



DOWNING COLLEGE CAMBRIDGE

Policy on the Safeguarding of Children and Adults at Risk

Policy/guidance owner	Senior Tutor, Head of Student Wellbeing, Head of HR
Approving committee	Education Committee and College HR Committee
Administrator	College Secretary
Scope	All College staff, Fellows, students, volunteers or anyone who works on behalf of the College (in a paid or unpaid capacity).
Last reviewed	29 September 2023 (GB)
Next review date	September 2024
This document may only be modified with the ratification of the approving committees. Please contact the administrator with any queries.	

1. Context

Downing College aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk coming onto its premises and engaging in College-related activities. The College encounters children and adults at risk in a variety of settings including its teaching and research activities, recruitment and outreach programmes, internal events, conference business, summer schools, work experience schemes and bed and breakfast services.

This document states the College's policy on preventing and reducing harm to children and adults at risk when they are in contact with College employees, Fellows, volunteers, students or representatives (whether acting in a paid or unpaid capacity).

The policy should be read in conjunction with the following College documents:

- Code of Practice relating to appropriate relationships between Senior Members and students in the College – College Ordinances
- Respect and Dignity Policy
- Harassment and Sexual Misconduct Policy
- Sexual Assault Policy
- Health and Safety Policy
- Data Protection Policy
- Fitness to Study Policy
- Rules and Guidelines – Discipline
- Rules and Guidelines – Suggestions and Complaints

- Rules and Guidelines – College Network: Rules and Acceptable Use
- General Conditions of Booking (Conferences, Meetings, Functions and Group Bed and Breakfast)
- Staff Handbook
- Student Accommodation Handbook
- Guidance for Downing College Clubs and Societies
- Guidelines on Filming and Photography in Downing College

College documents and policies can be found at <https://www.dow.cam.ac.uk/about/documents-and-policies/downing-college-policies>.

The College endorses in principle the University's policies and procedures. The Office of Student Conduct, Complaints and Appeals (OSCCA) provides a summary of complaints guidance.

2. Aims and scope

The policy aims to:

- a) promote and prioritise the safety and wellbeing of everyone, particularly children and adults who may be at risk;
- b) raise awareness that everyone who comes into contact with children or adults at risk has a role to play;
- c) 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;
- d) offer assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner;
- e) put in place proportionate safeguards to prevent the employment of individuals to work with children or adults at risk where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the College to pose an unacceptable risk to vulnerable groups;
- f) manage effectively the risks associated with activities and events involving children and adults at risk;
- g) ensure that appropriate action is taken in the event of any suspicions or allegations of harm to children or adults at risk arising from contact with College staff, Fellows, students, volunteers or representatives;
- h) safeguard the interests of College staff, Fellows, students, volunteers and anyone who works on behalf of the College and comes into contact with children or adults at risk.

All College staff, Fellows, students, volunteers or anyone who works on behalf of the College (in a paid or unpaid capacity) are subject to and in scope of the policy.

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. This includes any unsupervised one-to-one interactions, such as with a Tutor, Director of Studies or Supervisor; interactions between students and the College wellbeing team; open days; applicant visits and interviews; summer schools; conference business; work experience or shadowing of members of 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 all individuals involved in any related activities. In addition, whilst on our premises, external bodies are expected to have due regard to this policy.

3. Definitions

For the purposes of the policy, the following definitions are used:

Safeguarding: involves taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; protecting people, especially children and adults at risk, from that harm; and responding appropriately when harm occurs. Safeguarding applies consistently across all activities associated with the College. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having accountable and transparent systems for response, reporting and learning when risks materialise.

Types of situations from which children and adults at risk should be safeguarded include but are not limited to:

- financial exploitation
- sexual harassment, abuse or exploitation
- physical, emotional or psychological abuse
- recruitment to radical extremist organisations
- enticement into illegal activities
- domestic violence
- cyber abuse
- modern day slavery
- bullying or harassment
- forced marriage
- female genital mutilation
- discrimination
- data breaches

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.

Adult/s at risk:¹ any person aged over 18 years who, by reason of mental or other disability, age or illness is (or may be) unable to take care of themselves or is (or may be) unable to protect themselves against significant harm or exploitation (Section 59 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012).

