

CORPUS CHRISTI COLLEGE
University of Cambridge

Safeguarding Policy

Purpose	To adopt the highest standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk.		
Responsible Person	Dr Marina Frasca-Spada, Senior Tutor		
Responsible Committee	Executive Body		
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Revision history	A history of revisions to this policy is included at the end of the document.		

1. Relevant College Policies

This policy should be read in conjunction with the College's policies listed below:

- 1.1 [College Online Safety Statement](#)
- 1.2 [Data Protection Policy](#)
- 1.3 [Equal Opportunities Policy](#)
- 1.4 [Harassment and Misconduct Policy](#)
- 1.5 [Policy concerning personal relationships between staff and students](#)
- 1.6 [Health and Safety Policy](#)

2. Safeguarding Defined

- 2.1 Safeguarding and Pastoral care are interconnected terms and it is therefore important for all members of Corpus Christi College to understand these concepts and why it is important.
- 2.2 Safeguarding can take different forms according to its context. It is useful to consider safeguarding with a 'small s' and a 'capital S'. Safeguarding with a 'capital S' is safeguarding that meets the requirements of Section 42 of the Care Act 2014 or Section 47 of the Children's Act 1989 (2004) and would trigger a formal safeguarding enquiry coordinated by the local authority. Safeguarding with a 'small s' is the kind that aims to protect those at risk of harm and ensure their wellbeing. It is no less important, acts as an early intervention to avoid escalation and is likely to be the most common form of safeguarding activity the College encounters. Many people with physical and/or mental health problems who may have care and support needs can be vulnerable and although they may not be experiencing abuse or neglect as defined under legislation, they nonetheless need a coordinated Pastoral care approach.
- 2.3 Safeguarding focuses on preventing harm and protecting vulnerable individuals from abuse, while pastoral care centres around providing holistic support and nurturing to foster the overall well-being and development of individuals within a community or institution and includes the provision the College makes to ensure the physical and emotional welfare of students and employees. Both safeguarding and pastoral care are essential aspects of creating a safe and supportive environment for all members involved.
- 2.4 While the two concepts differ in their primary objectives, they are closely related in practice. Pastoral care plays a significant role in identifying and addressing the well-being of individuals, and it can be instrumental in recognising and responding to safeguarding concerns. Effective pastoral care systems can serve as a crucial component of an organisation's overall safeguarding efforts.

3. Further Definitions

- 3.1 *Safeguarding*: arrangements in place to protect children and adults at risk in vulnerable circumstances from abuse or neglect.
- 3.2 *Child*: anyone under the age of 18.
- 3.3 *Adult at Risk*: the term 'adult at risk' is used in this policy to replace the term 'vulnerable adult'. The definition of regulated activity for adults changed in 2012 and now identifies activities, which, if provided to any person aged 18 or over (an adult) who needs to engage in that activity, will mean that the adult will be considered at risk at that particular time. It is therefore the activity and the need for it, rather than the setting or the adult's particular personal characteristics, which determines whether an adult is at risk at any given time.
- 3.4 *Abuse*: can be physical, sexual, psychological/emotional, financial/material or professional. It can also arise from neglect. Definitions of key types of abuse can be found in Annex F.
- 3.5 *Position of trust*: a legal term that refers to certain roles and settings where an adult has regular and direct contact with children.
- 3.6 *Regulated activities in relation to children*: regulated activities are those activities which people who have been barred by the DBS are prohibited from undertaking. This comprises:
- 3.6.1 Unsupervised activities including teaching, training, instructing, caring for or supervising, or providing advice/guidance on wellbeing, providing personal care, or driving a vehicle only for children;
 - 3.6.2 Working for a limited range of establishments, with opportunity for contact e.g. schools, children's homes, childcare premises;
 - 3.6.3 Relevant personal care;
 - 3.6.4 Registered childminding;
 - 3.6.5 Foster carers;
 - 3.6.6 Work under (i) and (ii) is considered regulated activity only if done **regularly**.
- The roles of the Admissions Tutor, Admissions Manager, Admissions and Outreach Coordinator and Pelican Programme Leader **are** considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation. The roles of the College's Chaplain, College Porters, Senior Tutor, Directors of Studies, Tutors and Supervisors **are not** considered normally to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation. Full definitions of regulated activity in relation to children, including definitions of regularity, can be found here: [Department for Education \(publishing.service.gov.uk\)](https://www.gov.uk/government/organisations/department-for-education)
- 3.7 *Regulated activity in relation to adults at risk*: regulated activity in relation to adults is identified as 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:

