



1. STATEMENT OF POLICY

- 1.1 The College aims to take reasonable steps in relation to the safety and welfare of children and adults at risk coming onto its premises and engaging in College-related activities. The College encounters children and some adults at risk in a variety of settings, including through its teaching and research activities, as well as through its recruitment and outreach programmes.
- 1.2 This policy does not discourage such activities in any way. Instead, this policy aims to support them and to offer assurances to those engaged in the work of the College that, through its implementation, the College seeks to protect and reduce harm to children and adults at risk when they are in contact with College members, workers, employees, Fellows, volunteers, apprentices, students or representatives (whether acting in a paid or unpaid capacity). It is also intended to safeguard the interests of College members, workers, employees, Fellows, apprentices, volunteers, students and anyone who works on behalf of the College and who comes into contact with children or adults at risk.
- 1.3 This policy aims to:
- a) promote and prioritise the safety and wellbeing of children and Adults at Risk;
 - b) raise awareness that everyone who comes into contact with children/Adults at Risk has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is centred around the vulnerable individual. This means that they should consider, at all times, what is in the best interests of the child and/or the Adult at Risk;
 - c) provide assurance to parents, carers and other parties that the College takes reasonable steps to manage risks and keep children and Adults at Risk safe;
 - d) ensure that roles and responsibilities are made clear in respect of safeguarding matters and that an appropriate level of information, training and support is provided to those within the College for whom it is necessary;
 - e) provide assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner;
 - f) put in place proportionate safeguards to prevent the employment of individuals to work with children or Adults at Risk where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the College to pose an unacceptable risk;
 - g) ensure that appropriate action is taken in the event of any allegations or

suspicious regarding harm to children or Adults at Risk arising from contact with College members, employees, workers, Fellows, students, apprentices or volunteers, whether the harm has taken place on College premises or not.

- 1.4 This policy requires that any suspicions and allegations involving harm to children and/or Adults at Risk are referred to the Designated Safeguarding Lead to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and sensitively. It will also ensure that appropriate steps are taken as a result of any investigations, which may include contacting the police, a social services and/or fulfilling the duty to refer information to the DBS as required.
- 1.5 The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and Adults at Risk from abuse and the need to protect, Fellows, employees, workers, members, apprentices, volunteers and students from false or unfounded accusations. Any individual who raises a child protection concern will not be subject to any adverse or detrimental treatment.

2. SCOPE

- 2.1 College members, Fellows, employees, workers, members, volunteers, apprentices, students or anyone working on behalf of the College (in a paid or unpaid capacity) are subject to and in scope of this policy.
- 2.2 The policy covers all events and activities organized by those working on behalf of or representing the College, as well as official events and activities organised by its students. Such activities include, but are not limited to, open days, applicant visits and interviews, the interactions between students and members of the Wellbeing team, and visits from members of the public.
- 2.3 It is expected that external bodies utilising the College's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities. In the event that external bodies receive any allegation regarding a College employee, worker, Fellow, member, apprentice, volunteer or student whilst using the College's premises or facilities, the College's Designated Safeguarding Lead must be informed to enable the College to follow this policy and make the appropriate referrals, if required.

3. DEFINITIONS

- 3.1 *Safeguarding*: the full range of steps a higher education provider or other organisation takes to protect individuals, specifically children and Adults at Risk, from abuse and neglect. This includes procedures for preventing abuse and neglect, and actions taken to identify and report any potential incidents of abuse and neglect that have already occurred.
- 3.2 *Safeguarding concern*: arises when there is a child or Adult at Risk, and there is evidence or suspicions of abuse or neglect.
- 3.3 *Child/Children*: For this policy's purposes, a 'child' refers to anyone under the age of 18.
- 3.4 *Adult at Risk*: An individual is an Adult at Risk if they:
- (a) are aged 18 years or over;
 - (b) have needs for care and support of the kind provided by local authorities or other statutory services (whether or not these needs are being met in practice);
 - (c) are unable to protect themselves from abuse or neglect caused by a third-party;
 - (d) are vulnerable to, or already experiencing, abuse or neglect.

You should always report a safeguarding concern if you think that a person might be an Adult at Risk, but you are not sure.

- 3.5 *Abuse*: a form of maltreatment. Someone may abuse or neglect a child or Adult at Risk by inflicting harm or by failing to act to prevent harm.