This may be someone who

- is elderly and frail due to ill health, physical disability or cognitive impairment;
- has a learning disability;
- has a physical disability and/or a sensory impairment;
- has mental health needs such that their capacity is reduced;
- has a long-term illness/condition;
- misuses substances or alcohol;
- is a carer, such as a family member/friend who provides personal assistance and care to adults, and is subject to abuse;

¹ The term 'adult at risk' is used in this policy to replace the term 'vulnerable adult'.

- is unable to demonstrate the capacity to make a decision and is in need of care and support.

Abuse: can be physical; sexual; psychological; emotional; financial; material; or professional. Abuse can also arise from neglect.

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.

Regulated activity in relation to children includes:

- 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;
- working for a limited range of establishments, with opportunity for contact e.g. schools, children's homes, childcare premises;
- relevant personal care;
- registered childminding and foster caring.

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

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.

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:

- 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);
- 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;
- 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);
- 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;
- Providing social work;
- Assisting with general household matters (e.g. managing a person's money, paying their bills, shopping on their behalf);
- 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.);
- Conveying (e.g. driving a person specifically for the purpose of conveying them to and from places to receive care as detailed above).

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

The roles of College Porter, Admissions Tutor, Access and Widening Participation Officer and Schools Liaison Officer are considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

The roles of College Chaplain, Tutor and Senior Tutor, Director of Studies, Supervisor, College Nurse, Head of Student Wellbeing and Student Wellbeing Advisor are not considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

The roles of College Porter, Tutor and Senior Tutor, Academic Registrar, College Nurse, Head of Student Wellbeing and Student Wellbeing Advisor are considered to involve engaging in regulated activity with adults, as defined by the relevant legislation.

The roles of College Chaplain, Director of Studies and Supervisor are not considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

The Senior Tutor and Head of HR are the College's Safeguarding Leads. As such, they take overall ownership of this policy and will promote the importance of safeguarding within the College. The responsibilities of the Safeguarding Lead are outlined in *Annex B*.

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

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

5. Special provisions

a. Application of special provisions

At the present time, provisions for special recruitment and training procedures and for the conduct of Enhanced DBS checks are applied only to staff working with children or adults at risk:

- Senior Tutor
- College Nurse
- Head of Student Wellbeing
- Student Wellbeing Advisor
- Tutors (including Admissions, Undergraduate and Graduate)
- College Porter
- Schools Liaison Officer
- Access and Widening Participation Officer
- Academic Registrar

College HR Committee will review the application of these provisions annually, to take account of any changes to arrangements in College, new risks or new legislation.

b. Recruitment of staff and 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:

- applicants will be asked to complete an application form;
- identity will be carefully checked and applicants will be required to provide photographic documentation to confirm identity;
- applicants will be asked to provide original documentation to provide proof of qualifications;
- 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;
- previous employment history will be verified through references;
- applicants will be required to undergo an appropriate level of DBS check;
- all appointed staff will be required to complete an agreed probationary period;
- all staff will be issued with the College's Policy on the Safeguarding of Children and Adults at Risk;
- 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 Head of HR;
- those individuals who attend training courses arranged by an organisation other than the College are required to advise the Head of HR 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 DBS check. A list of staff who have received DBS clearance will be available from the Head of HR. Copies of DBS clearance documents will be held on individuals' personnel files held by the Head of HR 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 Head of HR, who will take appropriate advice where necessary and will decide whether this task should be allocated to another member of staff.

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

It will be the responsibility of the Head of Department to:

- a) inform the Head of HR 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 Head of HR if uncertain whether a check is required to ensure appropriate checks are carried out.

In liaison with the relevant authorities, the Safeguarding Leads 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;
- c) would have had their employment with the College terminated for either of these reasons, but they resigned first.

c. 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 ages 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 24-hour 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 for each job role where a young worker is appointed will be undertaken and the Line Manager will be responsible for discussing this with the staff member and implementing 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 on 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 two weeks' duration. Risk assessments are required in advance by the student's school and, following consideration and approval, the school will provide approval for the work experience placement.

