

Professional Development Programmes (CEL) Safeguarding

Policy owner: UCL Centre for Educational Leadership

Lead Provider Safeguarding Lead: Stephen Calladine-Evans

Review cycle: Annual, or sooner where required by changes in legislation, UCL policy or programme arrangements

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Introduction and Scope

“UCL recognises that it has social, moral and legal obligations to safeguard the wellbeing and safety of children and adults at risk involved in any UCL activities, whether they are conducted in person or online.”

“A child is defined as anyone under the age of 18. In this policy we also use the term ‘young person’, ‘young worker’ or ‘young people’ to refer to children aged 16 or 17 years old.”

“An adult at risk is someone aged 18 or over who receives or may need community care services because of a disability, age or illness and as a result of those needs is unable to take care of themselves or is unable to protect themselves against significant harm or exploitation. This can relate to physical, mental or psychological wellbeing or the potential to be drawn into sexual, financial or criminal exploitation and activity.”

“Welfare concerns include but are not limited to risk of suicide, self-harm, untreated mental health needs, going missing, domestic abuse, exploitation, serious self-neglect, risk of homelessness, or sexual abuse.”

The extracts above are drawn from UCL [Safeguarding Children and Adults at Risk Policy and Procedure](#).

This CEL-specific policy recognises that it has social, moral and legal obligations to safeguard the wellbeing and safety of children and adults at risk involved in UCL activities, whether those activities are conducted in person or online.

This policy applies to professional development programmes delivered by the UCL Centre for Educational Leadership, including programmes delivered directly by UCL and those delivered through Partners.

Most participants on CEL professional development programmes are adults working in education and will not ordinarily meet the formal definition of an adult at risk. However, UCL and its Delivery Partners have a duty of care to promote a secure, inclusive and supportive learning environment and to respond appropriately where concerns arise about a participant's safety, welfare or conduct.

This policy therefore applies to:

- safeguarding concerns involving children or adults at risk;
- serious welfare concerns affecting adult participants;
- conduct that may create a risk of harm within a professional learning environment;
- concerns involving participants, facilitators, Delivery Partner representatives or UCL representatives;
- concerns arising during in-person or online programme activity;
- relevant concerns arising outside formal programme activity where there may be an impact on participant safety, professional conduct or the learning environment.

This policy should be understood in the context of relevant UCL safeguarding policies, programme documentation, Delivery Partner safeguarding procedures and the safeguarding procedures of the participant's employer or host venue.

Safeguarding Principles

CEL professional development programmes will be guided by the following principles.

- Protection. Participants should be protected from abuse, harm, exploitation, discrimination, harassment and neglect.
- Safe learning environments. Programme activity should take place in environments in which participants feel safe, respected and able to engage in learning.
- Trust. Participants should have confidence that concerns will be heard, recorded and responded to appropriately.
- Proportionality. Responses should be proportionate to the nature and seriousness of the concern, while ensuring that potential risk is not minimised.
- Timeliness. Concerns should be reported and acted on the working day of disclosure or as soon as practicable.
- Appropriate ownership. Responsibility should remain with the organisation or individual best placed to act. Referring a concern onwards does not remove the responsibility to remain involved until it is clear that appropriate action has been taken.
- Information minimisation. Information should only be shared with those who need it in order to safeguard, support or manage the concern.
- Professional judgement. Safeguarding procedures support, but do not replace, professional judgement. Where there is uncertainty, advice should be sought from the relevant safeguarding lead.
- Independent scrutiny. Where there is uncertainty about whether a concern meets the safeguarding threshold, or whether a case should be closed, a second opinion will be sought from a Programme Director or deputy Director.