- 3.7.1 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.
- 3.7.2 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.
- 3.7.3 Providing first aid, when any person administering it is doing so on behalf of an organisation established for the purpose of providing first aid (e.g. Red Cross).
- 3.7.4 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.
- 3.7.5 Providing social work.
- 3.7.6 Assisting with general household matters (e.g. managing a person's money, paying their bills, shopping on their behalf).
- 3.7.7 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.).
- 3.7.8 Conveying (e.g. driving a person specifically for the purpose of conveying them to and from places to receive care as detailed above).

The roles of the College's Nurse, Counsellor and/or Mental Health Adviser (where employed by the College), Senior Tutor, Tutors and College Chaplain are considered to involve engaging in regulated activity with adults as defined by the relevant legislation. The roles of Directors of Studies, Supervisors, Porters and Tutorial Office Team are not considered to involve engaging in regulated activity with adults as defined by the relevant legislation. Full definitions of regulated activity in relation to adults can be found here: [ES573375 CCS156 CCS0318265556-1 NHS Eligibility Roles Leaflet Adults v2 EB.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/557337/ES573375_CCS156_CCS0318265556-1_NHS_Eligibility_Roles_Leaflet_Adults_v2_EB.pdf)

4. Aims of the policy

- 4.1 The College aims to adopt the highest standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk. From time to time, the College encounters children and some adults at risk through its teaching and research activities. The majority of engagement with children will be through recruitment and outreach programmes, but occasionally the College may have a full-time student who is under-18 for whom it will provide teaching and welfare/pastoral support.
- 4.2 This policy does not discourage such activities in any way. Instead, it 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 children and adults at risk and keep them

safe from harm when in contact with the College's staff, Fellows, volunteers, students or representatives (whether acting in a paid or unpaid capacity). It is also intended to safeguard the interests of staff, Fellows, volunteers, students, and anyone who works on behalf of the College and who comes into contact with children or adults at risk.

4.3 This policy seeks to:

- 4.3.1 Promote and prioritise the safety and wellbeing of everyone, particularly children and adults who may be at risk.
- 4.3.2 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.
- 4.3.3 Offer assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner.
- 4.3.4 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.
- 4.3.5 Manage effectively the risks associated with activities and events involving children and adults at risk.
- 4.3.6 Raise awareness that everyone who comes into contact with children or adults at risk (and their families) has a role to play.

5. Scope

- 5.1 The College's Fellows, staff, workers, volunteers, students, alumni or anyone working on behalf of the College (in a paid or unpaid capacity) are subject to this policy. This includes external speakers at student events.
- 5.2 The policy covers all events and activities organised by those working on behalf of or representing the College, as well as official events and activities organised by its students. Such activities include open days, masterclasses, applicant visits and interviews, the interactions between students and the College nurse or counsellor and visits from members of the public.
- 5.3 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.
- 5.4 When working with young people on roll with schools, the Designated Safeguarding Officer or one of their Deputies will refer any concerns directly to that school's Designated Safeguarding Lead and will inform the Senior Tutor and Admissions Tutor that they have done so.

