HUGHES HALL
UNIVERSITY OF CAMBRIDGE

Safeguarding of Children and Adults at Risk

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Executive Summary:

The College is committed to creating and maintaining the safest possible environment for all.

Under the ownership of the Head of Welfare and Wellbeing as the College's Safeguarding Lead, this policy details the measures that exist to protect the safety and wellbeing of children and adults at risk who engage with members of Hughes Hall through, for example, events, activities and day-to-day interactions. It also serves to safeguard the interests of all College members.

This policy sets out specific safeguarding provisions and guidance relating to:

- Recruitment and Disclosure and Debarring Service Checks.
- The employment of young workers.
- Admissions arrangement and the hosting of under 18s in College.
- Planning activities and risk assessment.
- How to raise a safeguarding concern.

The policy is most relevant to members of the College regularly working with or coming into contact with children and/or adults at risk. However, *any* person involved in the work of the College can raise a concern or allegation of abuse by speaking to their line manager/Tutor or any Senior member of the College, or the Safeguarding Lead. Disclosures will be dealt with under strict need-to-know confidentiality, in line with college data protection policy. This will sometimes involve eternal agencies such as law enforcement where the college has a duty to prevent harm and abuse occurring.

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Approving body: Council	Location: website

1. Policy Purpose

1.1 Hughes Hall carries out a range of activities that bring its staff, Fellows and others working on behalf of the College into contact with children and adults at risk. These activities include its teaching and research activities, as well as activities like recruitment, outreach programmes, internal events, conferences, summer schools, work experience students and bed and breakfast services.

1.2 The College is committed to creating and maintaining the safest possible environment for all. It aims to adopt the highest standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk. This policy does not discourage such activities in any way, but instead 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 employees, Fellows, volunteers, students or representatives (whether acting in a paid or unpaid capacity). It is also intended to safeguard the interests of employees, Fellows, volunteers, students and anyone who works on behalf of the College and who comes into contact with children or adults at risk.

2. Scope

2.1 This Policy seeks to:

a. Promote and prioritise the safety and wellbeing of everyone, particularly children and adults who may be at risk.
b. 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.
c. Offer assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner.
d. 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 a risk.
e. Manage effectively the risks associated with activities and events involving children and adults at risk.

To achieve these aims, the College's Fellows, employees, workers, volunteers, students, or anyone working on behalf of the College (in a paid or unpaid capacity), are subject to this policy.

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 organized by its students. Such activities include but are not limited to open days, applicant visits and interviews, the interactions between students and the college welfare staff and visits from members of the public.

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. The Conference Team will request a copy of these at time of booking, and confirmation of the booking will not take place until these are received. If in any doubt about aspects of other organisations' provision, the Conference Team will consult the Safeguarding Lead.

The College's key policies can be found at: Policies - Hughes Hall (cam.ac.uk). Further guidance on the College's policies can be obtained from the Bursar, Senior Tutor, and Safeguarding Lead.

3. Definitions

Safeguarding	This term describes arrangements in place to protect children and adults at risk in vulnerable circumstances from abuse.
Child / Children	For this policy's purposes, a 'child' refers to anyone under the age of 18 and therefore not legally an independent adult. Particular care should be afforded to a child under the age of 16.
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. These activities are summarized in 3.6.1.
Abuse	Abuse can be physical, sexual, domestic, psychological/emotional, financial/material or professional. It can also arise from neglect and omission, including self-neglect, modern slavery and discrimination. Abuse can be systemic, at the level of organisations and not just individuals.
Regulated activities in relation to children	Regulated activities are those activities which people who have been barred by the DBS are prohibited from undertaking. A regulated activity in relation to children comprises: a. unsupervised activities: teaching, training, instructing, caring for or supervising, or providing advice/guidance on wellbeing, provide personal care, or driving a vehicle only for children; b. working for a limited range of establishments, with opportunity for contact e.g. summer schools, children's homes, childcare premises; c. relevant personal care; or d. registered childminding e. foster-carers. No college roles are considered to involve 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).
Regulated activity in relation to adults at risk	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). The role of the College's Health Practitioner is considered to involve regulated activity with adults at risk, as defined by the relevant legislation. As a precautionary measure and in recognition of the fact that their role could feasibly involve regulated activity (e.g. as on-call senior member of staff during a crisis and deputising for the safeguarding lead on certain matters), the college extends this to the entire core welfare team (namely the Senior Tutor, Deputy Senior Tutor (Teaching & Outreach), Head of Welfare and Wellbeing, and Head of Education Services). Full definitions of regulated activity in relation to adults can be found here: DH Title (publishing.service.gov.uk)

4. Responsibilities

4.1 The Head of Welfare and Wellbeing is the College's designated Safeguarding Lead. As such, they take overall ownership of the policy and will promote the importance of safeguarding within the College. The responsibilities of the Safeguarding Lead are outlined in Annex B.