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

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

d. Arrangements for supporting students under the age of 18

The College is not able to take on the authority, rights and responsibilities of parents in relation to their children and will not act *in loco parentis* in relation to students under the age of 18. 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 factors, including:

- a) tutorial support and teaching – the format of tutorial and teaching support when under-18s are involved will seek, insofar as their educational experience would not be compromised, to avoid singleton tutorials or supervisions. It is recognised, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary;
- b) IT – use of the internet by under-18s for study will be as for all students;
- c) alcohol and student arranged activities – access to alcohol by undergraduates under the age of 18 at any activity which is signed off by or known to the College will not be

permitted. It is acknowledged that the individual student must also bear responsibility for their actions at any event. Safeguarding issues will be covered at the sign-off stage with student organisers. Consideration should be given to any risk posed by students over 18 at these events;

- d) College bar: the College has systems in place to counter underage drinking and no student under 18 is permitted to work in the College bar;
- e) faculty and department liaison: 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 when admitted, so that the University can put appropriate measures in place to meet its safeguarding obligations.

Residential accommodation offered by the College is generally intended for the use of adults and special arrangements are made for students under the age of 18 only in exceptional circumstances.

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.

e. Arrangements for admission, summer schools and guests

From time to time, the College may host someone under the age of 18, during an admission process, as part of residential and non-residential summer schools, 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.

In the case of individual bed and breakfast bookings, parents or guardians are asked to take responsibility for the health and safety of any children and/or adult at risk who is staying with them in College. No child is permitted to stay in a College room without an adult also being present. Self-identifying adults at risk who are staying in College are asked to complete a Personal Emergency Evacuation Plan at the Porters' Lodge on arrival, 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:

- designating a legal guardian in the UK if the student is from outside the UK;
- communication with other departments, particularly the Catering Department and Bar Staff in respect of serving alcohol;
- communication with other teams involved, including Housekeeping, Tutorial, Accommodation and Porters;
- consultation with the Head of HR on which DBS checks are in place and whether any further checks are necessary;
- ensuring the student's personal details are kept up to date, with emergency contact details;
- liaison with other relevant bodies including the University to ensure appropriate arrangements, training and DBS checks are in place to support the safeguarding of the student.

The Safeguarding Leads 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 all under-18s will be as for all students.

The College has systems in place to counter underage drinking. Access to alcohol by individuals 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 must also bear responsibility for their actions at any event.

For any new incoming student who is to be matriculated and who self-identifies as an adult at risk, a detailed risk assessment and, where relevant, a Personal Emergency Evacuation Plan, must be completed by either the Head of Student Wellbeing or College Nurse in advance of them arriving to College. A safeguarding 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 to College. The Head of Student Wellbeing or College Nurse must then discuss this risk assessment and, where relevant, a Personal Emergency Evacuation Plan, with the student concerned and provide them with a copy.

f. 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. Each relevant department, e.g. the College Conferences and Events 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 attended primarily 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 College's booking terms and conditions. Event organisers can request standard risk assessments for each conference room directly from the College Conferences and Events Office.

In the case of events attended primarily by children and/or adults at risk, relevant risk assessments should be 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 for College outreach events are carried out by the Tutorial Office. These can be made available on request.

g. Expectations of external parties

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.

Before acceptance of 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.

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.

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.

The College does not permit filming or still pictures to be taken without prior authorisation unless they are souvenir and tourist pictures, not for commercial use or reproduction and do not permit the identification of individuals. The College cannot be held responsible for any filming or still pictures that take place on College premises without prior permission.

All visitors to College, regardless of age, are expected to abide by the College rules and guidelines found at: <https://www.dow.cam.ac.uk/current-students/downing-college-rules-and-guidelines>.

6. Guidance for those engaged in activities involving children or adults at risk

a. General guidance

The College has drawn up guidance for College Fellows, staff and students who come into contact with children and adults at risk as part of their work for College and its activities. This guidance may be found at *Annex A*.

The principles in the guidance are intended not only to safeguard children and adults at risk from harm but also to ensure that College Fellows, staff and students are not put in a position where their conduct or integrity can be questioned.

In the case of contractors, failure to follow this guidance may result in the termination of their contract.

b. Induction and training

It is the responsibility of the Head of Department to:

- a) ensure that any employee, worker, Fellow, volunteer or student working on behalf of the College within their area is made aware of the existence of this policy and is asked to familiarise themselves with its contents as part of their induction;
- b) ensure that any employee, worker, Fellow, volunteer or 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.

c. Planning activities

No high-risk activities are anticipated.