6. Roles

- 6.1 The Executive Body approves the Policy, which will be implemented by the Senior Tutor as the College's Designated Safeguarding Officer. As such, the Designated Safeguarding Officer will promote the importance of safeguarding within the College. The responsibilities of the Designated Safeguarding Officer are outlined in Annex C. The Deputy Designated Safeguarding Officer is the Undergraduate Admissions Manager.
- 6.2 The day-to-day operational activities relating to safeguarding may be delegated by the Executive Body to one or more members of staff (Deputy Safeguarding Officers) who have undergone relevant training in safeguarding. However, oversight is retained by the Designated Safeguarding Officer who has overall responsibility for implementing the Policy.
- 6.3 In the unlikely event that a complaint or accusation is made about the Designated Safeguarding Officer (or any Deputy), this will be considered independently by the College Bursar.
- 6.4 Each Head of Department is accountable for the adoption and implementation of this Policy and for promoting safeguarding within their Department.
- 6.5 Every member of College must abide by this Policy.
- 6.6 The Executive Body has overall responsibility for this Policy.

7. Planning Activities

- 7.1 No high-risk activities are anticipated.
- 7.2 It is the responsibility of the Head of Department to retain oversight for regulated activities within their area and to ensure:
 - 7.2.1 Any member of staff, Fellow, volunteer or student working on behalf of the College who engages in a regulated activity completes safeguarding training, together with any additional training that may have been identified by any relevant risk assessment processes.
 - 7.2.2 Safeguarding training undertaken by those working on behalf of the College is recorded.
 - 7.2.3 Occasions in which those engaged in them will need to work alone in an unsupervised way are documented and minimised.
 - 7.2.4 That they are appropriately risk assessed.
 - 7.2.5 That children and adults engaged in regulated activities are given clear information about how, and to whom, they can report any safeguarding concerns.

8. Safeguarding Risk Assessment

- 8.1 It is the responsibility of the Head of Department to ensure:
 - 8.1.1 That a safeguarding 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);

- 8.1.2 That completed risk assessments are made available to staff, Fellows, workers, volunteers or students who are involved in the activity;
 - 8.1.3 That the implementation and review of actions identified within a risk assessment is undertaken in a timely manner.
- 8.2 A template risk assessment form can be found in Annex D.

9. Induction and Training

- 9.1 It is the responsibility of the Head of Department to:
- 9.1.1 Ensure that any member of staff, worker, Fellow, volunteer, student working on behalf of the College within their area is made aware of the existence of this Policy and asked to familiarise themselves with the contents as part of their induction.
 - 9.1.2 Ensure that any member of staff, worker, Fellow, volunteer, student working on behalf of the College within their area who engages in a regulated activity completes safeguarding training, together with any additional training that may have been identified by any relevant risk assessment processes.
 - 9.1.3 Record and monitor the safeguarding training undertaken by those working on behalf of the College in their area.

10. Recruitment and Disclosure and Barring Service (DBS) Checks

- 10.1 A DBS check is required when recruiting to the roles of Admissions Tutor, Director of the Bridging Course, Admissions Office team, Senior Tutor, Welfare Tutors, Tutors, Tutorial Office team, Director of Development (and other Development Team members considered to interact with adults at risk, Communications team, College Nurse, Dean of College, Chaplain, Dean of Chapel, Director of Music, Counsellor, Welfare Officer and Mental Health Adviser (when employed by the College), Harassment Officer, Porters, Housekeeping staff. The government provides a tool that can be used to check the eligibility for a standard or enhanced DBS check: <https://www.gov.uk/find-out-dbs-check>
- 10.2 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 a Counsellor, Mental Health Adviser or Nurse. References from recent previous employers will also be sought.
- 10.3 It is the responsibility of the Head of Department to inform the HR Manager when a DBS check is required for a role which is to be recruited to, so that the correct documentation can be used as part of the recruitment process and discuss with the HR Manager if uncertain whether a check is required to ensure appropriate checks are carried out.
- 10.4 In liaison with the relevant authorities, the Designated Safeguarding Officer will refer someone to the DBS if they:

- 10.4.1 Have had their employment with the College terminated because they harmed someone;
 - 10.4.2 Have had their employment with the College terminated or job role limited because they might have harmed someone;
 - 10.4.3 Would have had their employment with the College terminated for either of these reasons, but they resigned first.
- 10.5 DBS checks will normally be repeated every three years.

