard to safeguarding and welfare. Safeguarding risk must be considered in all event risk assessments, including controls for under-18 where relevant.

6.5.3 Any safeguarding concerns arising during an SU activity must be reported in line with this procedure.

6.5.4 For 1:1 advice appointments or meetings, staff must ensure a safe working environment, including having access to a room with a panic alarm system.

#### 6.6 Safeguarding disclosure form and recording

6.6.1 All safeguarding concerns must be recorded promptly and accurately using the KSU Safeguarding Concern Form. This applies to staff and student leaders involved in KSU activities.

6.6.2 Completed forms must be submitted to the Designated Safeguarding Lead or Deputy immediately.

6.6.3 The DSL/Deputy is responsible for:

- Maintaining a secure, central log of all safeguarding concerns
- Ensuring records are stored in line with data protection legislation
- Escalating concerns to the University via the Report & Support system where appropriate
- Retaining records for audit, monitoring and annual reporting purposes

### **7. Safeguarding and the Prevent Duty**

7.1 Kingston Students' Union recognises its responsibility to have due regard to the need to prevent people from being drawn into terrorism, in line with the Counter-Terrorism and Security Act 2015 (the Prevent duty).

7.2 KSU understands radicalisation as a safeguarding concern, not a disciplinary or criminal issue. Concerns may relate to adults or children and may arise where an individual is vulnerable to exploitation, coercion, or harmful ideologies.

7.3 Staff and student leaders are not expected to assess risk or determine whether radicalisation has occurred. Any concerns about possible radicalisation or extremism must be reported to the Designated Safeguarding Lead in line with this policy.

7.4 Where appropriate, and following risk assessment and information-sharing considerations, the Designated Safeguarding Lead will liaise with Kingston University in accordance with the University's Prevent procedures.

## **8. Related Policies, Documents and Legislation**

8.1 This safeguarding policy should be read alongside the following policies and guidance:

- KSU Data Protection Information Policy
- KSU Whistleblowing Policy
- KSU Lone Working Policy
- KSU Complaints Policy
- KSU Advice Confidentiality Policy
- KSU Panic Alarm Policy
- KSU Privacy Policy
- KSU Under 18 Members Policy
- Kingston University Safeguarding Policy

8.2 This policy should be read and applied alongside, and in compliance with, the following legislation and statutory guidance

- Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- Data Protection Act 2018
- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- Forced Marriage (Civil Protection) Act 2007
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015

8.3 KSU recognises that safeguarding legislation and guidance may change over time and is committed to reviewing this policy and associated procedures to ensure continued compliance with statutory requirements and best practice.

## **9. Monitoring and Review**

9.1 The KSU Designated Safeguarding Lead is responsible for monitoring compliance with this policy and reporting to the Senior Management Team and Trustee Board.

9.2 Monitoring includes:

- Maintaining the central safeguarding log
- Tracking completion of safeguarding training by staff
- Reviewing incidents, disclosures, and any near-misses to identify trends and improvement opportunities

9.3 This policy will be formally reviewed every three years, or sooner if there are changes in legislation, University guidance or KSU operational practice.

9.4 An annual safeguarding report will be prepared by the DSL for the Trustee Board, summarising:

- Number and type of safeguarding concerns reported
- Actions taking within SU activities
- Referrals made to Kingston University
- Training completion and compliance