**St John’s College Children and Vulnerable Adults Safeguarding Policy**

Please note that a separate policy and procedure exists in relation to the College Choir.

**Statement of Policy**

This document states the College’s policy on preventing and reducing harm to children and vulnerable adults when they are in contact with College staff, workers, volunteers or students. It should be noted that the definition of children under the legislation includes any person under the age of 18. The policy aims to:

* Promote and prioritise the safety and wellbeing of children and vulnerable adults;
* Provide assurance to parents, carers and other parties that the College takes reasonable steps to manage risks and keep children and vulnerable adults safe;
* Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters;
* Prevent the employment of individuals in work with children and/or vulnerable adults 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;
* Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or vulnerable adults arising from contact with College staff, workers, students or volunteers, whether the harm has taken place on College premises or not.

This policy applies to the College’s employees, workers (including agency workers), volunteers and students. References to staff shall be taken to include workers, volunteers and students where relevant.

The Children and Vulnerable Adults Safeguarding Policy also seeks to manage effectively the risks associated with activities and events involving children and vulnerable adults through heads of department:

* Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these;
* Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis;
* Ensuring that the appropriate DBS or basic disclosure checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children or vulnerable adults or amending the responsibilities of the role such that a check is not required;
* Requiring new employees and individuals involved in working with children or vulnerable adults to familiarise themselves with the content of this policy and the associated Code of Conduct which is set out in Appendix B.

This policy requires that any suspicions and allegations involving harm to children and vulnerable adults are referred immediately to the Senior Tutor as the Designated Safeguarding Lead to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect staff, workers, students and volunteers from false or unfounded accusations.

**Roles and Responsibilities**

The Senior Tutor is the College’s designated safeguarding lead. As such, he/she takes overall ownership of the policy and will promote the importance of safeguarding within the College. The day-to-day operation of the policy and its procedures will be the responsibility of other individuals, as outlined below. Any queries about this policy or its application should be directed to the Senior Tutor in the first instance.

Each head of department is accountable for the adoption and implementation of this policy in their area. They are required to promote the importance of safeguarding within their department and ensure that appropriate systems are in place for:

* All their staff to become familiar with the Children and Vulnerable Adult Safeguarding Policy during their induction;
* Reviewing the department’s activities and following the Children and Vulnerable Adults Safeguarding risk assessment process.

It is the responsibility of the head of department for a recruitment campaign, activity or event that involves working with children and vulnerable adults to:

* Identify that the Children and Vulnerable Adults Safeguarding procedure which is set out below is applicable to a particular role, activity or event;
* Inform HR if a check is required for a post which is to be recruited to, so that the correct documentation can be used as part of the recruitment process;
* Discuss with HR if uncertain whether a check is required to ensure appropriate checks are carried out;
* Ensure that staff, workers, volunteers and students working with children and vulnerable adults are familiar with the contents of the policy and its application before any new or changed activity/event;
* Complete/update risk assessments for their area;
* Ensure implementation and review of the actions identified by these risk assessments.

Staff, students and volunteers working with children and vulnerable adults within the College should be familiar with this policy and will be asked to sign a form to confirm that they have read the code of conduct. In addition, they should, wherever possible, conduct themselves in accordance with the Code of Conduct set out in Appendix B. This provides guidance on acceptable and desirable conduct to protect both children and vulnerable adults who come onto College premises to study and to visit, and those working with them.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the Senior Tutor in accordance with this policy, using the form at Appendix D.

The Senior Tutor and, if he/she is not available, the Dean of Chapel or Chaplain, will be the initial points of contact where any allegations of abuse against children and vulnerable adults are raised. They will hold responsibility for:

* Dealing with any reported suspicions and allegations of abuse of children or vulnerable adults within the College.
* Providing appropriate information when making referrals to external agencies (such as Social Services or the Police) in all cases of suspected abuse of children or vulnerable adults.
* Ensuring that appropriate records are kept in relation to the reporting of suspected abuse.
* Working with the relevant head of department/College Officer to determine whether a referral needs to be made to the DBS.