11. Arrangements for supporting students under the age of 18

- 11.1 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 into residence, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:
- 11.1.1 Tutorial support and teaching – the format of tutorial and teaching support when students are under the age of 18 years will involve seeking, insofar as their educational experience would not be compromised, to avoid one-to-one tutorials or supervisions. It is recognised, however, that one-to-one contact with Tutors will be necessary, and with Directors of Studies and Supervisors may be. Anyone under 18 will have a Tutor who has been DBS checked.
 - 11.1.2 IT – use of the internet by students under the age of 18 years for study will be as for all students.
 - 11.1.3 Alcohol and student arranged activities – alcohol will not be served to undergraduates under the age of 18 at any activity which is approved by or known to the College. 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 years of age at these events.
 - 11.1.4 The College Bar – the College has effective systems and practices to counter underage drinking.
 - 11.1.5 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 years of age who is being admitted so that the University can put appropriate measures in place to meet its safeguarding obligations.
- 11.2 Residential accommodation offered by the College during term time 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. Residential accommodation for visitors or groups of visitors outside of term time who are under the age of 18 will need to be approved by the Safeguarding Officer and a Risk Assessment needs to be completed by the Fellow or member of staff overseeing the visit.

12. Raising a concern or allegation of abuse

- 12.1 The College expects that in many cases any person involved in the work of the College (Fellows, staff, workers, volunteers, students, other members or anyone working on behalf of the College in a paid or unpaid capacity) will be able to raise any concerns which are not related to safeguarding with their Head of Department (HoD), line manager or responsible person, or tutor in the case of students, in the first instance. Where the individual would prefer not to raise it with that postholder (e.g. in the event the matter involves them), they may instead report the concerns to the Senior Tutor or Bursar.
- 12.2 Given the complexity of safeguarding matters, it is essential that any concerns or allegations of abuse are reported to a Safeguarding Lead to ensure they have access to all the relevant information.
- 12.3 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/ adult at risk may report or show signs of abuse, someone may hint that a child/adult at risk is or has been subject to harm, or that a colleague is an abuser, or someone may witness abuse.
- 12.4 Any person involved in the work of the College (Fellows, staff, workers, volunteers, students, other members or anyone working on behalf of the College in a paid or unpaid capacity) can raise a concern or allegation of abuse by speaking either to the Designated Safeguarding Officer, or to the Deputy Safeguarding Officers, their Head of Department, Tutor, or the Bursar who will escalate matters to the Designated Safeguarding Officer as a matter of course. The Safeguarding Report Form (Annex E) should be completed by the person raising the concern and passed to the Designated Safeguarding Officer.

13. Protection and Support for whistleblowers

- 13.1 The College aims to encourage openness and will support whistleblowers who disclose genuine concerns under this policy, even if they turn out to be mistaken.
- 13.2 Whistleblowers will not be subjected to any detrimental treatment for raising a disclosure – this includes dismissal, disciplinary action, victimisation, harassment or bullying. We take this protection very seriously and any suspected detrimental treatment should be reported immediately to the Master, Senior Tutor or Bursar.
- 13.3 ‘Protect’ offers free expert advice to whistleblowers on how best to raise concerns, what protection the whistleblower is entitled to and what to do if things go wrong. Confidential helpline: 020 3117 2520; Website: <https://protect-advice.org.uk>.
- 13.4 Whistleblowing concerns usually relate to the conduct of our staff or an internal matter, but they may sometimes relate to the actions of a third party. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