CEL and our Delivery Partners have a duty of care towards participants and staff that includes a number of features intended to promote a secure, inclusive, and conducive

learning environment, enabling adult learners to focus on their education without being concerned for their safety or wellbeing. These features include:

1. Protection: It ensures the physical, emotional, and psychological safety of adult learners (Tamers: 2020¹). This encompasses protection from abuse, harm, discrimination, and neglect.
2. Creating a safe environment: Adults learn best in environments where they feel safe and supported. Safeguarding measures foster such an environment, encouraging adult learners to engage more actively in the learning process.
3. Building trust: Safeguarding efforts demonstrate a commitment to the wellbeing of learners, fostering trust between facilitators and learners. This trust is fundamental for effective learning and growth.
4. Legal and Ethical Responsibility: Educational institutions have a legal and ethical responsibility ([KCSIE: 2025](#)) to ensure the safety and wellbeing of their participants and the children or vulnerable adults that they teach. Adhering to safeguarding policies and procedures helps institutions fulfill these obligations.
5. Supporting Vulnerable Learners: Some adult learners might be more vulnerable due to various reasons such as disabilities, mental health issues, or past trauma. Safeguarding measures provide specific support to these individuals, ensuring they have equal access to professional learning and are protected from harm.

¹ Tamers, S.L et al (2020). Envisioning the future of work to safeguard the safety, health, and wellbeing of the workforce: A perspective from the CDC's National Institute for Occupational Safety and Health. American Journal of Industrial Medicine 63/12, pp1065-1084

6. Preventing and Responding to Issues: Safeguarding policies include procedures for preventing potential issues and responding effectively if concerns arise. This might involve ensuring that participants are aware of the expectations of the venue, reporting mechanisms and clear protocols for handling safeguarding incidents.

CEL Professional Development

Programme safeguarding procedures

Within the English system we expect that, as professionals in education, participants and facilitators are DBS checked and receive safeguarding training. The majority of facilitators are practising teachers and therefore also hold DBS certificates and have been trained in safeguarding. Some facilitators are not practising teachers and may not hold current DBS certificates. The delivery partner is then responsible for commissioning a DBS check, ensuring that they receive safeguarding training and work according to the Department for Education statutory guidance [Keeping Children Safe in Education](#).

Non-UK based Delivery Partners, facilitators and participants are all professionals in education. They are expected to adhere to the safeguarding practices of the state and institution within which they are employed. They are also expected to align their practice with the principles established in this policy document, providing feedback through the annual safeguarding audit.

All participants are expected to follow the safeguarding procedures of the host venue of the training event. If the training event is online, facilitators are expected to adhere to the six safeguarding expectations detailed in this document.

Professional development training activities fall within the following category of the UCL safeguarding policy: “Staff, students or volunteers who work with children or adults at risk in another organisation whilst representing UCL should follow the host organisation’s safeguarding policy and procedures.”

In this context we are extending our duty of care to include adults not at risk, and also regarding adults such as facilitators on a UCL provided programme to be representing UCL.

As part of these activities UCL will agree which organisation will take lead safeguarding responsibility. When planning to work with an external organisation UCL representatives ensure that they:

- Have access through the UCL IOE DSL to the name and contact details of the other organisation’s safeguarding lead
- Agree the process for reporting safeguarding concerns
- Agree responsibility for any risk assessments to be carried out
- Agree the responsibility for gaining consent and other permissions relating to confidential data
- Ensuring that staff have the appropriate training, qualifications and DBS clearance to work with children or adults at risk.

Where a UCL employee is accused of abuse the Designated Safeguarding Lead for staff will inform Camden Local Authority Designated Officer who will advise on who else should be informed if the employee also works somewhere else.

Roles and Responsibilities

CEL will:

- appoint a named Lead Provider Safeguarding Lead;

- identify a named deputy or fallback route for periods when the Lead Provider Safeguarding Lead is unavailable;
- maintain a current list of Delivery Partner safeguarding leads;
- provide a clear route for reporting safeguarding concerns;
- provide Delivery Partners with safeguarding procedures and guidance;
- provide induction and periodic safeguarding updates for Delivery Partners;
- ensure that facilitators have access to relevant safeguarding guidance;
- provide role-specific guidance clarifying reporting thresholds and responsibilities;
- provide advice where a Delivery Partner requests support in determining appropriate action;
- collaborate on risk assessment where this is necessary;
- maintain secure records of concerns referred to the Lead Provider Safeguarding Lead;
- monitor patterns and themes across referrals;
- convene safeguarding oversight meetings;
- review this policy in light of experience, oversight findings and changes to UCL policy.