Abuse can take various forms including:

- (a) physical - may involve hitting, shaking, throwing, poisoning, burning, suffocating or otherwise causing physical harm. May also be caused when an individual fabricates the symptoms or, deliberately induces, illness in a child or Adult at Risk.
- (b) sexual - involves forcing or enticing an individual to take part in sexual activities. May involve physical contact including assault by penetrative or non-penetrative acts. Sexual abuse may also include non-contact activities such as involving children in looking at, or in the production of nude, or semi-nude or sexual images or videos.
- (c) emotional - may include conveying to a child or Adult at Risk that they are worthless, unloved, or inadequate. May include not giving an individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- (d) neglect - the persistent failure to meet a person's basic physical or psychological needs, likely to result in the serious impairment of their health or development. May include failing to provide adequate food,

clothing and shelter, failing to ensure adequate supervision, or failing to ensure access to appropriate medical care or treatment.

3.6 *Regulated activities in relation to children:*

3.6.1 Regulated activities are those activities which people who have been barred by the DBS are prohibited from undertaking.

3.6.2 A regulated activity in relation to children comprises:

- (a) unsupervised activities: teaching, training, instructing, caring for or supervising, or providing advice/guidance on wellbeing, providing personal care, or driving a vehicle only for children;
- (b) working for a limited range of establishments, with opportunity for contact e.g. schools, children's homes, childcare premises;
- (c) Relevant personal care; or
- (d) Registered childminding; and foster-carers.

3.6.3 Work under (a) or (b) is considered regulated activity only if done **regularly**.

3.6.4 The roles of the Director of Admissions, Senior Admissions and Outreach Officer, and Outreach Coordinator and Admissions Officer **are** considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.6.5 The roles of the College's Porters, College's Chaplain, Tutors and the Senior Tutor, Directors of Studies and Supervisors **are not** considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.6.6 Full definitions of regulated activity in relation to children, including definitions of regularity, can be found here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

3.7 *Regulated activity in relation to Adults at Risk:*

3.7.1 Regulated activity in relation to adults identifies activities provided to any adult which, if any adult *requires* them, will mean that the adult will be considered at risk at that particular time. There is no longer a requirement for a person to carry out regulated activities a certain number of times before they are deemed to be engaging in regulated activity in relation to adults. Any time a person engages in one or more of the activities set out below in relation to any adult, they are deemed to be engaging in regulated activity and that adult is deemed to be at risk at that time:

- (a) Providing health care (whether physical or mental, including palliative) provision by any health care professional who is regulated by General Medical Council, General Dental Council, Nursing and Midwifery Council, Health Professions Council;
- (b) Providing psychotherapy and counselling which is related to health care the adult is receiving from, or under the direction or supervision of a health care professional;
- (c) Providing first aid, when any person administering it is doing so on behalf of an organization established for the purpose of providing first aid (e.g. Red Cross);
- (d) Providing personal care as a result of physical or mental illness, including physical assistance with eating or drinking, going to the toilet, washing, bathing, dressing etc., or supervising, training or providing advice/guidance to an adult to undertake these activities themselves where they cannot make the decision to do so unprompted;
- (e) Providing social work;
- (f) Assisting with general household matters (e.g. managing a person's money, paying their bills, shopping on their behalf);
- (g) Assisting in the conduct of a person's affairs (e.g. undertaking lasting or enduring power of attorney for an adult under the Mental Capacity Act 2005, being an independent mental health advocate etc.);
- (h) Conveying (e.g. driving a person specifically for the purpose of conveying them to and from places to receive care as detailed above).

3.7.2 Job roles within the Wellbeing Department (including the Head of Wellbeing, College Nurse, and Student Wellbeing Coach), and the Chaplain **are** considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

3.7.3 The roles of the College's Tutors, the Senior Tutor, Directors of Studies and Supervisors **are not** considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

4. ROLES

4.1 Designated Safeguarding Lead

- 4.11 The Bursar is the College's Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained individuals within College, namely the Safeguarding Leads, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead.
- 4.12 The Designated Safeguarding Lead has responsibility for ensuring that they (or a nominated deputy) are available during normal working hours to respond to allegations without delay, and for procedures to be in place should issue arise outside of normal working hours.
- 4.13 The Designated Safeguarding Lead should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training, their knowledge and skills should be updated at regular intervals, and at least annually, to keep up with any developments relevant to their role.