14. Procedure for dealing with suspicions or allegations of abuse

This section should be read in conjunction with Annex A

- 14.1 Those working with children and at risk-adults and engaged in regulated activities may:
- 14.1.1 Have alleged abuse disclosed to them;
 - 14.1.2 Suspect abuse is being carried out;
 - 14.1.3 Be accused of abusing those in their charge.
- 14.2 Whilst these issues may require very different courses of action, it is essential that the safety and welfare of the child or adult at risk is prioritised.
- 14.3 If an alleged abuse is disclosed, the member of staff/ Fellow/ volunteer/student to whom the disclosure is made should listen carefully, not ask any leading questions, and should not promise to keep the disclosure a secret. See Section 2.iv of Annex A for full guidance on dealing with disclosures.
- 14.4 Unless there is a risk of immediate harm (see 13.6 below), the Safeguarding Report Form (Annex E) should then be completed and passed to the Designated Safeguarding Officer as soon as possible.
- 14.5 The Designated Safeguarding Officer 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.
- 14.6 **In the event there is a risk of immediate serious harm to a child or adult at risk, the Cambridgeshire and Peterborough Safeguarding Partnership Board or emergency services (999) should be contacted without delay.** Anybody can make a referral in these circumstances. The Designated Safeguarding Officer should then be notified of the case. The Cambridgeshire and Peterborough Safeguarding Partnership Board can be contacted using the following numbers:
- 14.6.1 Cambridgeshire children: 0345 045 5203
 - 14.6.2 Peterborough children: 01733 864180
 - 14.6.3 Out of Hours Emergency Duty Team (EDT): (01733) 234724
- 14.7 Where a child or adult at risk discloses alleged abuse, or a member of the College suspects abuse, which is not deemed to be an emergency, this should be referred immediately to the Designated Safeguarding Officer who will consider what action is required. A referral to the Designated Safeguarding Officer should be made even where concerns are seemingly minor; in some instances, it is a pattern or range of minor incidents which, when taken together, amount to a more significant concern requiring investigation. It is

therefore vital that the Designated Safeguarding Officer is privy to all concerns as they arise.

- 14.8 Appropriate records will be retained by the Designated Safeguarding Officer in accordance with the College's Data Protection Policy. Where the matter relates to both staff and students, the Designated Safeguarding Officer will determine where the file should be kept.
- 14.9 In consultation with the Master, Senior Tutor, Bursar and (as appropriate) the Deputy Safeguarding Officer(s), the Designated Safeguarding Officer will be responsible for contacting any statutory agencies such as the Cambridgeshire and Peterborough Safeguarding Children Partnership Board or the Police, if necessary. The Designated Safeguarding Officer will also have responsibility for fulfilling any legal obligations to report an individual to the DBS.
- 14.10 The Dean of College is not expected and will not attempt to investigate suspicions of abuse independently. In accordance with section 4 of the College Disciplinary Procedures, where an allegation of abuse of an under-18 or at-risk adult is made against a student, the College Disciplinary procedures will not apply.
- 14.11 Where an allegation or suspicion needs to be investigated by the relevant authority, it may be necessary for the College to do one or more of the following:
- 14.11.1 Move the victim of an alleged safeguarding breach to a safe place.
 - 14.11.2 Suspend the individual(s) about whom an allegation or suspicion has arisen.
 - 14.11.3 Prevent the individual(s) about whom an allegation or suspicion has arisen from engaging in any regulated activities.
- 14.12 Serious safeguarding breaches by staff or Fellows may constitute gross misconduct under the College's disciplinary procedures and may lead to summary dismissal; breaches by students may fall under §52 of the College Statutes.

15. Relevant Legislation and Government Guidance

- 15.1 Health and Safety at Work Act 1974
- 15.2 Rehabilitation of Offenders Act 1974
- 15.3 Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- 15.4 The Police Act 1997
- 15.5 Protection of Children Act 1999
- 15.6 Management of Health and Safety at Work Regulations 1999

15.7 The Human Rights Act 1998

15.8 Sexual Offences Act 2003

15.9 The Children Act 2004

15.10 Safeguarding Vulnerable Groups Act 2006

15.11 Equality Act 2010

15.12 Protection of Freedoms Act 2012

15.13 Working Together to Safeguard Children 2023

Annex A: Guidance for those acting on behalf of the College carrying out activities involving children or adults at risk