Given the complexity of safeguarding matters, it is essential that any concerns are reported to the Safeguarding Lead to ensure that one person has access to all the relevant information.

This is particularly important where several seemingly minor issues may collectively give rise to a more substantial concern.

4.2 In the unlikely event that a complaint or accusation is made about the Safeguarding Lead, this will be considered independently by the Senior Tutor.

4.3 Each Head of Department is accountable for the adoption and implementation of this policy and for promoting safeguarding within their Department.

5. Policy Statement

5.1 Special Provisions

5.1.2 Application of these Provisions

The provisions for special recruitment and training procedures and for the conduct of Disclosure and Barring Service checks are applied only at the present time to staff working with children or adults at risk:

- College Porters
- College Health Practitioner
- Senior Tutor
- Deputy Senior Tutor (Teaching & Outreach)
- Head of Education Services
- Head of Welfare and Wellbeing

Council reviews the application of these provisions annually, to take account of any changes to arrangements in College, new risks and new legislation.

5.1.3 Recruitment and Disclosure and Debarring Service (DBS) Checks

The following procedures will be used for all candidates to whom the College offers a position which will bring them into regular unsupervised contact with children or adults at risk:

a. Applicants will be asked to complete an application form.
b. Identity will be carefully checked, and applicants will be required to provide photographic documentation to confirm identity.
c. Applicants will be asked to provide original documentation to provide proof of qualifications.
d. Professional and character references will be sought, preferably including someone who can comment on the applicant's experience of working with children or adults at risk.
e. Previous employment history will be verified through references.
f. Applicants will be required to undergo an appropriate level of Disclosure and Barring Service (DBS) check.
g. All appointed staff will be required to complete an agreed probationary period.
h. All staff will be issued with the College's Policy on the Safeguarding of Children and Adults at Risk.
i. Safeguarding training will be provided to those working with children and/or adults at risk every three years and training records will be kept by the HR Manager.

j. Those individuals who attend training courses arranged by an organisation other than the College are required to advise the HR Manager of their attendance and provide copies of attendance certificates if requested.

Those who are involved in work situations where they have sustained or regular unsupervised access to children or adults at risk are exempt from the Rehabilitation of Offenders Legislation. This means that prospective staff, workers or volunteers must declare all criminal convictions, however long ago, and these will be considered when deciding on their suitability for working with children or adults at risk. No one will be permitted to undertake a role which involves regular contact with children or adults at risk without a satisfactory Disclosure and Barring Service (DBS) check. A list of staff who have received DBS clearance is available from the HR Manager. Copies of DBS clearance documents will be held on individuals' personnel files held by the HR Manager but remain the property of the individual.

However, a criminal record might not prevent a person from working for the College in any other capacity, as per the policy set out in the Staff Handbook. If that person is then asked to undertake tasks which will bring them into unsupervised contact with children or adults at risk, such as work experience placements, any criminal conviction must be declared to the HR Manager who will take appropriate advice where necessary and will decide whether this task should be allocated to another member of staff.

In line with the DBS recommendations, the College will seek disclosures every three years.

It is the responsibility of the Head of Department to:

a. 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.
b. Discuss with the HR Manager if uncertain whether a check is required to ensure appropriate checks are carried out.

In liaison with the relevant authorities, the 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.

5.1.4 Employment of Young Workers

A Young Worker is defined as anyone who is over compulsory school age, but under the age of 18. For example, the College may employ staff between the age of 16 and 18 on a part-time basis in the Catering Department, and through recognised apprenticeship schemes.

Staff under the age of 18 have additional legal protection relating to their hours of work. The Working Time Regulations 1998 will be adhered to in ensuring that young workers have the required rest breaks within a 24hour period. This includes requirements for a rest break of at least 30 minutes if a shift will last longer than four and a half hours, and that the staff member receives at least two consecutive days off per week. Young workers must not work between the hours of midnight and 4am.

A Risk Assessment on each job role where a young worker is appointed will be undertaken and the Line Manager will have responsibility to discuss this with the staff member and implement any recommendations. The staff member must also be provided with information on health and safety precautions, any equipment and protective clothing needed, any training needed to do the job safely and information of what to do in the event of a fire, accident, or other emergency. The Line Manager will be responsible for ensuring this is carried out.