4.14 The responsibilities of the Designated Safeguarding Lead are as follows:

To raise awareness by:

- a) reviewing on a regular basis the activities of the College involving children or Adults at Risk;
- b) acting as a senior strategic figurehead for Safeguarding issues at the College;
- c) ensuring that the Safeguarding Policy is implemented, and promulgated;
- d) ensuring regular review of the Safeguarding Policy, at least annually, including making recommendations for the amendment of the Policy in line with changes to legislation, when required.

To manage referrals by:

- a) keeping an accurate record of any incidents or matters that raise issues concerning the protection of children or Adults at Risk, in line with the College's policy on data protection and retention;
- b) advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the policy;
- c) liaising with external agencies where appropriate (such as the Police or social services); and
- d) ensuring that those involved in any case are appropriately supported.

To undertake and promote appropriate training by:

- a) engaging in training to ensure that knowledge is kept up to date;
- b) ensuring that appropriate information and training are available to members of the College who in the nature of their role will come into contact with adults at risk and children.

4.15 The Designated Safeguarding Lead will also be responsible for identifying roles within the College for which a DBS check is required.

4.16 The Designated Safeguarding Lead will report annually to the College Council / Governing Body on matters concerning the protection of children and Adults at Risk and on the operation of the College's Safeguarding Policy.

4.2 **Safeguarding Leads**

4.21 Safeguarding Leads take a lead role in College on safeguarding issues relating to students and staff. There are two Safeguarding Leads for students: the Head of Wellbeing and College Nurse, and the Senior Tutor. For staff and Fellows, the Safeguarding Lead is the Head of HR.

4.22 The Safeguarding Leads act as points of contact and advice on safeguarding matters and, upon receiving Safeguarding Concern forms, will determine appropriate remedial action. They will ensure that all Safeguarding Concern forms and safeguarding issues raised to them are passed to the Designated Safeguarding Lead so external agencies can be contacted as appropriate.

4.2 **Head of Departments/Line Managers/College Tutors**

4.21 Each Head of Department/Line Manager is accountable for the adoption and implementation of this policy and for promoting safeguarding within their Department or areas of responsibility. They are responsible for ensuring that appropriate systems are in place for familiarising all staff with this policy, including the Code of Practice, during their induction. They are also responsible for ensuring that relevant staff are familiar with the department's proposed activities and follow the Children and Adult at Risk Safeguarding risk assessment process.

4.22 It is the responsibility of a Head of Department/Line Manager to retain oversight for regulated activities within their area and to ensure:

- a) appropriate training and supervision is available to those employees, workers, Fellows, members, apprentices or students engaging in them;
- b) occasions in which those engaged in them will need to work alone in an unsupervised way are minimised; and

- c) that they are appropriately risk assessed;
- d) that children and adults engaged in regulated activities are given clear information about how, and to whom, they can report any safeguarding concerns.

4.23 In the event of suspicions or allegations being raised in a non-emergency context, the Head of Department/Line Manager or a student's Tutor should be the first point of contact.

4.24 The Head of Department/Line Manager or Tutor must then escalate matters to a Safeguarding Lead by completing a Safeguarding Concern Form.

4.3 **Individual Responsibilities**

4.31 All College employees, workers, Fellows, apprentices, students, members or volunteers working with children and Adults at Risk within the College must be familiar with this policy. In addition, they must, wherever possible, conduct themselves in accordance with the Code of Practice.

4.32 It is the responsibility of the member of staff leading a recruitment campaign, activity or event which involves working with children and Adults at Risk to:

- (a) identify that the children and Adults at Risk safeguarding procedure is applicable to a particular role, activity or event;
- (b) assess potential new recruits using a range of different selection methods, probing the candidates' attitudes, values and motivations in relation to working with vulnerable groups;
- (c) ensure that individuals working with children and Adults at Risk are familiar with the contents of this policy and its applications before any new or changed event/activity, including the Code of Practice;
- (d) complete and update the risk assessment, where appropriate;
- (e) ensure implementation and review of the actions identified by the risk assessment.

4.4 **The HR Team**

4.41 The HR team processes DBS checks for individuals and can advise on levels of checks that are legally permissible and should be undertaken for roles.