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

1. General Considerations

- 1.1 If you are acting in a position of trust with children or adults at risk, you are expected to be mindful that you are acting as a role model and therefore should behave accordingly.
- 1.2 Care should be taken to ensure that your conduct is appropriate to each circumstance and environment, and to keep in mind that well-intentioned actions can be misinterpreted.
- 1.3 All regulated activities should have undergone a risk assessment process, and you should have a copy of the relevant risk assessment which will identify the person to whom any concerns should be addressed promptly.
- 1.4 In your role you may become aware of, or suspect another person of, abusing a child or adult at risk or they may disclose an allegation of abuse to you. You should immediately raise any concerns with the Designated Safeguarding Officer.
- 1.5 Allegations of inappropriate behaviour may also be made against you, and such allegations will need to be investigated, and may result in referral to external agencies.

2. Safeguarding of children, young people and adults at risk

2.1 You should:

- 2.1.1 Treat everyone within the College community with respect
- 2.1.2 Provide an example of good conduct which others can follow
- 2.1.3 Ensure you have completed any required training and that you know what you should do if a child or adult at risk makes a disclosure to you
- 2.1.4 Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in
- 2.1.5 Give due regard to cultural difference
- 2.1.6 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
- 2.1.7 If you have to give feedback, take care that it is not unnecessarily negative

2.1.8 Avoid being in a situation where you are alone with a child or adult at risk and make sure that others can clearly observe you

2.1.9 Take care that your language is not open to sexual connotation

2.1.10 Report any suspicions promptly and confidentially to the Designated Safeguarding Officer

2.1.11 Deal with information sensitively and be aware that special caution may be required in moments when discussing sensitive issues with children, young people and adults at risk.

2.2 You should not:

2.2.1 Engage in or allow any form of unnecessary physical contact. This would include doing personal things for a child or an adult at risk that they can do for themselves. Where the person is disabled, tasks should only be carried out with the full consent of the individual (or their parent/guardian/carer)

2.2.2 Use inappropriate language, or allow others to use it without challenging it

2.2.3 Allow yourself to be drawn into inappropriate attention-seeking behaviour

2.2.4 Show favouritism to any individual

2.2.5 Rely on the College's good name to protect you

2.2.6 Engage in any physical sexual relationship with a person to whom you are in a position of trust, even if they give their consent

2.2.7 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

2.2.8 Interact in a personal capacity with children or adults at risk outside of the regulated activity, including through any form of social media, for example, by becoming 'friends' on Facebook

2.2.9 Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on

2.2.10 Allow personal preconceptions about people to prevent appropriate action being taken

2.2.11 Accept gifts which could in anyway be considered a bribe or inducement to enter into a relationship or give rise to an allegation of improper conduct against you

- 2.2.12 Take photographs or make other recordings of children or adults at risk without specific written consent of the individual, or someone with parent/guardian/carer responsibility for that individual

2.3 You should seek advice from the Designated Safeguarding Officer if:

- 2.3.1 You suspect a relationship is developing which may be an abuse of trust
- 2.3.2 You are worried that a child or adult at risk is becoming attracted to you or a colleague
- 2.3.3 You think a child or adult at risk has misinterpreted something you have done or said
- 2.3.4 You have had to physically restrain a child or adult at risk to prevent them from harming themselves, another person or causing significant damage to property
- 2.3.5 A child or adult at risk tells you that they are being abused, or describes experiences that you consider may be abuse
- 2.3.6 You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

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

- 2.4.1 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. The Designated Safeguarding Officer should then be notified of the case and will need to determine whether to refer serious cases to the relevant authorities within one working day.
- 2.4.2 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).
- 2.4.3 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.
- 2.4.4 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.