**Context**

The College has a duty, both in law and as a responsible organisation, to take reasonable care of children and vulnerable adults coming onto its premises. The College aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and vulnerable adults. The College encounters children and vulnerable adults in a variety of settings, including through its teaching and research activities, as well as through its outreach programmes.

Safeguarding in relation to children is defined by the Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as requiring:

*“Agencies [and organisations] working with children and young people to take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about children and young people’s welfare, all agencies [and organisations] take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies’.*

The College is fully committed to meeting the requirements of safeguarding, as defined above, both in relation to children and vulnerable adults, in order to ensure that they are safeguarded whilst enjoying opportunities to develop their full potential.

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

* Health and Safety at Work Act 1974
* Rehabilitation of Offenders Act 1974
* Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
* The Police Act 1997
* Protection of Children Act 1999
* Management of Health and Safety at Work Regulations 1999
* The Human Rights Act 1998
* Sexual Offences Act 2003
* The Children Act 2004
* Safeguarding Vulnerable Groups Act 2006
* Equality Act 2010
* Protection of Freedoms Act 2012

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

The College is committed to treating everyone equally in accordance with the law and regardless of their age, race, sex, gender reassignment, sexual orientation, marriage or civil partnership status, pregnancy or maternity or disability.

**Application and definitions**

**Application**

The key parts of this Children and Vulnerable Adults Safeguarding Policy apply as described below.

* Risk assessment process
* Recruitment to a new or existing post which involves working directly with children and/or vulnerable adults;
* The commencement of new activities or events involving or potentially involving children and/or vulnerable adults; and
* Changes being made to activities or events involving or potentially involving children and/or vulnerable adults.
* Screening check processes

These apply to those carrying out work for the College that involves direct contact with children and/or vulnerable adultsand meet the eligibility criteria for a basic disclosure or DBS check.

* Procedure for dealing with reported suspicions and allegations

This applies to all College members of staff, workers, volunteers, visitors and students made aware of, or involved in, an allegation or suspicion involving harm to children and/or vulnerable adults.

* Appendix B Code of Practice

This applies to all College members of staff, workers, volunteers, visitors and students who come into direct contact with children and/or vulnerable adults.

**Definitions**

A child is any person under the age of 18.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult is vulnerable if he/she is subject to a “regulated activity”. This means for example that an adult will be vulnerable if he/she:

* receives healthcare from a regulated healthcare professional,
* receives psychotherapy or counselling related to such healthcare,
* receives personal care
* receives social care from a regulated social work professional,
* receives assistance with specified household matters by reason of age, illness or disability. The specified “household matters” are managing cash, paying bills or doing shopping.

Whilst this is not an exhaustive list, some of the indicators that an adult may therefore be vulnerable are if he/she:

* Has a learning or physical disability; or
* Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
* Has a reduction in physical or mental capacity; or
* Is in the receipt of any form of healthcare; or
* Is detained in custody; or
* Is receiving community services because of age, health or disability; or
* Is living in a sheltered or residential care home; or
* Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

It is recognised that people who meet one or more of the criteria above may not be vulnerable at all, or all of the time and that until there is direct contact with people on an individual basis, it may be impossible to identify whether vulnerability exists in relation to an activity or event involving adults that is being planned.

Therefore, in order to support heads of department in identifying and managing potential risks of harm to people effectively, and for the purposes of this policy only, a vulnerable adult[[1]](#footnote-1) should be identified (for the purposes of this policy only) as a person aged 18 or over who meets one or more of the criteria listed above should be assumed to be a vulnerable adult for the purposes of this policy.

The Disclosure and Barring Service website links to further detailed guidance on the definition of “regulated activity”: https://www.gov.uk/government/collections/dbs-eligibility-guidance

**Examples of College activities involving children and vulnerable adults**

College staff or students may encounter children and vulnerable adults in a wide range of situations. Some examples include:

* Teaching undergraduates who are under 18;
* Pastoral care of undergraduates who are under 18.
* Working with disabled students;
* Dealing with undergraduates who are incapacitated by alcohol or other drugs;
* Performing interviews of applicants;
* Open days;
* Widening participation outreach activities with schools and colleges (in Cambridge and external);
* Work experience students under 18;
* Dealing with lost children of tourists;
* The provision of healthcare or health services;
* Research work, which involves direct physical contact with children and/or vulnerable adults;

See also the position regarding student placements under the heading “Student work placements” below.

