

Gazette Supplement



University of Oxford Safeguarding Code of Practice

The following Safeguarding Code of Practice was approved by Council on 22 June 2015 to take effect from 1 October 2015. It supersedes the Code of Practice on the Protection of Children and Vulnerable Adults (Supplement (3) to *Gazette* No 4802, 21 March 2007).

1 Aim

1.1 The University is committed to providing a safe environment for all adults at risk¹ and children². The University may encounter adults at risk and children through its teaching, research, outreach, access or other activities. The University 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 safeguarding will be dealt with effectively and in a timely manner.

1.2 The University has two Safeguarding Officers who will work with other agencies where appropriate to achieve its aims. In clinical settings appropriate NHS safeguarding procedures will apply.

¹Defined 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.

²A '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.

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 University 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.

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 University 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. This may form a part of an application for ethics approval. 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 at www.admin.ox.ac.uk/safety/policy-statements/upss113 and an example risk assessment can be found at www.admin.ox.ac.uk/personnel/cops/safeguarding/safetrain.

2.6 Any pre-employment or pre-activity checks should be carried out in accordance with the University's guidance published at www.admin.ox.ac.uk/personnel/recruit/preempcheck.

2.7 Children and adults at risk who are participating in a University 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 University with whom they will be interacting. More than one point of contact should always be given and the details of the University's Safeguarding Officers included (in addition to the contact details of the nominated safeguarding lead for the activity) so that complaints can be made directly to these officers, where appropriate.

3 Training

3.1 Any member of the University who will be planning activities with children should have completed the online training provided by Oxford Safeguarding Children Board³, *An Introduction to Safeguarding*, together with any additional training that may have been identified by the risk assessment process.

3.2 Anyone holding the role of Safeguarding Officer and their deputies will undergo detailed training in safeguarding issues on a regular basis.

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 CoreHR system.

³www.oscb.org.uk/training

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 Annexe A), it is essential that the safety and welfare of the child or adult at risk 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. The nominated safeguarding contact for the activity is responsible for ensuring that concerns and allegations are escalated to the appropriate Safeguarding Officer without delay.

- Allegations against a member of staff, non-student volunteers or academic visitors, or suspicions of abuse involving a staff member who is considered to be an adult at risk or is under 18 years of age, should be reported to the University's Director of HR.
- Allegations against a student, or suspicions of abuse involving students who are considered to be an adult at risk or are under 18 years of age, should be reported to the Director of Student Welfare and Support Services.

4.3 Where both groups may be involved the Safeguarding Officers will jointly agree the most appropriate response. Where allegations relate to one of the Safeguarding Officers, the other Safeguarding Officer should be contacted.

4.4 The Safeguarding Officers are responsible for nominating deputies to ensure that a nominated individual is available during normal working hours, to ensure that all allegations can be dealt with without delay.

4.5 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 a child or adult at risk discloses alleged abuse, or a member of the University suspects abuse, this should be referred to the relevant Safeguarding Officer who will assess and, where appropriate, contact the relevant statutory agency for advice. Students should approach the Director of Student Welfare and Support Services and staff, non-student volunteers and academic visitors should contact the University's Director of HR.
- In the event an allegation is made against University staff, students, volunteers or academic visitors this must be referred to the relevant Safeguarding Officer 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 Officer⁴ 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.
- 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 relevant Safeguarding Officer should then be notified of the case.

4.6 Safeguarding Officers will share information as appropriate with relevant colleagues to ensure that the relevant authorities both within and outside of the University 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).

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

5 Useful links

External agencies

- Oxfordshire Multi-Agency Safeguarding Hub: www.oxfordshire.gov.uk/cms/content/safeguarding-hub
- For children: Oxfordshire Safeguarding Children Board: www.oscb.org.uk
- For at-risk adults: Oxfordshire Safe from Harm: www.safefromharm.org.uk

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/iso/statutes. The following are of particular relevance:

- University Harassment Policy and Procedure: www.admin.ox.ac.uk/eop/harassmentadvice
- University Equality policy: www.admin.ox.ac.uk/eop/universityofoxfordequalitypolicy
- University Data Protection Policy: www.admin.ox.ac.uk/councilsec/compliance/dataprotection
- University Public Interest Disclosure ('whistleblowing') policy: www.admin.ox.ac.uk/personnel/cops/pid
- Safety Office: Health and Safety of young people and children: www.admin.ox.ac.uk/safety/policy-statements/upss113
- Policy on the ethical conduct of research involving human participants and personal data: www.admin.ox.ac.uk/curec/about/policy
- Staff-student relationships: www.admin.ox.ac.uk/personnel/during/relationship
- IT guidelines on handling illegal material: www.it.ox.ac.uk/policies-and-guidelines/handling-illegal-material

Personnel guidance relating to recruitment and pre-employment screening can be found on the Personnel Services website: www.admin.ox.ac.uk/personnel.

⁴www.oxfordshire.gov.uk/cms/content/concerns-over-professionals-working-children

Annexe A - Guidance for University members carrying out activities involving adults at risk or children

This guidance should be read in conjunction with the University of Oxford Safeguarding Code of Practice.

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* (www.gov.uk/government/uploads/system/uploads/attachment_data/file/447595/KCSIE_July_2015.pdf) 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. They may be abused by an adult or adults or another child or children.'

2.2 The same principles apply for at-risk adults: abuse may be physical, emotional, sexual or neglect.

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 designated safeguarding lead for the activity, or, in the event that the suspicions/allegations involve that person, to the appropriate Safeguarding Officer for the University (contact details are available on the safeguarding website at www.admin.ox.ac.uk/personnel/cops/safeguarding);
- 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 designated safeguarding lead for the activity 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 relevant Safeguarding Officer should then be notified of the case and will need to determine whether to refer serious cases to the relevant authorities within one working day.
- 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 designated safeguarding lead for the activity or one of the University's Safeguarding Officers.
- 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.

Annexe B - Role of Safeguarding Officer

This guidance should be read in conjunction with the Safeguarding Code of Practice.

The role of the Safeguarding Officers is as follows.

1 To raise awareness by:

- acting as a senior strategic figurehead for safeguarding issues at the University;
- ensuring that the Code of Practice is implemented, and promulgated; and
- ensuring regular review of the Code of Practice.

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 University who will come into contact with adults at risk and children; and
- engaging in training themselves.