5. RISK ASSESSMENT

- 5.1 It is the responsibility of a Head of Department to ensure:
- a) that a risk assessment is undertaken for regulated activities within their area (the assessment should consider how the risks identified can be minimised or eliminated, outline the local processes for reporting concerns, take account of health and safety considerations and record training requirements);
 - b) that completed risk assessments are made available to employees, Fellows, workers, volunteers or students who are involved in the activity; and
 - c) that the implementation and review of actions identified within a risk assessment is undertaken in a timely manner.
- 5.2 The risk assessment process should be initiated by the following circumstances:
- (a) recruitment to a new or existing post which involves working with children and/or Adults at Risk;
 - (b) the commencement of new activities or events involving or potentially involving children and/or Adults at Risk;
 - (c) changes being made to activities or events involving or potentially involving children and/or Adults at Risk.
- 5.3 The purpose of the risk assessment is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children or Adults at Risk. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or Adults at Risk and considering whether the activity could be supervised or observed by others.
- 5.4 Completed risk assessments should be retained whilst an activity/event is ongoing and for five years after it has ceased.
- 5.5 A template risk assessment can be found in Annex C.

6. RECRUITMENT, INDUCTION AND TRAINING

- 6.1 All new employees, workers, Fellows, volunteers, and students working on behalf of the College must be made aware of the existence of this policy and asked to familiarize themselves with the contents as part of their induction.
- 6.2 Any person who will have direct contact with a child or Adult at Risk as part of their day-to-day employment or event/activity is expected to undertake training. Online training is available through Plinth House. This training covers how to recognise the signs of abuse and how to handle safeguarding issues, as per the processes outlined in this Policy.

Links to this training can be found below:

[Picking up on a concern in our day-to-day work](#)

[Safeguarding essentials in higher education](#)

- 6.3 The College permits the recruitment and employment of individuals aged 16 and 17 years old in staff departments. Heads of Department are responsible for completing an individual risk assessment with each employee or worker under the age of 18 upon their appointment. This is to ensure that the young worker is aware of tasks and activities they are not permitted to undertake, and to ensure they understand the rules on working hours for young workers, as set out by the Working Time Directive.

7. DISCLOSURE AND DEBARRING SERVICE (DBS) CHECKS

- 7.1 Employers are only entitled in law to apply for a Barred list check where the activity is regulated, and for a standard or enhanced DBS check where the activity in question falls within one of the other statutory exceptions permitting checks on spent convictions. Basic DBS checks can be requested where the activity would not meet this criteria, but use of such checks must be proportionate to the type and length of activity.
- 7.2 DBS checks will be undertaken when necessary. The service itself decides who is eligible and the government provides a helpful tool to check eligibility for a standard or enhanced check. This tool can be found at: <https://www.gov.uk/find-out-dbs-check>.
- 7.21 Using the eligibility tool, it has been determined that the following College roles require enhanced checks: Director of Admissions, Senior Admissions and Outreach Officer, Outreach Coordinator and Admissions Officer, Chaplain, the Head of Wellbeing, the College Nurse and the Student Wellbeing Coach.
- 7.22 The following require a basic check: College Porters, the Housekeeping Team, the Tutors and the Senior Tutor. No DBS checks have been required from Directors of Studies or Supervisors.
- 7.23 As new roles are established in College, this list will be revised accordingly. DBS checks may be completed with individual at the appropriate level as required even if their role is not specified in the lists above.
- 7.3 The College will undertake additional pre-employment checks where necessary as part of its safeguarding duty, including checking the accreditation of anyone employed by the College as a healthcare or psychotherapy professional such as the Head of Wellbeing and the College Nurse. References from recent previous employers will also be sought.
- 7.4 In liaison with the relevant authorities, the Designated Safeguarding Lead will refer someone to the DBS if they:
- a) Have had their employment with the College terminated because they harmed someone;
 - b) Have had their employment with the College terminated or job role limited because they might have harmed someone; or
 - c) Would have had their employment with the College terminated for either of these reasons, but they resigned first.

It is the College's legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or

Adults at Risk because they caused harm to children/Adults at Risk or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

- 7.5 DBS Checks will be completed with existing employees, volunteers, workers, Fellows, volunteers and students working on behalf of the College, after their employment has commenced, in the following circumstances:
- a) On the implementation of this policy, where their role or responsibilities make them eligible for a check; or
 - b) Should they later take on a role or responsibilities which make them eligible for a check.
- 7.6 All existing employees, volunteers, workers, Fellows, volunteers, and students working on behalf of the College are notified of how the College processes their personal data in relation to these checks via the College's Data Protection Statement – Staff and Senior Members.
- 7.7 DBS Checks will be renewed every 3 years providing an individual remains in a role that requires a check. The government's eligibility tool will be utilised to determine the level of check required; the level of DBS check requested may therefore change at the time of renewal. For those with a standard or enhanced DBS check, who have signed up with the DBS Update Service, their DBS will be rechecked every 3 years via the Update Service to see if there have been any changes, as opposed to being renewed.

