Procedure 7 – Reporting (guidance for staff)

Reports can be received in a variety of ways. This can include formal written reports, informal methods such as, texts or social media, community feedback, a verbal report, or rumours or gossip. In line with the responsibilities above, any report heard by team members must be escalated to the appropriate staff member.

Team members, partners or anyone who comes into contact with our programmes, who have a complaint or concern relating to safeguarding should report it immediately. This can be to any of the following people that they feel most comfortable reporting it to:

- Line manager
- Local Designated Safeguarding Officer
- Lead Safeguarding Officer
- Chief or Deputy-Chief Safeguarding Officer

They may also report the issue to another member of staff who may report on their behalf.

1. What to do when receiving a report

1.1 Reports can reach the organisation through various routes. This may be in a structured format such as, a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in their organisation.

1.2 If a safeguarding concern is disclosed directly to a team member, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/check your understanding of the situation
- Report to the appropriate staff member (see below)

1.3 The person receiving the report should document the following information, using an Incident Report Form:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

1.4 The person receiving the report should then forward this information to the relevant Safeguarding Officer (Procedure 1) within 24 hours.

1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited ‘need to know’
basis only. This includes senior management who might otherwise be appraised of a serious incident.

1.6 If the reporting team member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Chief or Deputy-chief Safeguarding Officer, or to an external statutory body. The team member will be protected against any negative repercussions because of this report. See the Information Disclosure (Whistleblowing) Policy.

2. How a report will be assessed and next steps decided

2.1 The Lead Safeguarding Officer, or a more senior safeguarding contact if they are implicated, will appoint a Decision Maker for handling this report.

2.2 The Decision Maker will determine whether it is possible to take this report forward.
   - Does the reported incident(s) represent a breach of safeguarding policy?
   - Is there sufficient information to follow up this report?

2.3 If the reported incident does not represent a breach of KCL Safeguarding Policy or associated protocols but represents a safeguarding risk to others (such as, a child safeguarding incident), the report should be referred through the appropriate channels (e.g. local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example, if the person making the report did not leave contact details), follow the procedures in 2.8 below.

2.5 There may be other KCL policies invoked depending on the type of concern the report relates to. For example, workplace sexual harassment is dealt with through the Dignity at Work Policy.

If there isn’t a policy for the type of report that has been made, follow the case management procedures below.

2.6 If the report raises any concerns relating to children under the age of 18, seek advice from a Lead Safeguarding Officer immediately. If at any point in the process of responding to the report (for example, during an investigation) it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should be immediately informed and should seek expert advice before proceeding.

2.7 Clarify what, how and with whom information will be shared internally relating to this case in line with the confidentiality requirements of the case.

The Chief Safeguarding Officer should be informed of anonymised details of all reports and has responsibility for ensuring Council Members receive appropriate information. The Council Members will have the final decision on what further information they need to receive but should aim for confidentiality wherever possible.

The Chief Safeguarding Officer has responsibility for working with the Council to inform statutory bodies, as described within the protocol, and for advising the programme team on liaising with funding bodies.
2.8 If you have determined at this point to not take the report forward the report should be filed in case it can be of use in the future, and the responsible team look at any wider lesson learning to take forward.

3. What to do in managing a case: investigations and decisions

3.1 The Decision Maker should ensure that relevant expertise and capacity to manage a safeguarding case is in place. **If you do not have this expertise in-house, seek immediate assistance**, through external capacity if necessary.

3.2 If the report alleges a serious safeguarding violation, you may wish to hold a case conference. This should include:

- Decision Maker
- Person who received the report (such as the designated safeguarding officer, or manager)
- HR manager
- Safeguarding adviser (or equivalent) if there is one
- Other staff if necessary

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders.

For reports relating to serious incidents the group should undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required. The risk assessment should be continually updated.

3.3 The Decision Maker decides the next steps. These could be (but are not limited to)

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation’s remit)
- Investigation is required to gather further information (refer to 3.5 onwards)
- Immediate disciplinary action if no further information needed in line with the Capability & Disciplinary Procedure and the Academic Staff Disciplinary Procedure
- Referral to relevant authorities in line with authority risk assessments

If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision-making process will be different, and may include terminating contracts or referring the report onwards.

If the decision results in the conclusion of the case, refer to 4. How to conclude the case.

3.4 Provide appropriate support to survivor(s) of safeguarding incidents. Nb. this could be provided as a duty of care even if the report has not yet been investigated. Support could include (but is not limited to)

- Psychosocial care or counseling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

All decision making on support should be led by the survivor. Survivors should be made aware that support is available but support only provided on request.
3.5 If an investigation is required and internal capacity cannot be found, identify resources to conduct the investigation, including determining which budget this will be covered by. Projects should budget to fund investigations if they are to be required.

Refer to the KCL’s procedures for investigating breaches of policy. If these do not sufficiently cover the required safeguarding investigation, use external guidelines for investigating safeguarding reports, such as the CHS Alliance Guidelines for Investigations.

3.6 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for team member misconduct.

If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities unless this may pose a risk to anyone involved in the case. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

4. How to conclude the case

4.1 Document all decisions made resulting from the case clearly and confidentially.

4.2 Store all information relating to the case confidentially, and in accordance with KCL policy and GDPR.

4.3 Record anonymised data relating to the case to feed into organisational reporting requirements (e.g. serious incident reporting to College Council, safeguarding reporting to donors), and to feed into learning for dealing with future cases.
**Safeguarding Incident Report Form**

| Name of team member recording incident |  |
| Role of team member reporting |  |
| Date of reporting |  |
| Survivor name (if different) |  |
| Survivor e-mail address |  |
| Survivor mobile number |  |
| Alleged perpetrator name |  |
| Has the incident been reported elsewhere yet (internally/externally)? Y/N |  |
| If yes, to whom? |  |
| Date of Incident |  |

**Summary of Incident**

- What did the incident involve? (Include all relevant details along with any background; prompt student for additional information if required) – NB. IF THIS IS A SAFEGUARDING CONCERN THEN YOU MUST NOT ASK THE REPORTEE ANY LEADING QUESTIONS – LET THEM TELL THE ACCOUNT. DO NOT PROMISE CONFIDENTIALITY.
- Where did the incident take place?
- Who else was involved?

Has the survivor done anything about the incident to date?

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**THE REST OF THIS FORM TO BE COMPLETED BY SAFEGUARDING CONTACT**

Who needs to be informed about this event?

- [ ] Designated Safeguarding Officer
- [ ] Lead Safeguarding Officer
- [ ] Chief Safeguarding Officer
- Parent
- Police
- Social Services
- Other (please state)

**Does the survivor need to be referred to further support? Y/N**

**Indicate which support service(s) the survivor should be referred to**

**Who needs to be involved in deciding next steps?**

**Summary of any meetings relating to this incident**

**Does there need to be a formal investigation into the incident?**
- Investigator appointed and budget approved

**Attach any investigation report to this form**
- Final resolution summary

**Date of Resolution (if applicable)**

**Final Sign-off (Name, Position, Date)**