Under Licensing Laws, a young worker can serve alcohol to College Guests with meals under the supervision of a Manager.

The College regularly takes on work experience students for periods not exceeding 2 weeks' duration. Risk Assessments are required in advance by the student's school and, following consideration and approval, the school provides approval for the work experience placement. A representative of the school will be invited to College to review progress during the placement.

DBS checks are not usually required when employing young workers, unless there is a residential or travel element to the role. The HR Manager will individually assess the situation each time a young worker is appointed and decide whether any DBS checks are required.

All young workers will be directed to the College Policies on Equality, Diversity, and Inclusion, and on Respect and Dignity at Work, and please also refer to Staff Handbook. It will be the Line Manager's responsibility to ensure that the young worker has understood these policies.

5.1.5 Arrangements for Admission, Summer Schools, Guests and Partner Organisations

From time to time, the College may host someone under the age of 18, including as part of residential and non-residential summer schools, during an admission process, or as guests in the College's facilities. Residential accommodation offered by the College is generally intended for the use of adults, except with regards to Summer Schools, or where the person under 18 is accompanied by a parent or guardian, or in exceptional circumstances.

For summer school bookings where groups of children and/or adults at risk stay in College, Risk Assessments are to be carried out directly by the organisation making the booking and provided to the College as part of the booking process.

An explicit summary of the safeguarding measures taken by any partner organisations using the Hughes Hall site, resources or branding (such as summer school providers) should be provided to the Safeguarding Lead in advance.

In the case of individual bed and breakfast bookings, parents or guardians are expected to take responsibility for the health and safety of any children and/or adults at risk who are staying with them in College. The accommodation booking platform specifically asks for the age of each guest and will not allow a child to stay in a room without an adult also being present. Self-identifying adults at risk staying in College are asked to complete a Personal Emergency Evacuation Plan on arrival at the Porters' Lodge to ensure their safety during their stay.

The College has a procedure in place for instances where the College itself will host a student under the age of 18, which involves:

a. Designating a legal guardian in the UK if the student is from outside of the UK.
b. Communication with other departments, particularly the Catering Department, Bar Staff in respect of serving alcohol.

c. Communication with the other Teams involved, including Housekeeping, Tutorial (Accommodation Manager), Porters.
d. Consultation with the HR Manager on which DBS checks are in place and whether any further checks are necessary.
e. Ensuring the student's personal details are kept up to date, with emergency contact details.
f. Liaison with relevant other bodies including the University to ensure appropriate arrangements, training and DBS checks are in place to support the safeguarding of the student.

The Head of Welfare and Wellbeing will be responsible for communicating this Policy to those who will be in contact with the student under the age of 18, and for ensuring that one-to-one contact with the student does not happen without the necessary DBS check being in place.

Use of IT and the internet by under-18s for study will be as for all students.

The College has effective systems and practices to counter underage drinking. No student under 18 is permitted to work in the College bar. Access to alcohol by students 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.

For any new incoming student that is to be matriculated and likely to be an adult at risk at any point in their studies (as defined above), a detailed Risk Assessment, and, where relevant, a Personal Evacuation Plan, must be completed by the Head of Welfare and Wellbeing in advance of the student arriving at College. A generic Risk Assessment template is available in Annex C and should be adapted to the individual student's circumstances. This Risk Assessment and any recommended actions should be approved by the Senior Tutor in advance of the student arriving at the College. The Head of Welfare and Wellbeing must then discuss this Risk Assessment and, where relevant, a Personal Evacuation Plan, with the student concerned and provide them with a copy. Similarly, where a current/continuing student is likely to become an adult at risk, the above steps should also apply.

In accordance with Office for Students 'E6' condition guidance, the college provides in-person and online training and signposts new students to access a university-run Single Comprehensive Source of Information for prevention and instances of abuse in the specific areas of harassment and sexual misconduct. The college has a detailed policy on this which should be read in conjunction with the Safeguarding Policy.

5.1.6 The Attendance of Children and/or Adults at Risk at College Events

The College has a statutory duty to ensure the health and safety of people attending an event held in College. The College Conference Office is responsible for assessing whether the nature of any event held in College may represent a risk to health and safety. Consideration will be given to the safety and security of children or adults at risk attending any events.

