

Wadham College Safeguarding Code of Practice

15 August 2018

1. Aim

1.1 The College is committed to providing a safe environment for all adults at risk¹ and children². The College may encounter adults at risk and children through its teaching, research, outreach, access or other activities. The College cannot act 'in loco parentis' and ultimate responsibility for children rests with those who have parental responsibility. This Code of Practice seeks to support activities involving adults at risk and children and to offer assurances to staff, students, volunteers and visitors that safeguarding³ will be dealt with effectively and in a timely manner, particularly in relation to the College's access and outreach events.

1.2 The College has a designated Safeguarding Lead and a designated Safeguarding Officer who will work with other agencies where appropriate to achieve its aims. A full breakdown of the responsibilities of the Safeguarding Officer and Safeguarding Lead can be found in annex A.

1.3 This Code of Practice should be read in conjunction with the University's policies referred to within this Code of Practice, or listed below.

2. Planning an Activity

2.1 Any member of the College who has responsibility for organising an activity involving adults at risk or children must nominate an individual to act as the designated safeguarding lead for the activity. In the case of Wadham College access work, this will usually be the Safeguarding Officer (Dr Hugh Munro, Access and Outreach Officer, access@wadham.ox.ac.uk) with support from the Safeguarding Lead (Dr Caroline Mawson, Senior Tutor, senior.tutor@wadham.ox.ac.uk).

¹ Defined by the Department of Health as "those who are or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."

The term 'adult at risk' has been used in place of the term 'vulnerable adult'. This is because the term 'vulnerable adult' may wrongly imply that some of the fault for the abuse lies with the adult abused. The term 'adult at risk' is used as an exact replacement for 'vulnerable adult', as used throughout existing government guidance to local authorities.

² A 'child' is any person under the age of 18; 'children' are to be construed accordingly. Particular care shall be afforded to a child under the age of 16.

³ Safeguarding and promoting the welfare of children is defined for the purposes of this document based on the Department for Education's 'Working Together to Safeguard Children' (2015) which encompasses:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

2.2 Activities should:

- be designed so that appropriate training and supervision is available to those working with adults at risk or children;
- minimise occasions on which members of the College will need to work alone in an unsupervised way with adults at risk or children; and
- be appropriately risk assessed.

2.3 Every activity which involves adults at risk or children should be risk assessed and the assessment should consider how the risks identified can be minimised and should also outline the local processes for reporting concerns, as well as taking account of Health and Safety considerations. Training requirements and records of training undertaken should be recorded in the risk assessment.

2.4 Completed risk assessments should then be made available to all staff or volunteers involved in the activity.

2.5 Guidance on health and safety for young people can be found on the [University's Safety Office website](#).

2.6 Any pre-employment or pre-activity checks should be carried out in accordance with the [University's guidance](#) and the College guidance (annex B).

2.7 Adults at risk and children who are participating in a College activity must, as part of their induction to the activity, be given clear information about how, and to whom, they can report concerns about any member of the College or University with whom they will be interacting. The contact details of both the Safeguarding Officer and Safeguarding Lead should be given, along with the designated safeguarding lead (if different to the Safeguarding Officer).

3. Training

3.1 Any member of the College who will be planning activities with adults at risk or children should have completed the online introduction to Safeguarding training provided by [Oxford Safeguarding Children Board](#), together with any additional training that may have been identified by the risk assessment process. An outline of the OSCB's training recommendations can be found on page 7 of their [training brochure](#).

As of 2018, the appropriate courses are as follows:

- For all members of staff who come into contact with children in any capacity as part of their work: 'An introduction to safeguarding children' training (Level 1), to be completed online and refreshed every 3 years. This would apply to the Admissions Officer and summer school mentors, for instance.
- For those involved in regulated activity with children (i.e. once a week or more, over 4 or more days in a 30 day period, or overnight): the above training and 'Generalist safeguarding

training' (Level 2), to be refreshed every 3 years. This may, for example, apply to Access Assistants.

- For the College's Safeguarding Officer and Safeguarding Lead: the above training and 'Designated Lead safeguarding' training (Level 3), to be refreshed every 2 years.
- For any member of College staff working with adults at risk: 'Safeguarding adults' training (Level 1), to be completed online and refreshed every 3 years.
- At least one member of each interview panel when recruiting for a role involving work with adults at risk or children: 'Safer recruitment' training, to be refreshed every 5 years.

3.3 Activity organisers (for example, involving residential courses for young people) may wish to arrange additional training.

3.4 Training can be recorded and monitored via the Academic Office with certificates of completion stored.

4. Dealing with suspicions or allegations of abuse

4.1 Those working with children and adults at risk may:

- have alleged abuse disclosed to them;
- suspect abuse is being carried out; or
- be accused of abusing those in their charge.