**Procedure**

**Raising awareness of the policy**

The HR team will ensure that all new members of staff are made aware of this policy during their HR induction. Heads of department will ensure that all new members of staff and relevant students/volunteers are given time to read the policy during their induction period. This requirement is included in the Induction Checklist.

**Initiating the Risk Assessment Process**

Organisations are required under health and safety legislation to protect people as far as is ‘reasonably practicable’. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Children and Vulnerable Adults Risk Assessment Process set out below will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the head of department):

* Recruitment to a new or existing post which involves working with children and/or vulnerable adults;
* The commencement of new activities or events involving or potentially involving children and/or vulnerable adults;
* Changes being made to activities or events involving or potentially involving children and/or vulnerable adults.

Please note that where there are multiple posts, activities or events of a similar nature, it is unnecessary to complete an individual risk assessment for each of them. Instead, it is possible to complete an overarching assessment for a particular type of post, activity or event and ensure that it manages the relevant risks appropriately.

Once it has been identified that the risk assessment process should be initiated, it is vital that the head of department responsible for the relevant recruitment campaign, activity or event includes completion of this within his/her planning process and ensures that it is completed. In the case of a recruitment campaign, the head of department must inform HR if a DBS check is required for the post so that the correct documentation can be used as part of the recruitment process.

**Completing the Risk Assessment Process**

A risk assessment is one of a number of methods used by the College to assess and mitigate or eliminate risk. A risk assessment must be completed in advance of the relevant recruitment campaign, activity or event by the head of department (where there are not current, adequate and documented risk management procedures already in place). The *‘Health & Safety Risk Assessment form’* is provided in Appendix F to assist with this process.

The purpose of the risk assessment is to enable the head of department to identify, mitigate and remove any potential risks relating to contact with children or vulnerable adults. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or vulnerable adult and considering whether the activity could be supervised or observed by others.

Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

The risk assessment should:

* Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised;
* Consider if there will be children and adults who are particularly at risk;
* Consider whether any children or vulnerable adults have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties;
* Identify any potential areas for harm;
* Evaluate the risks;
* Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented;
* Identify those situations that would require a DBS check or a basic disclosure check.

Completed risk assessments should be retained by the head of department whilst an activity/event is on-going and for five years after it has ceased (or the risk assessment has been superseded). Where an activity is on-going but unchanged, the head of department should review the risk assessment on a regular basis to ensure that the measures put in place are still relevant and appropriate. Normally such reviews should occur at least annually. Judgment should also be exercised to decide whether a review should be triggered more quickly if new information comes to light, or if practices or risks change or it is anticipated they will change.

**Identifying required checks**

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with children and/or vulnerable adults.

Where a check is required for a post being recruited to, the head of department must inform HR prior to the recruitment process so that the correct documentation can be used.

The head of department must also consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed) or if there are activities that the individual could reasonably and safely carry out before the check result has been received.

Further information on when a check should be treated as essential or non-essential for completion before an individual starts work can be found in the DBS guidance on HR Online (identify screening checks).

**DBS checks**

St John’s College School is a registered body with the DBS and the College undertakes checks via the School. Registered bodies are entitled in law to apply for a DBS check **only** where the position is included in the DBS's list of eligible posts. These posts represent the professions, offices, employments, work and occupations that are known as the exceptions to the Rehabilitation of Offenders Act 1974.

There are two types of check available from the DBS:

* **Standard** - contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not ‘protected’. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS's website.
* **Enhanced** - contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with children or adults in regulated activity (particular types of work with children and adults).

A number of roles in the College which involve working directly with children and vulnerable adults fall into the category of ‘regulated activity’ and so are eligible in law for an enhanced DBS check with appropriate barred list check. The most common regulated activities which take place in the College are:

* Teaching, training, instructing or supervising children whilst unsupervised at least once a week or more or on four days or more in a thirty day period; and
* Health care provided by, or under the direction or supervision of a regulated health care professional (please note that this only needs to be on one occasion).