In the case of events which are primarily attended by adult guests, the health and safety of any children and/or adults at risk attending lies directly with the organiser of the event, or the parents/guardians of the children/adults at risk. This is stated in the booking terms and conditions. Event organisers can request standard Risk Assessments for each conference room directly from the College Conference Office.

In the case of events which are primarily attended by children and/or adults at risk, relevant Risk Assessments are carried out prior to approving the event by the event organiser in consultation with the Head Porter. The one exception to this is events booked by a Fellow or staff member to host a children's party in College, when the health and safety responsibilities for the children attending lies directly with the person making the booking.

Risk Assessments of College outreach events are carried out by the Tutorial Department. These are available on request.

5.2 General Guidance

5.2.1 Planning Activities

All activities or assignments involving children or adults at risk should be planned in advance to ensure they take into account the age range and ability of the participants. Staff supervising activities or assignments involving children or adults at risk should be competent and trained to do so. Where appropriate, a risk assessment provided in Annex C will be undertaken and documented.
It is the responsibility of the Head of Department to retain oversight for regulated activities within their area and to ensure that:

a. Appropriate training and supervision will be given to those employees, workers, Fellows, volunteers or students engaging in them;
b. Occasions in which those engaged in them will need to work alone in an unsupervised way are minimised;
c. That they are appropriately risk assessed; and
d. That children and adults engaged in regulated activities are given clear information about how, and to whom, they can report any safeguarding concerns.

5.2.2. Risk Assessment

It is the responsibility of the 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.

A template Risk Assessment can be found in Annex C.

5.2.3 Physical Contact

Applying cautious common sense, a member of staff, worker or volunteer should not have any physical contact with a child or an adult at risk unless it is to prevent an accident or injury to themselves or anyone else (e.g. to prevent a fall or similar) or in the case of medical assistance being needed (e.g. to administer first aid or similar), in which case the prior consent of the affected person should be sought where possible. Where appropriate, consent from parents or those with parental or caring responsibility should be obtained. Any necessary physical contact

with a child or an adult at risk should always be within the guidelines of being open to scrutiny, minimal, with the person's permission (where practicable) and to their benefit alone.

If a child or an adult at risk is hurt or distressed, the staff member, worker or volunteer should do their best to comfort or reassure the affected person without compromising their dignity or doing anything to discredit the person's own behaviour.

5.2.4 Raising a Concern or Allegation of Abuse

Any person involved in the work of the College (Fellows, employees, workers, volunteers, students, or anyone working on behalf of the College in a paid or unpaid capacity) can raise a concern or allegation of abuse by speaking to their line manager/Tutor or any senior member of the College who will escalate matters to the Safeguarding Lead as a matter of course. Concerns or allegations can also be made directly to the Safeguarding Lead.

If anyone feels unable to convey a concern about a child to a senior member of College staff, then the NSPCC Whistleblowing Helpline can be used for guidance regarding children: the number is 0800 0280285. The Local Area Designated Officer (LADO) can receive referrals for investigation directly from any member of the public via https://www.safeguardingcambspeterborough.org.uk.

It is not the College's responsibility to investigate any suspicions. This requires expertise which the College does not have, and the responsibility is to report it only. Investigations will be carried out by the appropriate authorities with the full cooperation of the College.

Those working with children and engaged in regulated activities may:

a) Have alleged abuse disclosed to them;

b) Suspect abuse is being carried out; or

c) Be accused of abusing those in their charge.

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. During an investigation into allegations of abuse, it may be appropriate to suspend a senior member, employee, worker, volunteer or student or remove them from having any contact with children or adults at risk until an investigation has been carried out.

The College's Designated Safeguarding Lead will appropriately record an allegation or reported incident. On receiving information, a complaint or an allegation, the Designated Safeguarding Lead or other College member must take detailed notes of any complaint or allegation brought to him/her, listening carefully to all that is said, making no promises of absolute confidentiality. Where handwritten notes are typed up later, original contemporaneous notes will be retained.

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.

The Safeguarding Lead will be responsible for contacting any statutory agencies such as the Cambridge and Peterborough Safeguarding Partnership Board or the Police, if necessary. The Safeguarding Lead is to advise the Bursar and Senior Tutor and confer with them on the appropriate steps. The Safeguarding Lead will also have responsibility for fulfilling any legal obligations to report an individual to the DBS.

Appropriate records will be retained by the Safeguarding Lead in accordance with the College's Data Protection Policy. Where the matter relates to both staff and students, the Safeguarding Lead will determine where the file should be kept.