8. ARRANGEMENTS FOR SUPPORTING STUDENTS UNDER THE AGE OF 18

- 8.1 The College is not able to take on the authority, rights and responsibilities of parents in relation to their children, and it will not act *in loco parentis* in relation to students who are under the age of 18 years.

However, when admitting a student who will be significantly under the age of 18 when coming in to residence, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:

- a) Tutorial support and teaching – the format of tutorial and teaching support when under-18s are involved will seek, insofar as their educational experience would not be compromised, to avoid singleton tutorials or supervisions. It is recognized, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary.
 - b) IT – Use of the internet by under-18s for study will be as for all students.
 - c) Alcohol and student arranged activities – Access to alcohol by undergraduates under the age of 18 at any activity which is signed off by or known to the College will not be permitted. It is acknowledged that the individual student must also bear responsibility for their actions at any event. Safeguarding issues will be covered at the sign-off stage with student organisers. Consideration should be given to any risk posed by students over 18 at these events.
 - d) The College Bar – the College has effective systems and practices to counter underage drinking and no student under 18 is permitted to work in the College bar.
 - e) Liaison with Faculties and Departments – the College will inform/consult with the relevant Faculty or Department as early as possible about any student who will be under the age of 18 who is being admitted so that the University can put appropriate measures in place to meet its safeguarding obligations.
- 8.2 Residential accommodation offered by the College is generally intended for the use of adults and, except in exceptional circumstances, special arrangements are not made for students who are under the age of 18 years.

9. DEALING WITH SAFEGUARDING CONCERNS

- 9.1 It is not always easy to recognise a situation where abuse may occur or has taken place and College members are not expected to be experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or adult at risk. It is important that the recipient of any complaint or accusation that a child or Adult at Risk has been or is being abused listens carefully without making or implying any judgement as to the truth of the complaint or accusation.
- 9.2 Concerns for the safety and wellbeing of children and Adults at Risk could arise in a variety of ways and in a range of situations. For example, a child or Adult at Risk may report or show signs of abuse, someone may hint that a child or an Adult at Risk is or has been subject to harm, or that a colleague is an abuser, or someone may witness abuse or receive a disclosure. It is impossible to promise complete confidentiality when a concern is raised or an allegation made. This is because the College must take reasonable steps to ensure the safety of children and Adults at Risk on its premises. However, as part of this policy, only people who need to be informed about an incident or concern, whether internal or external to the College, should be informed.
- 9.3 Whilst these concerns may require very different courses of action, it is essential that the safety and welfare of the child or Adult at Risk is prioritised.
- 9.4 Where any individual suspects or is informed that a child or Adult at Risk has been, is being, or could be harmed as a result of taking place in a College activity/event or through contact with College staff, workers, volunteers, apprentices, or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must take the following steps:

In emergency circumstances. Where there is certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed, there are two actions to take. 1. Call 999 immediately so the emergency services can respond. 2. Contact the Porters so they are aware of the incident (01223 334900). It is important to contact the Porters as they may be able to respond quicker to the situation than the emergency services, they may need to provide the emergency services with access to the College site or rooms, and/or they will need to log the incident for College records. Anybody can make a referral in these circumstances.

Once the emergency incident is under control, complete a Safeguarding Concern Report as per the process described in below.

In non-emergency circumstances. Where the situation is not an emergency but there is a safeguarding concern, the following process should be followed:

- (a) Write down details of the incident(s) or concern(s) as soon as possible to ensure that an accurate record is made.
 - (b) Report your concerns to the relevant College Tutor (should the concern relate to a student) or your Head of Department/Line Manager (should the concern relate to a staff member of Fellow).
 - (c) Upon receiving report of a concern, the Head of Department/Line Manager/Tutor will complete a Safeguarding Concern form (available on the College Intranet) and will send the form on to a Safeguarding Lead (Head of Wellbeing and College Nurse, Senior Tutor, or Head of HR). The form asks for factual details of any incidents or concerns, a description of action already taken, and information about the person or people at risk.
 - (d) The Safeguarding Lead will advise on further actions and will send the Safeguarding Concern form to the Designed Safeguarding Lead.
- 9.5 If you require any advice or guidance about this process, please contact a Safeguarding Lead.
- 9.6 (Optional) Where there are concerns about abuse, further advice and guidance can be sought from the NSPCC Helpline on 0808 800 5000 or Childline on 0800 1111. However, this should not take precedence over the processes described above.
- 9.7 When a complaint of abuse is reported, the Designated Safeguarding Lead will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify others with the College or within the University, and take further action through the relevant internal procedures. This may include invoking the

College's disciplinary procedures, or in the case of students, the student disciplinary procedures.

- 9.8 The College is not expected and should not attempt to investigate suspicions of abuse independently.

Where a suspicion needs to be investigated by the relevant authority, it may be necessary for the College to do one or more of the following:

- a) move the victim of an alleged safeguarding breach to a safe place;
 - b) suspend the individual(s) about whom an allegation or suspicion has arisen;
 - c) prevent the individual(s) about whom an allegation or suspicion has arisen from engaging in any regulated activities.
- 9.9 Any enquiries made by the media about possible allegations of abuse regarding children or Adults at Risk should be referred to the Head of Communications immediately.

10. RELEVANT COLLEGE POLICIES AND FURTHER INFORMATION

- 10.1 This policy should be read in conjunction with the College's policies listed below:
- a) Administrative IT Policy
 - b) Code of Conduct
 - c) Data Protection Statements
 - d) Dignity at Work Policy (and Protocol)
 - e) Disciplinary Procedures
 - f) Equal Opportunities Statement and Policy
 - g) Health and Safety Policy
 - h) Lone Working Policy
 - i) PREVENT Strategy
 - j) Recruitment and Selection Policy
 - k) Social Media Policy
 - l) Whistleblowing Policy
- 10.2 The College's key policies can be found on the College Intranet, and/or on the College website under 'College Administrative and Policy Documents'.
- 10.3 All information relating to safeguarding should in line with the College's Data Protection Policy and statements and retained in line with the College's retention schedule.

11. RELEVANT LEGISLATION

11.1 This policy is informed by a collection of legislation and statutory guidance, including the statutory guidance 'Working Together to Safeguarding Children 2023'. The full list is as follows:

- a) Health and Safety at Work Act 1974
- b) Rehabilitation of Offenders Act 1974
- c) Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- d) Children Act 1989
- e) The Police Act 1997
- f) Protection of Children Act 1999
- g) Management of Health and Safety at Work Regulations 1999
- h) The Human Rights Act 1998
- i) Sexual Offences Act 2003
- j) The Children Act 2004
- k) Safeguarding Vulnerable Groups Act 2006
- l) Equality Act 2010
- m) The Counter-Terrorism and Security Act 2015
- n) UK General Data Protection Regulation 2018
- o) Data Protection Act 2018

12. SUMMARY OF CHANGES

Date	Summary of Changes	Date of next review
January 2022	New policy.	January 2023
January 2023	<p>Removed reference to a specific academic year in paragraph 8.1, changing 'For the academic year 2021-22, using the eligibility tool' to 'Using the eligibility tool...'</p> <p>Amended reference to College Nurse to College Nurse and Wellbeing Advisor</p> <p>Revised categorisation of Chaplain as a post undertaking regulated activity with adults ('social work') and changing DBS requirement to an enhanced check rather than a basic check</p>	January 2024
March 2025	Updated 'Relevant College Policies' section	March 2026
January 2026	Policy rewritten in line with University's safeguarding policy and to align with Plinth House Safeguarding Training courses	January 2027

Annex A

Code of Practice

This guidance should be read in conjunction with the College's Safeguarding Policy.