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, as provided in *Annex C*, should be undertaken and documented.

It is the responsibility of the Head of Department to retain oversight of regulated activities within their area and to ensure:

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

d. 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;
- c) that the implementation and review of actions identified within a risk assessment is undertaken in a timely manner.

A safeguarding risk assessment template can be found at *Annex C*.

e. Physical contact

No member of staff, worker or volunteer should have physical contact with any child or adult at risk unless to prevent an accident or injury to them or anyone else (e.g. to prevent a fall or similar) or in a case where medical assistance is needed (e.g. to administer first aid or similar), in which case the prior consent of the affected person should be requested 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 adult at risk should always be within the guidelines of being minimal, open to scrutiny, with the person's permission (where practicable) and to their benefit alone.

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

f. Raising a safeguarding concern or allegation of abuse

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

Any person involved in the work of the College (Fellows, employees, volunteers, students or anyone working on behalf of the College in a paid or unpaid capacity) can raise a safeguarding 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 relevant Safeguarding Lead. Concerns or allegations can also be made directly to a Safeguarding Lead.

If any person feels unable to convey a concern to a Senior Member of the College, the NSPCC Whistleblowing Helpline should be used: 0800 0280285. Children may wish to speak to their parents first about anything or anyone that is worrying them or making them feel unsafe.

A referral should be made even when concerns are seemingly minor: in some instances, a pattern or range of minor incidents can, when taken together, amount to a more serious concern requiring investigation. It is therefore vital that a Safeguarding Lead is privy to all concerns as they arise.

In the event of immediate serious risk 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 relevant Safeguarding Lead should then be notified of the case.

g. Responding to a safeguarding concern or allegation of abuse

Those working with children or adults at risk and engaged in regulated activities may:

- a) have alleged abuse disclosed to them;
- b) suspect abuse is being carried out;
- 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 children or adults at risk be prioritised at all times.

It is not the College's responsibility to investigate any suspicions or allegations of abuse. 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.

During an investigation into an allegation of abuse, it may be appropriate to suspend a worker or remove them from having any contact with a child or adult at risk until the investigation has been carried out.

The Safeguarding Leads are responsible 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 an issue arise outside of normal working hours.

Any member of staff receiving concerns about the safety of a child or adult at risk should listen and take notes, making no promises of absolute confidentiality, then refer the matter at once to the relevant Safeguarding Lead. Notes should be comprehensive and factual and should use full names rather than being anonymised. Where handwritten notes are typed up later, original contemporaneous notes should be retained.

The relevant Safeguarding Lead should appropriately record any allegation or reported incident and retain it in line 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.

Where a suspicion or allegation of abuse 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 a suspected or alleged safeguarding breach to a safe place;
- b) suspend the individual(s) about whom a suspicion or allegation has arisen;
- c) prevent the individual(s) about whom a suspicion or allegation has arisen from engaging in any regulated activities.

The relevant Safeguarding Lead will be responsible for contacting any statutory agencies such as the Local Safeguarding Children Board (LSCB) or the Police, if necessary. The Safeguarding Lead will also be responsible for fulfilling any legal obligations to report an individual to the DBS.

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

h. Health and safety

The health and safety of people at work is paramount and the College is committed to providing a safe physical living, studying and working environment for its Fellows, staff, students, contractor and visitors. However, some of the College's premises may present additional hazards, and it is not possible for the College to guarantee the safety of children and adults at risk on all its premises.

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 will include first aid cover and accident reporting.

Any accident on College premises involving a child or adult at risk must be reported to the College Porters, who will inform the Head Porter and/or College Health and Safety Manager, as soon as possible. The accident book used to record any accident is available at the Porters' Lodge.

Unless they are Fellows, students of the College or members of staff, or are attending the College on authorised visits or activities, children are prevented from entering food preparation areas, rooftops or other premises which present particular hazards or contain fragile or valuable equipment. Those premises which are out of bounds to children should be identified as such, but if there is any doubt, advice should be sought from the College Porters, Building and Maintenance Department or relevant Head of Department.

