



CHURCHILL COLLEGE
CAMBRIDGE CB3 0DS

Safeguarding Policy

Policy Name	Safeguarding Policy
Purpose	<p>The aims of this policy are to</p> <ul style="list-style-type: none">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 an unacceptable risk;e) manage effectively the risks associated with activities and events involving children and adults at risk.
Owner	Senior Tutor as Safeguarding Officer
Contact	Senior Tutor
Approved By	Council
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Churchill College Safeguarding Policy

1. Aims

- 1.1. 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. The College encounters children and some adults at risk through its teaching and research activities, as well as through its recruitment and outreach programmes.
- 1.2. This policy does not discourage the above 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 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.
- 1.3. 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 an unacceptable risk;
 - e) manage effectively the risks associated with activities and events involving children and adults at risk.

2. Scope

- 2.1. 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.
- 2.2. The policy covers all events and activities organized by those working on behalf of or representing the College, as well as official events and activities organized by its students. Such activities include open days, applicant visits and interviews, the interactions between students and the College Nurse/College Counsellor/College Mental Health Adviser and visits from members of the public.
- 2.3. It is expected that external bodies utilising the College's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities.

3. Definitions

3.1. *Safeguarding*: describes arrangements in place to protect children and adults at risk in vulnerable circumstances from abuse or neglect.

3.2. Abuse: The Statutory Guidance to the Care Act 2014 identifies 10 categories of harm:

- i. *Self-neglect*: This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- ii. *Modern Slavery*: This encompasses slavery, human trafficking, forced labour and domestic servitude.
- iii. *Domestic Abuse*: This includes psychological, physical, sexual, financial and emotional abuse perpetrated by anyone within a person's family. It also includes so called 'honour' based violence.
- iv. *Discriminatory Discrimination*: This is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.
- v. *Organisational*: This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- vi. *Physical*: This includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- vii. *Sexual*: This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- viii. *Financial or material*: This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- ix. *Neglect/Acts of omission*: This includes ignoring medical or physical care needs, failing to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- x. *Emotional or psychological*: This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

3.3. *Child/children*: legally, any person up to the age of 18 years (Children Act 1989). Particular care should be afforded to any child under the age of 16.

3.4. *Adults at risk*: An adult at risk is someone who:

- i. has needs for care and support (whether or not the local authority is meeting any of those needs)
and
- ii. is experiencing, or at risk of, abuse or neglect,

and

- iii. as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

3.5. *Regulated activity in relation to children*

3.5.1. *Regulated activity*: includes work (paid or unpaid) which involves certain close contact with children or adults at risk (Safeguarding Vulnerable Groups Act 2006) and which people who have been barred by the Disclosure and Barring Service (DBS) are prohibited from undertaking.

3.5.2. Regulated activity in relation to children includes:

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

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

3.5.4. The roles of the College's Porters, Admissions Tutors and Widening Participation Officer and Undergraduate Tutors with designated responsibility for students under the age of 18, are considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.5.5. The roles of the Senior Tutor, Undergraduate Tutors, Graduate Tutors, Directors of Studies and Supervisors are not considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.5.6. Further information on regulated activity in relation to children may be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf.

3.6. *Regulated activity in relation to adults at risk*

3.6.1. Regulated activity in relation to adults identifies activities provided to any adult which, if any adult requires them, will mean that the adult will be considered at risk for the duration of the particular interaction with the person providing that regulated activity. 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 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 organisation 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 an adult who needs to be conveyed by reason of age, illness and disability).

3.6.2. The roles of the College's Nurse, Wellbeing Co-ordinator and Counsellor (where employed by the College) are considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

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

3.6.4. Further information on regulated activity in relation to adults may be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf

4. Roles

4.1. The Senior Tutor is the College's designated Safeguarding Officer. As such, they take overall ownership of the policy and will promote the importance of safeguarding within the College. The responsibilities of the Safeguarding Officer are outlined in Appendix 2.

4.2. Given the complexity of safeguarding matters, it is essential that any concerns are reported to the Safeguarding Officer to ensure that one person has access to all the relevant information. This is particularly important where a number of seemingly minor issues may collectively give rise to a more substantial concern.