It should be noted that teaching, training, instructing, caring for or supervising a 16 or 17 year-old's employment (which includes supervised work experience) is not regulated activity and a DBS check may not be requested. A DBS check may only be required for work experience students under 16 in the rare event that the same person is teaching, training, instructing, caring for or supervising them whilst unsupervised on a frequent/intensive basis. As a reminder, neither a child nor a vulnerable adult should be left unattended with a work experience student.

In addition to the sorts of roles identified above, an individual may be eligible for an enhanced DBS check where his/her work is:

* Concerned with the provision of health services;
* Of a kind as to enable the individual concerned to have direct, physical contact (such as interviews or focus groups) with persons in receipt of such services in the course of his/her normal duties;
* Dealing with an undergraduate who is incapacitated by alcohol or other drugs.

Full details of the roles which are eligible for DBS checks can be found in the attached matrix of roles in Appendix C. The head of department should review this eligibility criterion at the start of the recruitment process, or as soon as the duties of a role change, to identify whether a DBS check is required and, if it is, which type.

Ideally when the College is recruiting for a role for which a DBS check is required, the DBS check should only be carried out once a successful applicant has been selected and has indicated a wish to accept the post.

Please note that DBS checks for students are managed by the Student Registry at the University. Their process is set out in the DBS section of the Student Registry web pages of the University website.

**Basic Disclosures**

Disclosure Scotland is the Scottish equivalent of the DBS and its services can be used by employers throughout the UK. It differs from the DBS in that it offers basic level criminal records checks (known as basic disclosures), which only reveal convictions which are unspent under the Rehabilitation of Offenders Act 1974. This means that, unlike DBS checks, eligibility for basic disclosures is not restricted in law. Employers may choose to require basic disclosures as they deem reasonable for certain work.

The College may request a basic disclosure for a role where the nature of the work means that the College believes that it is reasonable and proportionate to obtain information about a prospective employee’s unspent criminal convictions (or those of a current employee moving role) in order to manage risk. In the circumstances where an individual will have direct contact with children or vulnerable adults as a central part of their role, but where they are ineligible for a DBS check, they may still be eligible for a basic disclosure.

At the start of the recruitment process or planning for an activity/event, and as part of the risk assessment process, the head of department will need to assess for such roles:

* The nature of the contact with children/vulnerable adults;
* The level of risk arising from the duties/responsibilities of the role;
* Whether a basic disclosure would be relevant to managing that risk;
* If there are more effective alternative means of managing the risk.

The head of department will need to determine whether the check must be completed before an individual can start work or if there are activities that the individual could reasonably and safely carry out before the check result has been received.

**Portability**

Where an individual has previously undergone a DBS check or basic disclosure required for his/her post with another organisation in the course of his/her employment, this check is not portable to the College. It will not be accepted as meeting the College’s requirement for a post-holder to undergo a particular type of DBS check or basic disclosure.

Exceptions to this are as follows:

* Where an individual has subscribed to the DBS Update Service – this means that their DBS check will be kept up-to-date and they can take this with them from role to role, where the same level and type of check is needed. With an individual's permission, the College will be able to go online to do a free, instant check (known as a status check) to confirm that their DBS Certificate is still up-to-date.
* Where a DBS check or basic disclosure has been carried out within the last 12 months by the College for a post with comparable duties. This will be agreed on a case by case basis.

**Disclosure of a criminal record**

Where a criminal conviction is disclosed by an applicant or through a DBS check/basic disclosure, a member of the HR team will work with the head of department (where appropriate) to complete the *‘Objective Assessment for Disclosure of a Criminal Conviction Form’*. This contains details of the check result, the individual’s explanation and an assessment of the level of risk.