- 2.4.5 Avoid 'leading' questions, or expressing a view about what you have been told.
- 2.4.6 Use clear language, appropriate to the person you are dealing with.
- 2.4.7 Do not talk to anyone else about the matter within the College, your Department, or your family and friends; if you need to seek support for yourself you should speak to the Designated Safeguarding Officer.
- 2.4.8 Complete the College's Safeguarding Report Form (Annex E) 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. Bear in mind that the note will be disclosable to both internal and external agencies. Make sure you sign and date the form.
- 2.4.9 Maintain confidentiality with colleagues, students, friends, and family.

Annex B: Code of Practice for Student Helpers at Admissions Events

1. Students helpers must:

- 1.1 Treat all visitors and prospective applicants with respect
- 1.2 Provide an example of good conduct
- 1.3 Ensure that one-to-one situations are avoided, e.g., by ensuring that there is always more than one adult present when with one child under 18 years old
- 1.4 Remember that someone else might misinterpret your actions, no matter how well-intentioned
- 1.5 Avoid all physical contact: remember that even caring physical contact with a child under 18 years old may be misinterpreted
- 1.6 Treat everyone equally
- 1.7 Read and agree to the College Safeguarding Policy
- 1.8 Report any safeguarding concerns that arise to the Admissions Tutor or another member of the Admissions Team without delay

2. Student helpers must not:

- 2.1 Share any personal contact details, such as email address or phone number, with children under 18 years old
- 2.2 Connect with prospective applicants or visitors to the College who are under 18 on any social media or online messaging platforms
- 2.3 Be alone with a visitor or prospective applicant who is under 18 years old. This includes both in-person visits and virtual admissions events
- 2.4 Have inappropriate physical or verbal contact with young people
- 2.5 Allow yourself to be drawn into inappropriate attention-seeking behaviour
- 2.6 Make suggestive/ derogatory remarks or gestures in front of children
- 2.7 Jump to conclusions about others without checking facts
- 2.8 Exaggerate or trivialise child abuse issues
- 2.9 Show favouritism to any individual

2.10 Promise to keep a potential safeguarding concern or disclosure confidential; this must be reported.

Name of student helper	
Signature of student helper	
Date	
Name of supervising member of the Admissions Team	
Signature of supervising member of the Admissions Team	

Signed forms for all student helpers at Admissions Events should be kept on record by the Admissions Office

Annex C: Role of the Designated Safeguarding Officer

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

The role of the Designated Safeguarding Officer (supported by Deputies, as appropriate) is as follows:

1. To raise awareness by:
 - 1.1 Reviewing on a regular basis the activities of the College involving children or adults at risk;
 - 1.2 Acting as a senior strategic figurehead for Safeguarding issues at the College;
 - 1.3 Ensuring that the Safeguarding Policy is implemented, and promulgated;
 - 1.4 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.
2. To manage referrals by:
 - 2.1 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;
 - 2.2 Advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the policy;
 - 2.3 Liaising with external agencies where appropriate (such as the Police or the Cambridgeshire and Peterborough Safeguarding Partnership Board);
 - 2.4 Ensuring that those involved in any case are appropriately supported.
3. To undertake and promote appropriate training by:
 - 3.1 Engaging in formal Level 3 (or equivalent) safeguarding training at least every two years to ensure that knowledge is kept up to date;
 - 3.2 Refreshing knowledge and skills at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role;
 - 3.3 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. The Designated Safeguarding Officer will be responsible for identifying roles within the College for which a DBS check is required.

5. The Designated Safeguarding Officer will report annually to the Executive Body / Governing Body on matters concerning the protection of children and adults at risk and on the operation of the College's Safeguarding Policy.