When working with children and/or Adults at Risk, College members, workers, employees, Fellows, apprentices, students and volunteers are expected to take account of the guidance below in the way that they conduct themselves:

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities;
- Wherever possible, work in an open environment with children where they can be seen by others;
- Avoid unnecessary physical contact;
- Avoid taking a child or Adult at Risk alone in a car on journeys, however short;
- Avoid taking a child or Adult at Risk to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person);
- In a situation where you are alone with a child or Adult at Risk, make sure that others can clearly observe you;
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour;
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have;
- Avoid showing favouritism towards particular participants;
- Report incidents of alleged abuse in line with the guidance as contained within this policy;
- Report any concerns about poor practice to senior management or to HR;
- Report any accidents;
- Avoid personal relationships with a child or Adult at Risk;
- It is not appropriate for those in scope of this policy to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of "a position of trust";
- Staff, Fellows, apprentices, students and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet;
- Only official College social media accounts should be used for engaging with the wider community on behalf of the College. Inappropriate or abusive comments should be removed swiftly and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with children or Adults

at Risk. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (for example LOL);

- Do not make suggestive or inappropriate remarks to or about a child or Adult at Risk, even in fun, as this could be misinterpreted;
- Participate in training available to you to support you in your work with children and Adults at Risk;
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening;
- Do not take children or Adults at Risk to your home or alternative location which is not related to the specific activity/event;
- Maintain confidentiality about sensitive information where it is appropriate to do so;
- Where it is necessary for Fellows, staff, apprentices, students or volunteers to take photographs or video images of children or Adults at Risk, doing so requires a lawful basis for processing under the UK GDPR. Where the taking of photographs or video images is optional, consent should be obtained. In circumstances where the taking of photographs or video images is necessary, another lawful basis of processing (such as legitimate interest) should be relied upon and the individuals (or parents/carers) must be given the opportunity to object.
- Give due regard to cultural difference;
- Be alert to and tackle inappropriate behaviour in others, including peer-to-peer behaviours. Abusive behaviour such as bullying (including cyber-bullying), ridiculing or aggression should not go unchallenged;
- Do not give your personal contact details (such as personal phone number, home address, email, or other communication routes) to a child or Adult at Risk, or use any unofficial route to communicate with a child or Adult at Risk;

Annex B

Dealing with disclosures of allegations, or suspicions, of inappropriate behaviour

This guidance should be read in conjunction with the College's Safeguarding Policy.

- a) Consider the urgency of the situation: in the event there is a risk of immediate serious harm to a child or Adult at Risk, the emergency services should be contacted via 999. Anybody can make a referral in these circumstances. Once the situation is no longer an emergency, raise the matter with the student's Tutor, your Head of Department or a Safeguarding Lead who will escalate the concern(s) to the Designated Safeguarding Lead.
- b) Remain calm, avoid expressions of anger or upset and ensure that the person knows you are taking them seriously. Reassure them that they are right to have told someone, but do not touch them (for example by putting an arm round them);
- c) Do not try to investigate or act on the matter yourself: doing so may seriously compromise an investigation by the relevant authorities. You need only clarify what is being said to you (in order to establish that there is a suspicion of harm), and then refer the matter to the appropriate individual as set out in the policy;
- d) Be supportive but do not promise confidentiality. A duty of care obligates the College to act on information where a safeguarding issue has been identified and this takes precedence over the need for confidentiality. Explain that, in order that the allegation can be addressed you will have to talk to other people about it. Explain who you will talk to;
- e) Avoid 'leading' questions, or expressing a view about what you have been told;
- f) Use clear language, appropriate to the person you are dealing with;
- g) Do not talk to anyone else about the matter within your Department; if you need to seek support for yourself you should speak to your Head of Department, a Safeguarding Lead or the Designated Safeguarding Lead;
- h) Write down what you have been told as soon as possible. In all events this must be done on the same day but this should not delay prompt action. Write down exactly what was said *in the person's own words* as far as possible, include the time, place, and as much detail as you can remember, but ensure that the note is as factual as possible and avoid assumption, speculation or opinion. Sign and date the note. Bear in mind that the note will be disclosable to both internal and external agencies.

ANNEX C

Risk assessment form					
College Department:					
Head of Department and contact details:					
Safeguarding Officer and contact details:					
Dates risk assessment written and revised:					
Describe/outline the activity that is under assessment:					
Distribute to all staff, students, volunteers involved in running the activity (list names):					
Hazard (Cause and consequences)	Affected Group	Existing Controls (if any in place)	Risk level (see matrix example)	Further Action (if necessary, include names and dates)	
Risk Matrix		Likelihood			
		High	Medium	Low	Negligible
Potential or probable consequences	Severe	High	High	Medium	Effectively Zero
	Moderate	High	Medium	Medium/Low	Effectively Zero
	Insignificant	Medium/Low	Low	Low	Effectively Zero
	Negligible	Effectively Zero	Effectively Zero	Effectively Zero	Effectively Zero