The Senior Tutor will consider this assessment objectively and, where the assessment indicates that the level of risk is too high to allow the individual to start/continue working in a particular role/activity, the consequences of this for the individual will be dependent upon:

* The check concerned;
* The reason for the check (that is, check for a new employee, a recheck for an existing employee in their current post or a check for an existing employee in a new post);
* Relevant legislation;
* The post concerned;
* Whether the individual is suitable for other employment opportunities available within the College.

Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

It is a criminal offence to recruit and permit an individual whom the College knows or reasonably believes to be on the children’s barred list to work with children or to permit an individual whom the College knows or reasonably believes to be on the adults’ barred list to work with vulnerable adults.

**Recruitment of ex-offenders**

The College welcomes applications from a wide range of candidates, including those with criminal records. Having a criminal record will not necessarily bar an individual from working at the College. This will depend on the nature of the position and the circumstances and background of the offence.

The College complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a disclosure because of a conviction or other information revealed.

**Dealing with reported suspicions and allegations**

Concerns for the safety and wellbeing of children and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse.

According to the Department for Education and Skills, there are four main types of abuse, which are outlined in Appendix A. It is not always easy to recognise a situation where abuse may occur or has taken place and College employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone’s behaviour towards a child or vulnerable adult, including any behaviour which does not fit squarely within the four categories of abuse set out in Appendix A. It is important that the recipient of any complaint or accusation that a child or vulnerable adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised. The *‘Incident Report form’* is provided for this purpose.

It is impossible to promise complete confidentiality when a concern is raised or an accusation made to the College. This is because the College owes a duty of care to its staff, workers, students or visitors that cannot be fulfilled unless the College takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to the College, should be informed.

Where an individual suspects or is informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking part in a College activity/event or through contact with College staff, workers, volunteers or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must complete a Safeguarding Concern Form [see Appendix D] and contact the Senior Tutor immediately or, if he/she is not available, the Dean of Chapel or Chaplain. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000, Childline on 0800 1111 or Cambridgeshire Social Care 0345 045 5203. They can also make the referral formally (if required) via ReferralCentre.Children@cambridgeshire.gov.uk).

Where a complaint of abuse is reported, the Senior Tutor will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant head of department or College Officer and to take further action through the relevant internal procedures. This may include invoking the College’s employee disciplinary procedures, or in the case of students, the student disciplinary procedures.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), College staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with the Senior Tutor. Where this is necessary, the Senior Tutor should be informed immediately afterwards. In such cases, a criminal investigation may follow.

The College has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral must be raised with HR in the first instance as soon as harm or a risk of harm is identified. A member of the HR team and the Head of department/College Officer should work together to complete the DBS referral form found on the DBS’s website.

The completed form must then be provided to the Senior Tutor for review and a final decision on whether the referral is required.

Any enquiries made by the media about possible allegations of abuse regarding children/vulnerable adults should not be responded to and should be referred to the Communications Manager immediately.

**Student work placements**

If a concern is raised by a third party about a student undertaking a work placement, for example in a school or hospital, and the alleged incident occurred at that site rather than on College grounds, the allegation should still be referred to one of the College’s Designated Safeguarding Officers in the same way as any other incident. The Designated Safeguarding Officer will raise the matter with relevant institution in the first instance for it to consider the allegation in line with its own safeguarding procedures. Separately the Designated Safeguarding Officer will also consider the position as appropriate under the College’s own policy.

**Data protection**

All data provided will be treated in accordance with the College’s Data Protection Policy.

**Implementation and Review**

This policy will come into force from Michaelmas Term 2016 and will be reviewed by the HR Committee annually.

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| --- | --- | --- | --- |
| Chair of HR Committee | Date Reviewed | Updates Made | Date of next review |
|  |  |  |  |

**Appendix A – Types of Abuse**

The categories of abuse below are produced from external guidelines[[2]](#footnote-2). A person may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm. There are four main forms of abuse, although there are variations within these:

* **Physical Abuse**

Deliberate physical harm to children and vulnerable adults or any other form of harm which causes illness in a child or vulnerable person.

* **Sexual Abuse**

Forcing or manipulating a child or vulnerable adult to take part in sexual activities.

* **Neglect**

This involves the persistent failure to meet a child or vulnerable adult’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’ or vulnerable adult’s health or development.