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.

i. Confidentiality

Safeguarding concerns will always be taken seriously and those who raise such concerns will not be subject to any detriment. However, 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.

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

j. Communications and contact

Contact should not be made with any child or adult at risk for any reason other than that related to the work or activity being undertaken. Staff are expected to maintain the College's reputation

for integrity and responsibility in dealing with children or adults at risk and should not enter into non-work-related arrangements with them, including contact via social media.

7. 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 Head of HR. Furthermore, a copy of this policy will be given to all relevant bodies with which 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 will take effect from October 2023. The Safeguarding Leads have responsibility for implementing and monitoring this policy, which will be reviewed annually and additionally whenever there are relevant changes to legislation or working practices.

8. 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 DBS under this legislation.

9. Contact details

Safeguarding Lead: Staff
Amanda Greaney, Head of HR
01223 334848
hr@dow.cam.ac.uk

Safeguarding Lead: Students & Visitors
Prof Guy Williams, Senior Tutor
01223 334811
senior-tutor@dow.cam.ac.uk

Safeguarding Deputy: Staff

Safeguarding Deputy: Students & Visitors
Dr Kate Daniels, Head of Student Wellbeing

01223 761276
student.wellbeing@dow.cam.ac.uk

Cambridgeshire Children's Social Care (Children)
Tel: 03450 455203

Cambridgeshire Local Authority Designated Officers (LADO) for Safeguarding (Children) Tel:
01223 727967, 01223 727968, 01223 727969
Out-of-hours emergency duty team: 01733 234724
lado@cambridge.gov.uk

Cambridgeshire Adult Safeguarding Board (Adults)
Tel: 03450 455202
Out-of-hours emergency duty team: 01733 234724 referralcentre-
adults@cambridgeshire.gov.uk

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 Policy on Safeguarding Children and Adults at Risk. It applies to all College Fellows, employees, students or volunteers, whether acting in a paid or unpaid capacity:

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 should therefore 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 promptly addressed.

In your role, you may become aware of, or suspect another person of, abusing a child or adult at risk. Likewise, they may disclose an allegation of abuse to you. You should raise any concerns without delay with your Head of Department or, where this is not possible, you should notify the relevant Safeguarding Lead 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.

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 know what to do should a child or adult at risk make 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 address 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) where you give feedback, ensure it is constructive and not unnecessarily negative;
- h) avoid being in a situation where you are alone with a child or adult at risk and make sure others can clearly observe you;
- i) ensure 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 relevant 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;
- c) allow yourself to be drawn into inappropriate attention-seeking behaviour;
- d) show favouritism towards 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 or email address) 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 not acted on;
- j) allow personal preconceptions about people to prevent appropriate action from being taken;
- k) give or accept gifts which could in any way 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 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.

3. Dealing with suspicions, allegations or disclosures 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 (to establish that there is suspicion of harm), then refer the matter to the appropriate individual as set out in this 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, for the allegation to be addressed, you will have to talk to other people about it. Explain whom you will talk to.
- e) Avoid 'leading' questions or expressing a view on 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, speak to your Head of Department or the relevant 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. As far as is possible, write down exactly what was said in the person's own words. Include times, places and as much detail as you can remember. Ensure that the note is as factual as possible and avoid assumption, speculation or opinion. Sign and date the notes. Bear in mind that the notes will be disclosable to both internal and external agencies.

ANNEX B: ROLE OF THE SAFEGUARDING LEAD (AND DEPUTY)

This guidance should be read in conjunction with the College's Policy on the Safeguarding of Children and Adults at Risk.

The role of the Safeguarding Lead (and Deputy) 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 children and adults at risk.

4. To report annually to the Education Committee on matters concerning the protection of children and adults at risk and on the operation of the College's Policy on Safeguarding Children and Adults at Risk.

ANNEX C: SAFEGUARDING RISK ASSESSMENT FORM

College Dept:	
Head of Dept and contact details:	
Safeguarding Lead and contact details:	
Date risk assessment written and revised:	
Outline description of 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 in place)	Risk level (see risk matrix below)	Further action (if needed, including names and dates)

Risk Matrix		Likelihood			
		High	Medium	Low	Negligible
Potential probable consequences	or 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