

Safeguarding Policy

Document Date:	February 2022
Purpose:	To set out RHSU's approach to safeguarding to ensure transparency amongst our stakeholders.
Audience:	RHSU Board of Trustees RHSU Staff RHSU Members

1. Introduction

- 1.1 RHSU represents and provides services and activities for all students at Royal Holloway, University of London. Whilst the vast majority of students are aged 18 years or over, our membership also includes a limited number of individuals classed as from a 'vulnerable group' (i.e. those under 18, and those over 18 as defined in the Protection of Freedoms Act 2012).
- 1.2 In accordance with the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and associated legislation, RHSU has a statutory duty to safeguard and promote the welfare of children or to protect the safety and welfare of vulnerable groups and recognises that:
- i. The safety and welfare of children and vulnerable adults is of paramount importance.
 - ii. Everyone who works with children and vulnerable adults has a responsibility to safeguard their welfare and report any concerns.
 - iii. Staff, students and volunteers must be protected from unsubstantiated allegations of abuse.
 - iv. Allegations of abuse or poor practice should be responded to quickly and appropriately.
 - v. Confidentiality should be maintained in accordance with relevant legislation.
 - vi. Anyone who is unsuitable to work with children and/or vulnerable adults should be identified by whatever legal means is available to the Students' Union and prevented from doing so.
 - vii. It is necessary to work with other agencies providing services for vulnerable groups to combat and prevent abuse occurring.
- 1.3 This policy addresses the Union's approach to safeguarding in respect of all students, staff and visitors and should be read in conjunction with the Union's Whistleblowing Policy.

2. Safeguarding Principles

- 2.1 Our approach to safeguarding is guided by two key principles:
- i. The Students' Union must endeavour to ensure that all members have access to as many of the Students' Union services as possible - putting in place the appropriate policies and procedures to mitigate any risk.
 - ii. This must take into account all the relevant legal requirements, as well as sit within the broader approach taken by Royal Holloway University.

3. Responsibility

- 3.1 Oversight and accountability for this policy rest with the Board of Trustees who actively promote a culture in which everyone feels safe and respected and who monitor safeguarding risks.
- 3.2 Delegated responsibility for ensuring this policy is adhered to rests with the Students' Union's Senior Management Team, with delegated tasks to Line Managers for specific activities within teams.
- 3.3 The Chief Executive shall take specific responsibility regarding the investigation and reporting of suspicions/allegations of abuse of vulnerable persons to the relevant authorities.

4. Central Union Activities

- 4.1 The Students' Union does not currently undertake any central activities formally defined as 'regulated activities' with vulnerable persons. If this changes, this policy shall be subject to immediate comprehensive revision and review.
 - i. 'Regulated activities' can be defined as the activities that the Disclosure and Barring Service can bar people from doing. It refers to certain roles that involve working with children or vulnerable adults such as teaching and providing care.
- 4.2 Two activities within the Students' Union have been identified as higher risk for vulnerable persons, and therefore specific procedures have been developed in order to manage this effectively.

Venues & Late Night Entertainment

- 4.3 Information on new members, including date of birth, is provided by the College to the Students' Union under our data sharing agreement. This allows all students under the age of 18 to be identified at the start of each academic year.
- 4.4 All students under the age of 18 at the point where the new academic term starts will receive a direct communication from the Students' Union, informing them of their right to access all our venues, but setting out the specific terms of their entry.

Specific terms of entry include:

- i. The requirement for them to complete and sign a declaration form detailing the fact they are unable to purchase or consume alcohol in our venues, or enter the venues after having done so elsewhere.
- ii. The requirement for them to make event security staff aware of their under 18 status at the point of entry at late night events. This is automatically flagged by our door entry system, but the act of declaration enforces the standard of behaviour we expect.
- iii. The requirement for them to make staff aware of their arrival at the Packhorse, clearly informing staff of their Under 18 status.
- iv. The requirement for them to wear an alternative wristband, which clearly identifies them as under 18 and prevents bar staff from serving them alcohol.

- 4.5 The Packhorse operates a Challenge 25 policy with all customers under the age of 25 asked to provide proof of age ID either a point of order or service.
- 4.6 Staff employed within licensed venues are briefed on their roles and responsibilities in respect of vulnerable persons, notably Under 18s and vulnerable adults.
- 4.7 Any student found to have breached this process will be automatically banned from entering the venue, and will be processed via our Venues Disciplinary Procedure.

Student Group Activities

- 4.8 Student groups (which include student-led clubs, societies and collectives) run a wide range of activities on both a planned and ad-hoc basis. This means we need to take a bespoke approach to each group.
- 4.9 For the limited number of under 18s, they are automatically prevented from joining any student group via the MSL platform.
- 4.10 If an under 18 year old (or vulnerable person) wishes to join a student group, the staff team will work alongside the relevant committee to establish:
- i. If any regulated activity might be taking place
 - ii. What action the group needs to take to manage this
 - iii. What restrictions might be added to the individual regarding their participation (for example not being able to attend overnight events)
- 4.11 Once these actions have been agreed in writing, the student is then free to join the group and participate as required.
- 4.12 A number of sports clubs and some societies form a 'contract for services' arrangement with external coaches to help facilitate their activity. This process is overseen by the Union with a requirement for all coaches to provide a valid DBS (Disclosure & Barring Service) check in advance of being issued a contract.
- 4.13 Insanity Radio (one of our student-led media groups), are required as a condition of their Community Radio FM License, to actively engage members of the community in their work. Before approving a community member the following safeguarding measures are undertaken:
- i. Associate members must go through the Union's Associate Member joining process.
 - ii. A meeting is arranged with the individual between the Insanity Station Manager and an RHSU staff member to understand their motivation for getting involved.
 - iii. The completion of a valid DBS check.

5. Accusations and Reporting of Abuse

- 5.1 The Union has already established a formal 'Whistleblowing Policy', which should be read in conjunction with this document.

5.2 For students and visitors, any concerns or accusations of abuse should be reported through our online complaints, concerns and issues hub. This process is governed by the Statutory Complaints Procedure – Byelaw K. This will ensure that your report is logged and reviewed by the Union’s Senior Management Team.

5.3 For staff, please refer to the Whistleblowing Policy for guidance on raising an internal concern or accusation.

5.4 When an accusation has been made, the Chief Executive, or delegated member of the senior management team, will initiate an investigation under the jurisdiction of one of the following procedures:

- i. Members’ disciplinary process – Byelaw L
- ii. Staff disciplinary policy

5.5 The Chief Executive will take responsibility for liaising directly with any relevant authorities, and for making statutory reports as required.

6. Monitoring & Reporting

6.1 All safeguarding risks are identified and included in the organisation’s Risk Register, which is reviewed at least annually by the Board of Trustees.

6.2 Trustees will ensure that there are appropriate and regularly reviewed safeguarding policies and procedures in place across the organisation, including the regular review of HR and H&S policies which seek to reduce risk.

6.3 Trustees will receive an update and report at relevant Board meetings if any major safeguarding issues have been identified and investigated.

6.4 The Board will receive an annual safeguarding report at its May Finance, Staffing & Risk sub-committee.