* **Emotional Abuse**

This involves the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child’s/young adult/vulnerable adult emotional wellbeing and/or development.

**Appendix B**

**Safeguarding Children and Vulnerable Adults**

**Code of Conduct**

When working with children and/or vulnerable adults, College staff, workers, students and volunteers are expected to take account of the guidance below in the way that they conduct themselves. For these purposes a child is defined as any person under the age of 18. An adult aged 18 or over has the potential to be vulnerable (either temporarily or permanently) if he/she:

* Has a learning or physical disability; or
* Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
* Has a reduction in physical or mental capacity; or
* Is in the receipt of any form of healthcare; or
* Is detained in custody; or
* Is receiving community services because of age, health or disability; or
* Is living in a sheltered or residential care home; or
* Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

The above list is indicative rather than exhaustive - refer to the College’s Children and Vulnerable Adults Safeguarding Policy for further guidance.

General Guidance

* It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003, which created a new criminal offence of abuse of “a position of trust”.
* In a situation where you are alone with a child or vulnerable adult, where possible ensure that others can clearly observe you.
* When visiting a student’s room, follow the guidance on room visits in the staff handbook i.e.
	+ Display ID at all times or show ID to the occupant before entering room
	+ Knock on the door and allow sufficient time for the occupant to open the door or call out a response
	+ If there is no response after a second knock, use the key to enter the room and loudly announce presence
	+ If the occupant is asleep or in the shower, leave the room and return later
* Avoid:
	+ Taking a child or vulnerable adult alone in a car on journeys, however short.
	+ Taking a child or vulnerable adult to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person).
	+ Personal relationships with a child or vulnerable adult.
	+ Unnecessary physical contact.
* Do not:
	+ Make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted
	+ Take children or vulnerable adults to your home
	+ Worry that you will be breaching data protection laws if you make a report. Data protection law does not prevent making an honest report about incidents, concerns or suspicions.
* Report:
	+ Where you suspect or are informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking part in a College event/activity or through contact with College staff, workers, volunteers or students, this should be reported direct to a Designated Safeguarding Officer [Senior Tutor, Dean of Chapel or College Chaplain] and ensure that any allegations are recorded in accordance with the College’s Children and Vulnerable Adults Safeguarding Policy. The same procedure should be used for allegations of historic abuse.
	+ Any concerns about poor practice to the relevant Safeguarding Officer.

Social Media

* Staff, students, workers and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
* Only official College social media should be used for engaging with the wider community about College matters, including events/activities. Inappropriate or abusive comments should be removed swiftly and abusive individuals blocked/reported.
* Facebook instant chat and other similar functions should not be used to interact with children or vulnerable adults.
* Maintain confidentiality about sensitive information.

Photography

* Where it is necessary for staff, students or volunteers to take photographs or video images of children or vulnerable adults, written consent must be obtained (from parents/guardians in the case of children) before these images are taken to comply with the Data Protection Act 1998. Personal details and photos that clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs (e.g. when taking place in a sporting activity).

Events e.g. admissions/school visits

* Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
* Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
* Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.

Appendix C

Matrix of Roles requiring Safeguarding training or DBS checks

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**Appendix D**

**Safeguarding Concern Form including Guidance for Staff**

Safeguarding Concern Form

Please read the attached guidance before completing this form

|  |  |  |  |
| --- | --- | --- | --- |
| **Today’s Date** |  | **Time** |  |
| **Full Name of Child or Vulnerable Adult** |  |
| **Date of Birth** |  |
| **Gender** |  |

|  |
| --- |
| **Name & Role of Person Completing the Form** |
|  |
| **Date, Time and Place of the Incident/Concern:** |
|  |
| **Description of the Incident/Concern:** |
|  |
| **Telephone number and email address of Person Completing the Form** |
|  |
| Signature of Person Completing the Form: |
| **Please pass this form immediately to the Designated Safeguarding Officer who should complete the section overleaf** |