4.2 Whilst these issues may require very different courses of action (further guidance is given in annex C), it is essential that the safety and welfare of the adult at risk or child is prioritised. The risk assessment for any activity involving adults at risk or children should identify at least one individual who will act as the key contact point to deal with such matters (usually the Safeguarding Officer).

4.3 The Safeguarding Lead is responsible for nominating the Safeguarding Officer – or other deputies – to ensure that a nominated individual is available during normal working hours, to ensure that all allegations can be dealt with without delay. The procedure for this process is: respond, report; and record.

4.4 Any allegations or suspicions of abuse must be reported without delay to a relevant person, as listed below, who must then take prompt action.

- Where an adult at risk or child discloses alleged abuse, or a member of the College suspects abuse, this should be relayed to the Safeguarding Officer who will refer to the Safeguarding Lead. They will assess and, where appropriate, contact the relevant statutory agency for advice.
- In the event an allegation is made against College staff, students, volunteers or academic visitors this must be referred to the Safeguarding Lead who will assess and, where appropriate in cases involving children, refer the matter to the [Multi-Agency Safeguarding Hub](#). **This referral must be made within one working day of the allegations being made.** The [Local Area Designated Officer](#) will advise on the appropriate action to be taken. In cases

involving adults at risk of harm, referral will be made to the relevant statutory agency. If the allegation is against the Safeguarding Officer or Lead, it will be referred to the individual not involved. So, where an allegation is against the Safeguarding Lead, the Safeguarding Officer should be informed.

- **In the event there is a risk of immediate serious harm to an adult at risk or child the emergency services should be contacted via 999 or the police via the 101 service.** Anybody can make a referral in these circumstances. The Safeguarding Officer and Safeguarding Lead should then be notified of the case.
- All allegations, concerns, and accidents should be **recorded promptly** on the appropriate Concern, Incident or Matter Report (CIMR) form. These forms are available via and in hard copy in the Academic Office.

4.5 The Safeguarding Lead will share information, as appropriate with relevant colleagues to ensure that the relevant authorities both within and outside of the College are involved and that any necessary processes can be followed (for example, depending on the nature of the allegations, it may be necessary to make a disclosure to the Disclosure and Barring Service.)

4.6 Appropriate records will be retained in accordance with the College's and University's Data Protection policies. Where the matter may relate to both staff and students, the Safeguarding Lead will agree on where the file will be kept.

5. Useful links

5.1 External agencies

- [Oxfordshire Multi-Agency Safeguarding Hub](#)
- For children: [Oxfordshire Safeguarding Children Board](#)
- For at risk adults: [Oxfordshire Safe from Harm](#)

5.2 [Wadham College policy statements](#), including Wadham Equality Policy, Harassment Policy and Procedure and Equality Action Plan.

5.3 List of University of Oxford policy statements and codes of practice

A list of the University's key policies can be found at: www.admin.ox.ac.uk/lso/statutes/. The following are of particular relevance:

- [University of Oxford Safeguarding code of practice](#)
- [University Harassment Policy and Procedure](#)
- [University Equality policy](#)
- [University Data Protection Policy](#)
- [University Public Interest Disclosure \('whistleblowing'\) policy](#)
- [Safety Office: Health and Safety of young people and children](#)
- [Policy on the ethical conduct of research involving human participants and personal data](#)
- [Staff-student relationships:](#)

- [IT guidelines on handling illegal material](#)
- Personnel guidance relating to recruitment and pre-employment screening can be found on the [Personnel Services website](#)

Annex A: Roles of the Safeguarding Officer and Safeguarding Lead

This guidance should be read in conjunction with Wadham College's Safeguarding Code of Practice.

The role of the Safeguarding Officer (Access and Outreach Officer, access@wadham.ox.ac.uk) is as follows:

1. To raise awareness by:
 - ensuring regular review of the Code of Practice;
 - ensuring that the Code of Practice is easily accessible to College staff and visitors; and
 - appointing a designated safeguarding lead for work involving adults at risk or children where the Safeguarding Officer is not automatically the safeguarding lead.
2. To manage referrals by:
 - being the primary contact for those (particularly students) involved in work with adults at risk and children in the College to refer disclosures and concerns to;
 - keeping records of all disclosures and concerns; and
 - referring all safeguarding concerns to the Safeguarding Lead promptly.

The role of the Safeguarding Lead (Senior Tutor, senior.tutor@wadham.ox.ac.uk) is as follows:

1. To raise awareness by:
 - acting as a senior strategic figurehead for Safeguarding issues at the College; and
 - ensuring that the Code of Practice is implemented, and promulgated.
2. To manage referrals by:
 - advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the Code of Practice;
 - liaising with external agencies where appropriate (such as the Oxfordshire Safeguarding Children Board, Oxfordshire Social & Community Services, the Disclosure and Barring Service, the Police); and
 - ensuring that those involved in any case are appropriately supported.
3. To promote appropriate training by:
 - ensuring that appropriate information and training are available to members of the College who will come into contact with adults at risk and children; and
 - engaging in training themselves.