The Lead Provider Safeguarding Lead will:

- receive notifications and referrals from Delivery Partners and UCL colleagues;
- respond on the working day of receipt, or as soon as practicable;
- establish whether immediate action has been taken where there may be urgent risk;
- clarify which organisation is leading the response;
- provide advice without unnecessarily taking ownership from the Delivery Partner, school, employer or Appropriate Body;
- agree an update point with the Delivery Partner safeguarding lead;
- ensure that concerns are tracked from referral to closure or transfer of responsibility;
- seek a second safeguarding-informed view where threshold or closure decisions require additional assurance;
- record any continuing concern where the outcome reached by another organisation does not appear to address the reported risk;

- ensure that personal information is not retained or requested beyond what is necessary;
- report themes and actions to the relevant CEL governance structures.

Delivery Partners will:

- appoint a named safeguarding lead;
- notify CEL promptly of any change to those roles;
- maintain a current list of facilitators and relevant safeguarding checks;
- ensure facilitators receive safeguarding induction and annual updates;
- provide participants with a clear reporting route;
- maintain arrangements for urgent escalation;
- respond promptly to referrals from facilitators or participants;
- identify whether the concern should be led by the Delivery Partner, school, employer, Appropriate Body, UCL or another agency;
- notify the Lead Provider Safeguarding Lead of relevant safeguarding concerns;
- remain involved until appropriate action has been confirmed;
- formulate or contribute to a risk assessment where needed;
- record and retain information securely;
- confirm annually that safeguarding arrangements have been reviewed;
- report, through agreed assurance processes, whether relevant concerns have been managed locally or referred onwards.

Facilitators will:

- understand the Delivery Partner's safeguarding reporting route;
- know the name and contact details of the Delivery Partner safeguarding lead;
- respond calmly and professionally to disclosures;
- not promise confidentiality;
- listen without interrogating, leading or judging;
- make a factual record as soon as possible;
- refer the concern promptly to the Delivery Partner safeguarding lead;

- take immediate action through the venue, school or emergency route where delay would create additional risk;
- not retain copies of referral records once they have been passed securely to the safeguarding lead;
- report inappropriate, harassing, threatening or sexualised conduct involving participants.

Schools and employing institutions are expected to:

- maintain a safeguarding policy;
- provide the Delivery Partner with the name of the relevant safeguarding lead;
- respond to concerns relating to their staff, pupils or setting;
- fulfil their duty of care as employer;
- undertake safeguarding checks and maintain required records;
- liaise with the Delivery Partner and Appropriate Body where relevant;
- confirm when a concern has been addressed or transferred to an appropriate process.

Appropriate Bodies

Where a concern relates to an ECT's induction, professional conduct, support plan, school placement or assessment against the Teachers' Standards, the Appropriate Body may have a relevant role.

Safeguarding concerns should not be treated solely as induction matters. Equally, induction concerns should not automatically be escalated as safeguarding concerns where the school and Appropriate Body are better placed to act.

Safeguarding provision and training

CEL will provide:

- safeguarding induction for new Delivery Partners;

- an annual safeguarding refresher for Delivery Partner safeguarding leads;
- anonymised case examples to support professional judgement;
- information about reporting thresholds and escalation routes;
- confirmation of fallback arrangements when the Lead Provider Safeguarding Lead is unavailable.

Delivery Partners will ensure that facilitators:

- understand the distinction between safeguarding, welfare, employment, complaints, induction and programme concerns;
- understand when concerns must be reported to the school or employer immediately;
- understand when parallel reporting may be necessary;
- know how to respond to a disclosure;
- understand expectations regarding participant-to-participant conduct.

International Delivery Partners will ensure that facilitators and participants understand the meaning and scope of safeguarding within CEL programmes, recognising that national and cultural understandings may differ.

Recognising and categorising concerns

A concern may fall into more than one category. The initial task is not to make a definitive diagnosis, but to identify the safest and most appropriate route.

Safeguarding or serious welfare concerns

These may include:

- possible suicide or self-harm risk;
- domestic abuse;
- sexual abuse or exploitation;
- serious mental health crisis;
- homelessness or serious self-neglect;

- threats, coercion or harassment;
- concerns involving a child or adult at risk.