To be completed by the Designated Safeguarding Officer:

|  |
| --- |
| **Received by:** |
|  |
| ***(Designated Person for Safeguarding)*** |
| **Initial Action taken by the Designated Person** |
|  |
| **Has the parent/guardian been informed of the concern?** | YES/NO |
| **If YES, please state name of parent/guardian** |
|  |
| **If YES, please state who informed the parent/guardian, action taken and the outcome** |
|  |
| **If NO, please provide the reason why not:** |
|  |
| **Has a decision been made to refer the concern to an external agency?** | YES/NO |
| **If YES, please state which agency and contact details** |
|  |
| **If NO, please provide the reason why not:** |
|  |
| **Date** |  | **Time** |  |
| **Details of any further action taken or relevant information (this may include follow-up calls, feedback from other professionals, etc. and should include details). A separate sheet can be used, if required.** |
|  |
| **Please ensure a record of this form is added to the person’s College records.** |

**Referring a Safeguarding Concern**

**Guidance for Staff**

**If you have a concern that may relate to safeguarding, it should always be referred to one of the designated Safeguarding Officers (Senior Tutor: 38658 or 07927 572442, Dean of Chapel: 68633 or 07795 580159, or Chaplain: 38617 or 07917 535940).**

**In such circumstances, you will be asked to complete a Safeguarding Concern Form [attached] which can also be downloaded from the HR section of the College’s website and is available from the Forecourt Porters’ Lodge.**

**What to do if a person tells you of a safeguarding issue:**

LISTEN – be calm and reassuring. Be sensitive to the person. Do not ask leading questions.

EXPLAIN – what you intend to do and that you may not be able to keep it confidential,

PASS ON – your concerns to a Designated Safeguarding Officer without delay, and

RECORD – the details of your conversation as soon as possible and always before the end of the day on the Safeguarding Concern Form.

Avoid jumping to conclusions, speculating or making promises you cannot keep.

**How notes should be made**

* Enter your notes on the Safeguarding Concern Form available in the Forecourt Porters’ Lodge or on the HR section of the College Website
* Notes may be word processed, but not saved on disc or hard disc.

**Some useful points about record-keeping procedures**

• Give as full a description as possible.

* Identify the source of the information e.g. 'Mrs. Smith, a College Porter, informed me that…' or 'I saw Jane in her room …'

• Information should be factual or based on fact.

• Record what you saw, heard etc. and try to be specific. (e.g. 'Jane was crying and rocking' rather than 'Jane was upset'.)

• Record any physical signs of hurt and add notes or a description if appropriate.

• Opinion is okay as long as you can justify it in some way.

* If you suspect abuse, describe what alerted your attention to the situation

• Make a note of the information and with whom you shared it.

• Avoid specialist jargon which a member of another agency may not understand.

* Give the names of all those involved e.g. witnesses

**Where to look for information or advice**

* The Designated Safeguarding Officers are the Senior Tutor, or if the Senior Tutor is unavailable, the Dean of Chapel or the Chaplain.
* If none of the above are available and you are worried about a person, telephone one of the useful contacts listed below:
	+ Cambridgeshire Direct Contact Centre (Social Care) Tel: 0345 045 5203
	+ Police Central Referral Unit Tel: 01480 847743 or 101
	+ DfE Prevent Helpline Tel: 020 7340 7264
* The Safeguarding and Child Protection Policy is on the College website or a copy is available from the Senior Tutor’s Office.
* Safeguarding Concern Forms are available on the College website or from the Forecourt Porters’ Lodge.

**Appendix E**

<http://www.cambridgeshire.gov.uk/lscb/>

**Appendix F – Health & Safety Risk Assessment Form**



1. Please note: this policy’s definition of a vulnerable adult does not normally apply to College employees/workers (except in situations where they receive healthcare from another member of the College). Reasonable adjustments for disabilities and any capability matters in the workplace are managed outside of this policy. Please contact a member of the HR team for further advice as required. [↑](#footnote-ref-1)
2. The Department for Education and Skills guidance: “What to do if you’re worried a child is being abused” (2006)

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/190604/DFES-04320-2006-ChildAbuse.pdf [↑](#footnote-ref-2)