Annex B: Disclosure and Barring Service (DBS) checks for Wadham College staff

Enhanced DBS checks for staff (including temporary and casual staff) may be requested when the role in question involves 'regulated' activity with children or adults at risk, **and** when this work is undertaken frequently, intensively or overnight.

Definitions from the Department for Education's [Regulated Activity in relation to Children](#) (2012) are as follows:

Regulated activity is defined as unsupervised activity such as teaching, training, instructing, supervising or caring for children, or providing advice/guidance on well-being, or driving a vehicle only for children, if done regularly.

Frequent or intensive activity is defined as:

- activity undertaken once a week or more;
- activity undertaken on 4 or more days in a 30 day period;
- or overnight activity.

Overnight activity is that which occurs between 2am and 6am and with an opportunity for face-to-face contact with children.

An Enhanced DBS check is also required for those staff involved in the day-to-day management or supervision on a regular basis of a person meeting the above criteria. There are no additional frequency criteria here other than those already set out in the description – i.e. day-to-day and regular.

When recruiting for a post which will require a DBS check, it should be noted that at least one member of each interview panel must have attended the 'Safer recruitment training' provided by Oxfordshire Safeguarding Children Board (see Wadham College Safeguarding Code of Practice section 3.1).

From this, the following guidelines should be followed:

The Access and Outreach Officer must undergo an Enhanced DBS check, on the basis that their work with children is clearly regulated activity, which is both frequent and intensive.

The Access and Admissions Administrator and all Access Assistants must undergo an Enhanced DBS check, on the basis that their work will at times constitute frequent/intensive regulated activity.

The Academic Administrator and Senior Tutor should undergo Enhanced DBS checks, as line managers to the Access and Outreach Officer and Access and Admissions Administrator.

Student Ambassadors may on occasion engage in regulated activity, but this would never be frequent, intensive or overnight, and so a DBS check is not required. DBS checks will, however, be required for Summer School Mentors.

Open Day Helpers and Admissions Hosts should not usually require a DBS check, as they are supervised by the Access and Outreach Officer (and other Academic Office staff).

DBS eligibility requirements for those working with adults at risk are defined differently. Here, an Enhanced DBS check is required for those providing any of the following:

- Health care
- Personal care
- Social work
- Assistance with cash, bills and/or shopping
- Assistance in the conduct of a person's own affairs
- Conveying

More details can be found on the University's [Disclosure and Barring Service](#) page. As of May 2016, this does not currently appear to apply to any member of College staff.

Annex C: Guidance for those carrying out activities involving adults at risk or children

1. General considerations

1.1 If you are acting in a position of trust with children or adults at risk, you are expected to be mindful that you are acting as a role model and therefore should demonstrate exemplary behaviour.

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

1.3 All activities should have undergone a risk assessment, and you should have a copy of the risk assessment which will identify a key contact to whom any concerns should be addressed promptly.

1.4 In your role:

- you may become aware of, or suspect another person of abusing an at risk person, or an at risk person may disclose an allegation of abuse to you, and you will need to take action in such circumstances;
- allegations of inappropriate behaviour may be made against you, and such allegations will need to be investigated, and may result in referral to external agencies.

2. Types of abuse

2.1 The Government publication [Keeping children safe in education](#) defines abuse as: “a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.”

2.2 The same principles apply for at risk adults: abuse may be physical, emotional, sexual or neglect. As NSPCC define, “Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or sexual abuse.”

3. Expectations of those working with adults at risk or children

3.1 You should:

- Ensure you have completed the online course [An Introduction to Safeguarding](#) and that you know what you should do if an at risk person makes a disclosure to you;
- Ensure you are familiar with the risk assessment and understand who the key contact is for the activity you are engaged in;
- Give due regard to cultural difference;

- Be alert to and tackle inappropriate behaviour in others, including peer-to-peer behaviours. Abusive behaviour such as bullying (including cyber-bullying), ridiculing or aggression must not be allowed to go unchallenged;
- If you have to give feedback, take care that it is not unnecessarily negative;
- Take care that language is not open to sexual connotation;
- Report any suspicions promptly and confidentially to the College Safeguarding Officer (Dr Hugh Munro, Access and Outreach Officer, access@wadham.ox.ac.uk), or designated safeguarding lead for the activity. In the event that the suspicions/allegations involve that person, suspicions should be reported to the College Safeguarding Lead (Dr Caroline Mawson, Senior Tutor, senior.tutor@wadham.ox.ac.uk) or a University Safeguarding Officer (Julian Duxfield, University's Director of HR, director.hr@admin.ox.ac.uk or Gillian Hamnett, Director of Student Welfare and Support Services, director.swss@admin.ox.ac.uk);
- Deal with information sensitively.

