

# St Anne's Safeguarding Code of Practice

## 1 Statement

- 1.1 St Anne's College is committed to ensuring a safe and supportive environment for its students, staff and visitors. We may encounter children, and adults at risk, through teaching, research, outreach, access, and other activities.
- 1.2 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 and children at risk, and to offer assurances to staff, students, volunteers and visitors that safeguarding will be dealt with effectively and in a timely manner.
- 1.3 This Policy places the welfare of children and at risk adults as paramount and aims to safeguard their well-being, in particular by protecting them from abuse of any kind.
- 1.4 The College has a Designated Safeguarding Lead and at least two Safeguarding Officers who will work with other agencies where appropriate to achieve a safe environment for children and at risk adults. In clinical settings appropriate NHS safeguarding procedures will apply.
- 1.5 The College has a Nursery on site with its own [Nursery Safeguarding Policy](#) and designated officers.

## 2 Scope

- 2.1 For the purposes of this policy, 'child' or 'children' refers to a person or persons under the age of 18 (as defined in the *Children Act* 1989). 'Children' therefore means 'children and young people' throughout this policy. Particular care should be afforded to a child under the age of 16.
- 2.2 For the purposes of this policy, an 'adult at risk'<sup>1</sup> refers to a person or persons "*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*

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<sup>1</sup> 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.

*him or herself against significant harm or exploitation"* (Department of Health).

- 2.3 For the purposes of this policy, a College Member is anyone who is part of St Anne's College, working with children and at risk adults whether as a fellow, employee, student, or volunteer.
- 2.4 This Policy applies to all activities involving children and at risk adults, and to all College Members. The College recognises that it has a legal duty to safeguard the welfare of children and at risk adults who come onto its premises or come into contact with its Members under the 'Safeguarding Vulnerable Groups Act' 2006, 'Working together to safeguard children' 2013, the 'Health and Safety at Work etc. Act' 1974; and 'Keeping children safe in education' 2015 where contact comes through schools.
- 2.5 Where a College Member occupies a position of trust with regard to children or at risk adults, an improper relationship with a child or person with mental disorder that impedes choice, constitutes an abuse of trust under the Sexual Offences Act 2003.
- 2.6 The College also has certain powers and duties, under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and Safeguarding Vulnerable Groups Act 2006, to enquire as to the criminal records history of Members to assess any risk to children and at risk adults.

### **3 Students under the age of 18**

- 3.1 The College may admit students who commence their studies before their 18<sup>th</sup> birthday. In these cases, the College requires the student and their parent/guardian sign an agreement. This agreement can be found at [Annex C](#).
- 3.2 The College recognises that:
  - Anyone under the age of 18 is a child as a matter of law;
  - The College has special duties of care towards a child particularly when the child is under 16;
  - In agreeing for a child to study here a parent/guardian accepts that they are willing for their child/ward to receive the same degree of care and attention that the College gives its adult students. It is important that the parents/guardians understand the very adult environment that exists at a British

University and that they understand the course that their child/ward will be pursuing and what is involved in this.

- The College is not in *loco parentis*, except in the case of a medical emergency where written permission has been previously obtained from the parent or guardian of the child;
- Where appropriate, Tutors and other peripheral staff may be asked to complete DBS checks in line with Safeguarding procedures;
- The Senior Tutor, as the Designated Safeguarding Lead, is responsible for ensuring that the Admissions Officer, Principal, College Dean, Domestic Bursar, Dean of Welfare, appropriate JCR Committee members, and the HR department are informed of the admission of any students who will commence their studies before their 18th birthday.

- 3.3 The college asks all students to provide details of a trusted contact for emergencies relating to medical needs or welfare. For students under 18, parents/guardians must ensure that the College is supplied with emergency contact details and that these details are kept up to date. If the parents/guardians are not present in the UK, they should nominate a guardian in this country who will act for them if necessary.
- 3.4 The parent/guardian must agree for the College to arrange, in an emergency, medical care for their child/ward, until contact is made and the parent's/guardian's wishes ascertained.

## **4 Planning an activity**

- 4.1 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.
- 4.2 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.

- 4.3 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.
- 4.4 Completed risk assessments should then be made available to all staff or volunteers involved in the activity.
- 4.5 Guidance on health and safety for young people can be found on the University Safety Office website ([Policy Statement s1/13](#)). An example risk assessment can be found on the safeguarding website.
- 4.6 Any pre-employment or pre-activity checks should be carried out in accordance with the College's HR guidance on pre-employment screening.
- 4.7 Children and adults at risk 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 with whom they will be interacting. More than one point of contact should always be given, and the details of the College'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.