Serious safeguarding breaches may constitute gross misconduct under the College's disciplinary policy and may lead to summary dismissal.

5.2.5 Safety

The safety of people at work and those they are working with is paramount and the College is therefore committed to providing a safe environment within which to work. Those working with children or adults at risk should ensure that all appropriate risk assessments and security checks have been carried out prior to any activity or assignment. This could include first aid cover and accident reporting.

If transporting children or adults at risk, the transport should be checked to ensure it is roadworthy and adequate for the purpose. Any equipment used must be safe and only used for the purpose for which it is intended. Users should be adequately trained. Appropriate insurance should be up-to-date and adequate to cover such assignments and should cover the children/adults at risk. This is the responsibility of the relevant senior manager for the activity in question.

The Safeguarding Lead has responsibility for ensuring that they (or a nominated deputy) are available during normal working hours to respond to queries and allegations without delay, and for procedures to be in place should issue arise outside of normal working hours. Ordinarily, such contact should happen via the welfare team duty phone on 07598 403358.

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 without delay. Anybody can make a referral in these circumstances. The Safeguarding Lead should then be notified of the case.

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 Safeguarding Lead who will consider what action is required. A referral 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 Safeguarding Lead is privy to all concerns as they arise.

5.2.6 Confidentiality

Concerns will always be taken seriously and those expressing concerns will not be subjected to any detrimental treatment. Where the safety of children or adults at risk is in question, only limited assurances of confidentiality can be given as the matter must be addressed at once through the proper channels.

Any member of staff receiving concerns about the safety of children or adults at risk will listen and take notes, making no promises of absolute confidentiality, and refer the matter at once to

the College's Designated Safeguarding Lead. The notes that are taken should be comprehensive and factual and should use full names rather than being anonymised.

All information regarding children/adults at risk is highly confidential and should only be shared with appropriate parties on a need-to-know basis. The sharing of information internally amongst those with safeguarding and pastoral roles may be necessary and will only take place when the sharing of information is in the interests of the child or adult at risk.

All staff are expected to exercise reasonable care and refer to the College policy on Data Protection and the Staff Handbook when dealing with confidential information.

5.2.7 Communications and Contact

Contact should not be made with any child or adult at risk for any other reason unrelated to the particular work. In particular, staff are required to do everything to maintain the College's reputation for integrity and responsibility in dealing with such people and should not enter into any non-work-related arrangements with them, including contact via social media.

5.2.8 Gifts and Inducements

On no account should anyone from the College give a child or an adult at risk a gift, receive a gift, or do anything which could be in any way considered a bribe or inducement to enter a relationship or give rise to any false allegations of improper conduct against the individual.

6. Associated Documents

6.1 Relevant Legislation

The following legislation is relevant to this policy because it has influenced its introduction and/or its content:

a. Health and Safety at Work Act 1974
b. Rehabilitation of Offenders Act 1974
c. Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
d. The Police Act 1997
e. Protection of Children Act 1999
f. Management of Health and Safety at Work Regulations 1999
g. The Human Rights Act 1998
h. Sexual Offences Act 2003
i. The Children Act 2004
j. Safeguarding Vulnerable Groups Act 2006
k. Equality Act 2010
l. Protection of Freedoms Act 2012
m. Working Together to Safeguard Children 2015.

The Protection of Freedoms Act 2012 is of particular importance as all decisions made to bar individuals from working with children or adults at risk are now made by the Disclosure and Barring Service (DBS) under this legislation.

6.2 Other documentation

This policy should be read in conjunction with other existing college policies and procedures, in particular:

- Staff and Student Relationships Policy
- Student and Staff Grievance Procedures
- Harassment Policy and Procedures
- Student Disciplinary Policy
- Whistleblowing Policy
- Prevent Provision
- Staff Handbook, which applies to all staff and office holders and includes policies, procedures and additional detail on Behaviour at Work, Professional Boundaries, Recruitment, Equality, Inclusion and Diversity, Anti-Harassment and Anti-Bullying, Health and Safety and Whistleblowing
- College data protection statements

The College endorses in principle the University's policies and procedures.

6.3 Contact Details

Designated Safeguarding Lead: Head of Student Wellbeing & Welfare PHONE: 07598 403358 (welfare team duty phone).