School or employment concerns

These may include:

- workload;
- grievance;
- workplace relationships;
- sickness absence;
- occupational health matters;
- employment disputes;
- line-management concerns.

Where such concerns create a serious risk to safety or wellbeing, they may also require safeguarding action.

Appropriate Body or induction concerns

These may include:

- support plans;
- concerns about progress;
- assessment against the Teachers' Standards;
- professional conduct;
- suitability for continued induction;
- changes to programme participation as part of an agreed action plan.

Programme concerns

These may include:

- learning access;
- facilitation;
- participant engagement;
- programme workload;
- cluster allocation;

- reasonable adjustments.

Complaints

Dissatisfaction with programme delivery, a facilitator or a Delivery Partner should normally be addressed through the relevant complaints procedure unless the matter also raises a safeguarding, harassment or misconduct concern.

Where there is uncertainty about the appropriate route, advice should be sought rather than delaying action.

Reporting safeguarding concerns.

All concerns must be reported on the working day of disclosure or as soon as practicable.

When a participant makes a disclosure

Action by the facilitator or representative:

- explain that confidentiality cannot be guaranteed;
- listen without interrogating, leading or judging;
- establish only the information necessary to understand whether there may be immediate risk;
- make a factual written record;
- report the concern to the Delivery Partner safeguarding lead;
- take urgent action where required;
- do not investigate the matter;
- do not retain or circulate the referral once it has been submitted securely.

Action by the Delivery Partner safeguarding lead

The Delivery Partner safeguarding lead must:

- review the information promptly;

- determine whether immediate protective action is required;
- identify the organisation best placed to lead;
- contact the school, employer, Appropriate Body or other relevant safeguarding lead;
- notify the Lead Provider Safeguarding Lead where the matter meets the notification threshold;
- agree responsibility, next steps and an update point;
- ensure that the participant receives appropriate signposting or support;
- consider whether a risk assessment is required;
- record the action taken;
- remain involved until responsibility and follow-up are clear.

Notification to the Lead Provider Safeguarding Lead

The Delivery Partner must notify the Lead Provider Safeguarding Lead where:

- there is a serious safeguarding or welfare concern;
- a concern involves possible suicide or self-harm;
- there is alleged harassment, abuse, exploitation or sexualised misconduct involving programme participants;
- a concern involves a facilitator or Delivery Partner representative;
- a concern may affect the safety of the programme learning environment;
- a school or Appropriate Body is taking formal action in relation to conduct that arose through the programme;
- the Delivery Partner is uncertain about threshold, ownership or next steps;
- a concern may create reputational, contractual or systemic risk for the programme;
- a concern relates to the conduct of a Delivery Partner's leadership;
- the matter may not be managed impartially within the Delivery Partner.

Notifying UCL does not transfer ownership automatically. The Delivery Partner, school, employer or Appropriate Body should continue to act unless responsibility has been explicitly transferred.

Urgent and immediate-risk concerns

Where there is reason to believe that a person is at immediate risk of serious harm:

- emergency services should be contacted where necessary;
- the school or employing institution should be informed immediately where it is able to act;
- the participant should not be left unsupported where this can be avoided safely;
- reporting to the Delivery Partner or UCL should take place in parallel and should not delay immediate action;
- the actions taken should be recorded as soon as practicable.

Where a participant expresses possible suicidal intent or self-harm risk, the receiving person should not attempt to provide clinical assessment. The priority is to ensure that the participant is connected promptly with those able to provide immediate support.

Concerns involving participants, facilitators or programme representatives

Concerns about another participant

Where a participant reports inappropriate, threatening, coercive, harassing or sexualised conduct by another participant:

- the affected participant should be heard and supported;
- confidentiality limits should be explained;
- immediate safety within the learning environment should be considered;
- the Delivery Partner safeguarding lead should be informed;
- the alleged conduct should be considered, rather than focusing only on support for the affected participant;
- the Delivery Partner should consider whether the alleged conduct requires

investigation, referral to the participant's employer or Appropriate Body, or changes to programme arrangements;

- any decision to move a participant, alter a cluster or impose other protective measures should prioritise the safety and dignity of the affected participant;
- the Lead Provider Safeguarding Lead should be notified where the conduct is serious, sexualised, repeated or may have implications for professional conduct.