4.3. The HR and Governance Director is responsible for ensuring the provisions of the Safeguarding Policy regarding staff recruitment are adhered to and that appropriate safeguarding training is made available. The HR and Governance Director is also separately

responsible for ensuring that the College is compliant with legislative requirements relating to the employment of Young Workers.

4.4. In the unlikely event that a complaint or accusation is made about the Safeguarding Officer, this will be considered independently by the College's Bursar/Senior Tutor (whichever is not the Safeguarding Officer).

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

5. Recruitment and Disclosure and Debarring Service (DBS) checks

5.1. DBS checks will be undertaken when recruiting where necessary. The service itself decides who is eligible and the government provides a helpful tool to check eligibility for a standard or enhanced check. This tool can be found at: <https://www.gov.uk/find-out-dbs-check>. A list of roles for which DBS checks are considered necessary is shown in Appendix 3.

5.2. 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 or Nurse. References from recent previous employers will also be sought.

5.3. It is the responsibility of the Head of Department to:

- a) Inform the HR/Personnel 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/Personnel Manager if uncertain whether a check is required to ensure appropriate checks are carried out.

5.4. In liaison with the relevant authorities, the Safeguarding Officer 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.

6. Induction and Training

6.1. It is the responsibility of the 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 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.

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:

- a) appropriate training and supervision is available 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; and
- c) that they are appropriately risk assessed

8. Risk Assessment

8.1. 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.

8.2. A template risk assessment can be found in Appendix 4.

9. Arrangements for Supporting students under the age of 18

9.1. The College is not able to take on the authority, rights and responsibilities of parents in relation to their children, and it will not act in loco parentis in relation to students who are under the age of 18 years. However, when admitting a student who will be significantly under the age of 18 when coming in to residence, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:

9.2. Tutorial support and teaching – the format of tutorial and teaching support when under-18s are involved will seek, insofar as their educational experience would not be compromised, to avoid singleton tutorials or supervisions. It is recognized, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary.

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

9.4. Alcohol and student arranged activities – Access to alcohol by undergraduates under the age of 18 at any activity which is signed off by or known to the College will not be permitted. It is acknowledged that the individual student must also bear responsibility for his or her actions at any event. Safeguarding issues will be covered at the sign-off stage with student organisers. Consideration should be given to any risk posed by students over 18 at these events.

9.5. The College Bar – the College has effective systems and practices to counter underage drinking and no student under 18 is permitted to work in the College bar.

9.6. Liaison with Faculties and Departments – the College will inform/consult with the relevant Faculty or Department as early as possible about any student who will be under the age of 18 who is being admitted so that the University can put appropriate measures in place to meet its safeguarding obligations.

9.7. Residential accommodation offered by the College is generally intended for the use of adults and, except in exceptional circumstances, special arrangements are not made for students who are under the age of 18 years.

9.8. it will be necessary to investigate whether the Home Office will issue a visa to an overseas student who is significantly under the age of 18.

10. Arrangements for admissions and outreach and guests

10.1. From time to time the College may host someone under the age of 18, during the additional process or as part of residential and non-residential outreach events, that are run by the College (either solely or in conjunction with a partner organisation).

10.2. For admissions events the Lead Admissions Tutor is responsible for the event and for Outreach events whomever is the Designated Lead for the event is responsible for the event. The Lead Admissions Tutor/Designated Outreach Lead is responsible for

- a) carrying out a risk assessment and ensuring risk reduction measures are implemented;
- b) communicating with other relevant teams (e.g. Housekeeping on any special arrangements needed);
- c) consulting with HR on DBS checks in place for staff involved in the event and whether any further checks are necessary.

11. Expectations of external parties

11.1. 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.

11.2. Before accepting summer schools or similar events, the College will seek evidence that external organisers have addressed their safeguarding responsibilities adequately. This may extend to obtaining copies of their own policies and procedures.

11.3. Use of the internet by under-18s will be as that for over 18s. It is the responsibility of the external body to monitor usage and conduct on the College network.

11.4. The College has systems in place to counter underage drinking and access to alcohol by any person under the age of 18 is not permitted.

12. Raising a concern or allegation of abuse

12.1. 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 Officer as a matter of course. Concerns or allegations can also be made directly to the Safeguarding Officer.

13. Procedure for dealing with suspicions or allegations of abuse

13.1. 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.

13.2. 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.

13.3. The 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.

13.4. 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 Officer should then be notified of the case.