- *Cambridgeshire Children's Social Care (Children):* 03450 455203.
- Out-of-hours emergency duty team: 01733 234724, referralcentre.children@cambridgeshire.gov.uk.
- *Cambridgeshire Local Authority Designated Officers (LADO) for Safeguarding (Children)* 01223 727967, 01223 727968, 01223 727969. Out-of-hours emergency duty team: 01733 234724, lado@cambridge.gov.uk.
- Cambridgeshire Adult Safeguarding Board (Adults): 03450 455202.
- Out-of-hours emergency duty team: 01733 234724, referral.centre-adults@cambridgeshire.gov.uk.

7. Appendices

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.

A.1 General considerations

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.

Care should be taken to ensure that your conduct is appropriate to each circumstance and environment as well-intentioned actions can be misinterpreted.

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.

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 raise any concerns with your

Head of Department without delay or, where this is not possible, the Safeguarding Lead should be notified directly.

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.

A.2 Safeguarding of children and adults at risk

You should:

a) Treat everyone within the College community with respect.

b) Provide an example of good conduct for others to follow.

c) 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.

d) Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in.

e) Give due regard to cultural difference.

f) 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.

g) If you must give feedback, take care that it is not unnecessarily negative.

h) 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.

i) Take care that your language is not open to sexual connotation.

j) Report any suspicions promptly and confidentially to your Head of Department, or if the suspicions/allegations involve that person or they are unavailable, to the Safeguarding Lead.

k) Deal with information sensitively and be aware that special caution may be required in moments when discussing sensitive issues with children and adults at risk.

You should not:

a) 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/carer).

b) Use inappropriate language, or allow others to use it, without challenging it wherever you feel safe to do so.

c) Allow yourself to be drawn into inappropriate behaviour.

d) Show favouritism to any individual.

e) Rely on the College's good name to protect you.

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

g) Give your personal contact details (such as personal phone number, home address, email or social media) to a child or adult at risk, or use any unofficial route to communicate with a child or adult at risk.

h) 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.

i) Allow allegations of inappropriate behaviour to go unchallenged, unrecorded or un-acted on.

j) Allow personal preconceptions about people to prevent appropriate action being taken.

k) Accept gifts which could in any way be considered a bribe or inducement to enter a relationship or give rise to an allegation of improper conduct against you.

l) Take photographs or make other recordings of at children or adults at risk without specific written consent of the individual, or someone with parental responsibility for that individual.

You should seek advice from your Head of Department if:

a) You suspect a relationship is developing which may be an abuse of trust.

b) You are worried that a child or adult at risk is becoming attracted to you or a colleague.

c) You think a child or adult at risk has misinterpreted something you have done or said.

d) 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.

e) A child or adult at risk tells you that they are being abused or describes experiences that you consider may be abuse.

f) You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

A.3 Dealing with disclosures of allegations, or suspicions, of inappropriate behaviour

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. The relevant Safeguarding Lead 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.

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 or the 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 B - Role of Safeguarding Lead

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

The role of the Safeguarding Lead is as follows:

B.1 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.

B. 2 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 LCSB); and

d) ensuring that those involved in any case are appropriately supported.

B.3 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.

B.4 To identify roles within the College for which a DBS check is required.

B.5 To 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.

Annex C - Risk assessment form

College Dept:	
Head of Dept and contact details:	
Safeguarding Lead and contact details:	
Date of risk assessment written and revised:	
Describe/outline the activity 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** **Moderate** **Insignificant** **Negligible**	High High Medium/low Effectively zero	High Medium Low Effectively zero	Medium Medium/low Low Effectively zero		Effectively zero Effectively zero Effectively zero Effectively zero

8. Implementation and Training

8.1 Implementation, Monitoring and Review

All staff, workers and volunteers at the College will be made aware of this policy and a copy will be available on the College's website and from the HR Manager. Furthermore, a copy of this policy will be given to all relevant bodies with whom the College works and will be made available to parents and carers of children or adults at risk with whom the College plans to work.

Failure to follow the guidelines in this policy is considered a serious offence and will be investigated thoroughly and dealt with through the College's disciplinary procedure. Serious breaches may lead to dismissal.

This policy took effect from 21 June 2022, with review and minor updates added in October 2024 and 2025. The HR Manager has responsibility for implementing and monitoring this policy, which will be reviewed by the Safeguarding Lead annually following its implementation and additionally whenever there are relevant changes to legislation or current working practices.

8.2 Induction and Training

It is the responsibility of the relevant Head of Department to:

a) Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College within their area is made aware of the existence of this policy and is asked to familiarize themselves with the contents as part of their induction.

b) Ensure that any employee, 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.

c) Record and monitor the safeguarding training undertaken by those working on behalf of the College in their area.