A participant's reluctance to make a formal complaint does not remove the need to consider whether action is required to protect that participant or others.

Concerns about a facilitator or Delivery Partner representative

The Delivery Partner safeguarding lead must:

- make or obtain a factual record;
- take action under the Delivery Partner's safeguarding and employment procedures;
- notify the Lead Provider Safeguarding Lead;
- consider whether the facilitator should be removed temporarily from programme activity;
- consider whether a risk assessment or referral to another body is required;
- retain the relevant records.

Concerns about a Delivery Partner safeguarding lead or senior representative

Where a concern involves the Delivery Partner safeguarding lead or senior leadership:

- the concern should be reported directly to the Lead Provider Safeguarding Lead;
- the Delivery Partner should not be expected to investigate itself without independent oversight;
- UCL will determine the appropriate route for action and escalation.

Concerns about a UCL representative

Where a concern involves a UCL representative:

- the referral should be made to the Lead Provider Safeguarding Lead or the identified

UCL safeguarding route;

- UCL procedures will apply;
- the Delivery Partner safeguarding lead will be notified where appropriate;
- a risk assessment and interim measures will be considered where necessary.

Incomplete, anonymous or unclear reports

CEL will maintain a low-barrier route for reporting concerns. Participants may submit concerns without providing full contact details.

However, reporting forms must make clear that:

- insufficient information may limit the action that can be taken;
- anonymous reports may not be capable of being followed up;
- contact details are strongly encouraged;
- enough factual information should be provided to identify the nature of the concern;
- safeguarding reporting should not be used as a substitute for complaints, employment or Appropriate Body procedures.

The reporting form should:

- prompt the reporter to describe the concern;
- ask whether anyone is in immediate danger;
- invite contact details;
- explain how information will be used;
- identify broad categories of concern;
- signpost alternative routes where appropriate;
- provide additional explanation for international participants.

Where a report is incomplete:

- reasonable attempts should be made to establish contact;
- available information should be reviewed for any indication of immediate or wider risk;
- the relevant Delivery Partner may be contacted where this can be done

proportionately and lawfully;

- the reasons for any decision not to proceed should be recorded;
- a second safeguarding-informed view should be sought where there is uncertainty.

Recording, information sharing and retention

All safeguarding records must be:

- factual;
- dated;
- securely stored;
- accessible only to authorised safeguarding personnel;
- retained only for as long as necessary;
- handled in accordance with UCL data-protection requirements.

CEL will maintain:

- a secure record of referrals received;
- a restricted tracking record showing referral date, organisation, category, action, update points and closure;
- a record of any second-person review;
- an audit trail from receipt to closure or transfer.

Delivery Partners will maintain their own secure records in accordance with their policies. Information should be shared on a need-to-know basis. The Lead Provider Safeguarding Lead should not continue to receive personal or medical updates once the concern is being appropriately managed elsewhere, unless those updates are necessary for programme safety, risk management or a decision about programme provision.

When a case is closed, the record should state:

- who confirmed that appropriate action had been taken;

- which organisation retains ongoing responsibility;
- the basis for closure;
- whether any programme-related action remains;
- whether a second-person review was completed.

Where CEL retains a summary for oversight purposes, it should be anonymised wherever possible.

Assurance, monitoring and oversight

CEL will maintain safeguarding assurance through:

- annual confirmation of Delivery Partner safeguarding leads;
- confirmation that Delivery Partner safeguarding arrangements have been reviewed;
- annual safeguarding refresher activity;
- periodic assurance questions within Delivery Partner reporting;
- reporting of relevant concerns handled locally;
- monitoring of referral patterns;
- termly Safeguarding Oversight Group meetings;
- reporting of themes and actions to the Strategic Partnership Board or other relevant governance body.

Delivery Partner assurance should include confirmation of:

- concerns received during the reporting period;
- concerns handled locally;
- concerns notified to UCL;
- any uncertainty about whether a concern should have been referred;
- changes in safeguarding leadership;
- completion of facilitator safeguarding updates.