## **5 Training**

- 5.1 Any member of the College who will be planning activities with children should have completed the on-line introduction to Safeguarding training provided by Oxford Safeguarding Children Board<sup>2</sup>, together with any additional training that may have been identified by the risk assessment process.
- 5.2 Anyone holding the role of Safeguarding Officer will undergo detailed training in safeguarding issues on a regular basis. Activity organisers (for example, involving residential courses for young people) may wish to arrange additional training.

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<sup>2</sup> Details of the appropriate Safeguarding courses are available here <http://www.oscb.org.uk/training/>

5.3 Training is recorded and monitored by HR.

## **6 Dealing with suspicions or allegations of abuse**

6.1 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.

6.2 Whilst these issues may require very different courses of action (further guidance is given in [Annex A](#)), it is essential that the safety and welfare of the child or adult at risk is prioritised.

6.3 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 College's Head 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 Dean of Welfare.

6.4 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.

6.5 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 College 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 Dean of Welfare and staff, non-student volunteers and academic visitors should contact the College's Head of HR.

- In the event an allegation is made against College 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 Officer [Local Authority Designated Officer \(LADO\) \(oscb.org.uk\)](https://www.oscb.org.uk/) 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.

6.6 Safeguarding Officers 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).

6.7 Appropriate records will be retained in accordance with the College'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.

## 7 Useful links

For children: Oxfordshire Safeguarding Children Board: [www.oscb.org.uk/](https://www.oscb.org.uk/)

For adults at risk: Oxfordshire Safeguarding Adults Board:  
[www.osab.co.uk/](https://www.osab.co.uk/)

College policies and codes of practice can be found here [College Policies - St Anne's College, Oxford](#) including the Nursery Safeguarding Policy.

## 8 Contact Information

Designated Safeguarding Lead	Shannon McKellar – Senior Tutor Tel. 01865 274858
Safeguarding Officers	Hannah Snell - Senior Outreach Officer Tel. 01865 274825  Dom Birch – Outreach Officer Tel. 01865 274881  Rachel Busby – Dean of Welfare Tel. 01865 274884
Oxfordshire Children’s Social Care Oxfordshire Safeguarding Children Board	Tel. 01865 323048 (Office Hours) Tel. 0800 833408 (Out of Hours) Local Authority Designated Officer (LADO) <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a> Tel. 01865 815956
Police Child Protection Unit	Unit Tel. 01865 335199
NSPCC Helpline	Tel. 0800 800 5000 (24 hours)

## **Annex A – Guidance for College members carrying out activities involving adults at risk or children**

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

### **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 therefore should demonstrate exemplary behaviour.

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

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.

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.

### **Types of abuse**

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. They may be abused by an adult or adults or another child or children"

The same principles apply for at risk adults. Abuse can take many forms:

- |                                 |                                     |
|---------------------------------|-------------------------------------|
| • Physical abuse                | • Child criminal exploitation       |
| • Emotional/psychological abuse | • Domestic abuse                    |
| • Neglect or self-neglect       | • Controlling or coercive behaviour |
| • Sexual abuse                  | • Modern slavery                    |
| • Child sexual exploitation     | • Financial or material abuse       |



More information on types of abuse and thresholds for reporting concerns can be found here:

For children: Oxfordshire Safeguarding Children Board  
[www.oscb.org.uk/](http://www.oscb.org.uk/)

For adults at risk: Oxfordshire Safeguarding Adults Board  
[www.osab.co.uk/](http://www.osab.co.uk/)

## **Expectations of those working with adults at risk or children**

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 College](#);
- Deal with information sensitively.

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;

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- 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.

**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.

## **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 College'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.

## **Annex 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 College;
- 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 College who will come into contact with adults at risk and children; and
- engaging in training themselves.

## **Annex C – Under-18 Student Authorisation**

### **St Anne's College, Oxford**

#### **Under-18 Student Authorisation**

**Student's name:**

**Date of Birth:**

**Programme of  
Study:**

St Anne's College generally makes contracts with students who have reached the age of majority and so are able independently to enter into adult agreements. When a student is below that age, we need to outline some particular areas that must be agreed by the student and the parent/guardian for them to be able to study here.