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Annex D: Risk Assessment Form

College Department:			
Head of Department and contact details:			
Designated Safeguarding Officer and contact details:			
Dates risk assessment written and revised:			
Describe/outline the activity that is under assessment <i>Include details of:</i> <ul style="list-style-type: none"> • <i>the nature of the activity or event which involves contact with children and/or adults at risk</i> • <i>the length and frequency of the contact</i> • <i>any occasions where employees/workers/volunteers will not be supervised, observed or accompanied by others</i> Control measures should then be considered in the section below to minimize any safeguarding risks			
Distribute to all staff, students, volunteers involved in running the activity (list names):			
Concern/ hazard (cause and consequences)	Affected Group	Existing Controls (if any in place)	Risk level (see matrix below) and any further action needed (include names and dates)

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Risk Matrix		Likelihood			
		High	Medium	Low	Negligible
Potential or probable consequences	Severe	<i>High</i>	<i>High</i>	<i>Medium</i>	<i>Effectively Zero</i>
	Moderate	<i>High</i>	<i>Medium</i>	<i>Medium/ Low</i>	<i>Effectively Zero</i>
	Insignificant	<i>Medium/Low</i>	<i>Low</i>	<i>Low</i>	<i>Effectively Zero</i>
	Negligible	<i>Effectively Zero</i>	<i>Effectively Zero</i>	<i>Effectively Zero</i>	<i>Effectively Zero</i>

Annex E: Safeguarding Report Template

Your name	
Your position	
Your email address and telephone number	
Name of child/ adult at risk potentially harmed	
Name, address and contact details of child's/ adult at risk's emergency contact	
Date and time of incident	
Date and time incident, allegation or suspicion coming to your attention	
Please provide details of exactly what you have been told and by whom, and/or what you have observed (e.g. who, what happened, when and where). Include details of whether you are reporting your own concerns or passing on those of somebody else. Continue on a separate sheet if necessary.	

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Name, contact details and observations of any witnesses	
Any action taken so far	
<p>Have you spoken with anyone about this incident/suspicion/allegation, other than as already detailed on this form? Include details of conversation with Head of Department or any external agencies if you have had any such conversation.</p> <p>Please remember that information about this matter must be shared on a need-to-know basis only.</p>	<p>Yes No</p> <p>If yes, please complete the following:</p> <p>Name of contact:</p> <p>Position of contact:</p> <p>Organisation of contact:</p> <p>Telephone number of contact:</p> <p>Date and time of conversation:</p> <p>Details of conversation:</p>
Name	
Signature	
Date	

Guidance on completing this form

- Use this form to provide as much detail as is immediately available to you, but do not attempt to obtain additional details from or about anyone else involved in the disclosure.
- Pass this information IMMEDIATELY to the College's Designated Safeguarding Officer who will follow up and take the appropriate action. This should be handed over and acknowledged by the next working day.
- Do not discuss your concerns with anyone other than the College's Designated Safeguarding Officer.
- Do not attempt to investigate the concerns yourself.
- You may need support to cope with the disclosure/concerns you have dealt with – ask the Designated Safeguarding Officer for advice.

Annex F: Categories of Abuse

The table below outlines the four main categories of child abuse as defined by the Government document ‘Working Together to Safeguard Children 2023’

Type of Abuse	Definition
Neglect	<p>The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairments of the child’s health or development.</p> <p>This may involve a parent or carer failing to: provide food, shelter, clothing; protect from physical or emotional harm or danger; ensure adequate supervision (including the use of adequate caregivers); ensure access to medical care or treatment; provide suitable education. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>
Physical Abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p>
Sexual Abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include</p>

	interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
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Revision history

Version	Responsible Person	Summary of changes	Review date	Approved by	Approval date
1.0	Marina Frasca-Spada, Senior Tutor	Initial Policy	25 May 2022	EB	26 May 2022
1.1	Marina Frasca-Spada, Senior Tutor	Reordered content. Addition of section 2; Revised Sections 1, 3, 4, 6, 7, 10, 11, 12, 13, 14, Annex D, Annex F	15 February 2024	EB	29 February 2024
1.2	Marina Frasca-Spada, Senior Tutor	Revised sections 3, 6 and 9	11 April 2024	Head of Governance	16 April 2024
1.3	Marina Frasca-Spada, Senior Tutor	Added 12.1 on raising concerns other than safeguarding concerns and section 13 on 'Protection and Support for Whistleblowers'	5 September 2024	Head of Governance	6 September 2024