The Safeguarding Oversight Group will:

- review anonymised referrals;

- consider alignment between policy and practice;
- identify emerging patterns;
- review threshold and closure decisions;
- recommend changes to policy, guidance or training;
- monitor completion of agreed actions.

Oversight should focus on organisational learning and assurance, not the reinvestigation of individual cases.

Prevent

UCL recognises its responsibilities under the Prevent duty and approaches Prevent primarily as a safeguarding responsibility, balanced with its commitment to freedom of speech and other relevant legal obligations.

Delivery Partners must inform the Lead Provider Safeguarding Lead where they:

- raise a Prevent-related concern with a participant's school or employer;
- act on a Prevent-related concern involving a facilitator or Delivery Partner representative;
- require advice about the appropriate route for a Prevent-related concern.

Prevent-related concerns should be recorded, shared and managed through the same principles of timeliness, proportionality, appropriate ownership and secure information handling set out in this policy.

Associated documents

This policy should be read alongside:

- UCL Safeguarding Children and Adults at Risk Policy and Procedure;
- UCL policies relating to bullying, harassment and sexual misconduct;
- CEL Safeguarding Referral Form;
- CEL Safeguarding Risk Assessment Template;
- CEL Safeguarding Reporting Flowchart;
- Relevant Delivery Partner and school safeguarding policies;
- Relevant complaints, employment and Appropriate Body procedures.

Appendix One

Definitions

Child

A child is anyone under the age of 18. The terms young person, young worker or young people may also be used to describe children aged 16 or 17.

Adult at risk

An adult at risk is a person aged 18 or over who receives or may need community care services because of disability, age or illness and who, because of those needs, may be unable to protect themselves from significant harm or exploitation.

This may relate to physical, mental or psychological wellbeing, or to the potential to be drawn into sexual, financial or criminal exploitation or activity.

Welfare concern

Welfare concerns include, but are not limited to:

- risk of suicide or self-harm;
- untreated or acute mental health needs;
- domestic abuse;
- sexual abuse or exploitation;
- financial or criminal exploitation;
- serious self-neglect;
- risk of homelessness;
- going missing;
- behaviour indicating an immediate risk to the participant or another person.

Safeguarding concern

A safeguarding concern is any information, disclosure, behaviour or pattern that indicates that a child, adult at risk or programme participant may be experiencing, or may be at risk of experiencing, harm, abuse, exploitation or serious welfare difficulty.

Duty-of-care concern

A duty-of-care concern is a matter affecting a participant's safety or wellbeing that requires an appropriate response but may not meet the formal threshold for safeguarding intervention.

Professional conduct concern

A professional conduct concern is behaviour by a participant, facilitator or programme representative that may breach expected professional standards or create an unsafe, intimidating, discriminatory or inappropriate learning environment. This includes inappropriate, harassing, coercive, threatening or sexualised conduct between programme participants, whether it occurs during programme activity or outside it, where the conduct may affect the programme or the safety and wellbeing of participants.

Appendix Two

UCL Safeguarding Procedures

UCL believes that we can demonstrate that our safeguarding procedures are effective, as follows.

- All new UCL staff have to declare any unspent convictions. Any convictions are handled on a case-by-case basis according to our [Criminal Convictions](#) policy.
- We have robust, industry leading Safeguarding policies and practices, (Click to [read UCL's safeguarding policies](#).) They were highly commended by our insurer Axis (2021), who undertook an audit of our safeguarding arrangements. The audit report is available on request.
- We have a designated named Safeguarding Lead, Stephen Calladine-Evans, for the Institute of Education and each Delivery Partner as detailed in our Safeguarding Policy and procedure.
- We have designated Safeguarding Leads for staff as detailed in our Safeguarding Policy and procedure.
- In addition, we have a [network of Safeguarding staff](#) who are trained in this area.
- We have a sector-leading policy on Prevention of Bullying, Harassment and Sexual Misconduct.
- We have the [Report and Support system](#) for staff and participants to disclose any issues.
- We have an Interim Measures Panel to deal with any claims of bullying, harassment or sexual misconduct.
- We have a Third Party Notification Group to inform third parties of any complaints of wrongdoing against staff