13.5. 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 Officer 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 Officer is privy to all concerns as they arise.

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

13.7. The Safeguarding Officer will be responsible for contacting any statutory agencies such as the Local Safeguarding Children Board (LSCB)¹ or the Police, after consulting with the HR and

Governance Director and/or the Bursar if needed. The Safeguarding Officer will also have responsibility for fulfilling any legal obligations to report an individual to the DBS.

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

13.9. 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.

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

14. Relevant College Policies

- i. Equal Opportunities Policy
- ii. Data Protection Policy
- iii. Recruitment Policy (IN DRAFT)
- iv. Recruitment of Ex-Offenders Policy (IN DRAFT)
- v. Processing of Special Category Data Policy
- vi. Health and Safety Policy
- vii. Appropriate Relationships between Staff and Students (Including Prospective Students) (College Regulation 18 and Staff Regulation 50)
- viii. Use of Computing Facilities, the Internet and Electronic Mail Policy (College Regulation 13 and Staff Regulation 9)
- ix. Lone Working Policy
- x. Public Interest Disclosure Policy (Staff Regulation 49)
- xi. Disciplinary Policy and Procedure (Statute XXXV, Part III and Staff Regulation 14)
- xii. External event risk assessment protocol [UNDER REVIEW]
- xiii. Student Handbooks

15. Relevant legislation

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

- i. Health and Safety at Work Act 1974
- ii. Rehabilitation of Offenders Act 1974
- iii. Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- iv. The Police Act 1997
- v. Protection of Children Act 1999
- vi. Management of Health and Safety at Work Regulations 1999
- vii. The Human Rights Act 1998
- viii. Sexual Offences Act 2003
- ix. The Children Act 2004
- x. Safeguarding Vulnerable Groups Act 2006

- xi. Equality Act 2010
- xii. Protection of Freedoms Act 2012
- xiii. Working Together to Safeguard Children 2015.

15.2 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.

Appendix 1: 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 as 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 raise any concerns with your Head of Department without delay or, where this is not possible, the Safeguarding Officer should be notified directly.
- 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 and adults at risk

2.1 You should:

- a) Treat everyone within the College community with respect;
- b) Provide an example of good conduct you wish 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 have to give feedback, take care that it is not unnecessarily negative;
- h) Avoid being in a situation where you are alone with a child 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 in the event that the suspicions/allegations involve that person or they are unavailable, to the Safeguarding Officer;
- 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.

2.2 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);
- b) Use inappropriate language, or allow others to use it without challenging it;
- c) Allow yourself to be drawn into inappropriate attention-seeking 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, Skype address 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;
- 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, recorded or acted on;
- j) Allow personal preconceptions about people to prevent appropriate action being taken;
- k) 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;
- 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.

2.3 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.

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

3.1. You should

- 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 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;
- 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 Officer;
- 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.

Appendix 2: Role of the Safeguarding Officer

The role of the Safeguarding Officer is as follows:

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.

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.

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.

4. The Safeguarding Officer will be responsible for identifying roles within the College for which a DBS check is required.

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

Appendix 3 – Roles for which a DBS check is considered necessary

Role	Type of check
Nurse	Enhanced
Counsellor (where employed by the College)*	Enhanced
Wellbeing Coordinator	Enhanced
Admissions Tutors	Enhanced
Lead Admissions Tutor	Enhanced
Widening Participation Officer	Enhanced
Undergraduate Tutor with responsibility for students under 18	Enhanced
Porter	Enhanced

* Where the College engages the services of self-employed counsellors they are asked to provide proof of their accredited professional membership certificate (usually BACP or NCPS) and also their indemnity insurance.

Employees for whom a DBS check is undertaken will be asked to join the DBS update service. The College will reimburse the employee for the cost of subscribing to this service. The College will use the service to undertake a repeat check annually.

Risk Assessment Form

Department:		
Activity:		
Assessed by:	Review annually, after an accident or change of procedure.	
	Date:	
HAZARD	RISK LEVEL Hazard x Likelihood = risk. (low, medium, high)	PRECAUTIONS
People at risk:		
SAFETY PLAN SUMMARY		
PPE:		
SAFE WORKING PRACTICES		
Any special training required and how often it needs updating		
To be read in conjunction with:		
All problems/ faults must be reported to:		
Do not use if faulty.		