3.2 You should not:

- Engage in, or allow, any form of inappropriate touching. 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;
- Use inappropriate language, or allow others to use it without challenging it;
- Engage in any physical 'adult' relationship with a person to whom you are in a position of trust, even if they give their consent;
- Give your personal contact details (such as personal phone number, home address, email, Skype address or other communication routes) to a child or an adult at risk, or use any such route to communicate with a child or adult at risk other than regarding the activity (for example through the official website for the activity);
- Interact in a personal capacity with children or adults at risk outside of the activity, including through any form of social media, for example, by becoming 'friends' on Facebook;
- Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on;
- Take photographs, or make other recordings of at risk people without specific written consent of the individual, or someone with parental responsibility for the individual.

3.3 You should seek advice from the Safeguarding Officer and/or Safeguarding Lead if:

- You suspect a relationship is developing which may be an abuse of trust;
- You are worried that a child or adult at risk is becoming attracted to you or a colleague who works with them;
- You think a child or adult at risk has misinterpreted something you have done or said;
- 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;
- A child or adult at risk tells you that they are being abused, or describes experiences that you consider may be abuse;
- You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

4. Dealing with allegations, or suspicions, of inappropriate behaviour

- Consider the urgency of the situation: in the event there is a risk of immediate serious harm to a child or an adult at risk the emergency services should be contacted via 999 or the police via the 101 service. Anybody can make a referral in these circumstances. The Safeguarding Officer and/or 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;
- In handling situations follow the rules identified by the OSCB of: being objective, being factual, only informing relevant parties, making no promises, signposting to the next steps, report in a timely manner, and record allegations.
- Remain calm, 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);
- DO NOT try to investigate or act on the matter yourself: doing so may seriously compromise investigation by the relevant authorities. You need only clarify what is being said to you (in order to establish that there is a suspicion of harm), and then refer the matter to the appropriate individual as set out in the Code of Practice;
- Be supportive but DO NOT promise confidentiality. Explain that, in order that the allegation can be addressed you will have to talk to other people about it. Explain who you will talk to;
- Avoid 'leading' questions, or expressing a view about what you have been told;
- Use clear language, appropriate to the person you are dealing with;
- Do not talk to anyone else about the matter. If you need to seek support for yourself you should speak to the Safeguarding Officer and/or Safeguarding Lead;
- Write down what you have been told as soon as possible. In all events this must be done on the same day but this should not delay prompt action. Write down exactly what was said in the person's own words as far as possible, include the time, place, and as much detail as you can remember, but ensure that the note is as factual as possible and avoid assumption, speculation or opinion. Sign and date the note. Bear in mind that the note will be disclosable to both internal and external agencies.

Annex D: Safeguarding of admissions candidates and undergraduate students under the age of 18

1. Candidates for admissions interviews

1.1 Candidates for admission to Wadham are invited to stay at the College for a period of days, during the interview selection process. The College recognises that it is likely that most candidates will be under the age of 18.

1.2 The College has established procedures for the interview process, designed to ensure safeguarding of candidates whilst also fulfilling selection requirements, including but not limited to:

- All student volunteers are appropriately trained and given specific information about how to respond to reports of neglect or abuse.
- All student volunteers are required to complete: 'An introduction to safeguarding children' training (Level 1).
- Any members of the College who may be alone with candidates for significant time (this does not include interviewers or housekeeping staff) are DBS checked.

2. Students under the age of 18

2.1 The College may admit students who commence their studies before their 18th birthday. The College recognises that:

- Anyone under the age of 18, as a matter of law is a child;
- The College has special duties of care towards a child;
- The College is not *in loco parentis*

2.2 The Senior Tutor is responsible for ensuring that the Domestic Bursar and relevant tutors are informed of the admission of any students under the age of 18.

2.3 The Domestic Bursar is responsible for ensuring that the hall, bar and lodge have the names of any students under the age of 18.

2.4 The Senior Tutor is responsible for gaining written agreement from students under the age of 18 that they accept the provisions put in place.

2.5 Tutors who have not been DBS-checked should consider the format of teaching when under-18s are involved (perhaps, for example, avoiding singleton tutorials, but also bearing in mind that one-to-one contact with tutors takes place at meetings outside tutorials).

2.6 When considering requests for vacation residence, special consideration will be given to students under the age of 18, in particular if circumstances mean they cannot feasibly stay with family members (for instance, if they are normally resident overseas).