#### **1. Duty of care**

The College recognises that anyone under the age of 18 is a child as a matter of law. The College has special duties to safeguard the welfare of a child particularly when the child is under 16. In the event there is a concern for welfare or disclosure of abuse relating to a child, the College acts in accordance with the Safeguarding Code of Practice.

The College has a Designated Safeguarding Lead and where appropriate Tutors and other peripheral staff may be asked to complete DBS checks in line with Safeguarding procedures.

#### **2. Level of care and support**

The college exercises its duty of care to all students and provides support to promote the education, safety and welfare of the undergraduate and graduate population. The college is not in a position to offer substantial extra care, support or surveillance to students under the age of majority. The College will not act *in loco parentis* (i.e. will not take to fulfil the duties normally undertaken by a parent/guardian).

In agreeing for a child to study here a parent/guardian accepts that they are willing for their child/ward to receive the same degree of care and attention that the College gives its adult students, and it is important that the parents/guardians make sure they understand the very adult environment that exists at a British University and that they understand the course that their child/ward will be pursuing and what is involved in this. If a parent/guardian wishes their child/ward to receive additional care,

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support or oversight, they must personally make arrangements and take responsibility for its provision.

### **3. Emergency contacts**

The parent/guardian must ensure that the College is supplied with emergency contact details and that these details are kept up to date. If the parents/guardians are not present in the UK, they should nominate a guardian in this country who will act for them if necessary. The parent/guardian must agree for the College to arrange in an emergency, medical care for their child/ward, until contact is made and the parent's/guardian's wishes ascertained.

### **4. Exclusions**

The underage student will not be able to enter College premises licensed for the supply of alcohol where the terms of that licence specify those present must be 18 or over. This may extend to events held in college where alcohol is served. The student may not hold any office in the College. It is the responsibility of the student to identify themselves as a minor when appropriate and to obey all instructions issued to them concerning such premises and such offices. The student must not buy alcoholic drinks on College premises or allow others to buy alcoholic drinks for them. Failure to abide by these rules might be treated as a breach of regulations and dealt with accordingly.

### **5. Contracts**

The parent must guarantee fulfilment of any contract the student enters into with the College and must undertake payment of all sums due under any such contract. Negotiation concerning contracts shall normally be undertaken with the student, and when they have agreed, the contract will be deemed to have been underwritten and guaranteed by the parent/guardian. Generally, the College shall deem the student as competent to understand all aspects of the normal College process, to obey the College regulations, to be disciplined under College procedures and shall not as a matter of routine make contact with the parent/guardian concerning any matter. However, the College will take action to recover debts from the parent/guardian if the student fails to pay them and will reveal necessary details to the parent/guardian if necessary to recover these debts.

### **6. Welfare**

We are confident that the College will be able to offer the student any guidance needed for normal situations. However, the College would like to

make sure that in the event of any emergency or problem, the student knows who to contact for help. Information on support with health, welfare and disability including emergency support can be found [here](#).

In the event that there is concern for the welfare of a student under 18, the college would also make contact with parents/guardians in accordance with the college's safeguarding code of practice.

## **7. Sharing information**

The information you provide is shared with key contacts (listed below) who are aware of the student's status as a minor and who we are confident can be trusted to act responsibly. They will treat anything told to them with discretion and sensitivity and will make addressing any difficulties the student is having, a matter of priority.

**The completed information will be processed by the Deputy Academic Registrar in accordance with our [Privacy Policy](#) and shared with the following key contacts:**

- Principal
- Senior Tutor and Tutor for Admissions
- Personal and Subject Tutors
- College Dean
- Dean of Welfare
- Domestic Bursar (disseminating to Catering Manager, Accommodation Manager, College Bar Manager, Lodge Manager)
- JCR Committee

## **8. Contact information**

Please do not hesitate to contact someone in college if you have any concerns:

### **For Academic matters:**

#### **Senior Tutor and Tutor for Admissions**

Dr Shannon McKellar. Tel. 01865 274858. Email: [shannon.mckellar@st-annes.ox.ac.uk](mailto:shannon.mckellar@st-annes.ox.ac.uk)

**Personal Tutor/Director of Studies for Programme of Study will be confirmed on your arrival**

### **For Welfare matters:**

**Dean of Welfare:** For any welfare concerns

Mrs Rachel Busby Tel: 01865 274884  
Email: [dean.welfare@st-annes.ox.ac.uk](mailto:dean.welfare@st-annes.ox.ac.uk)

**For Domestic matters:**

**College Dean:** For disciplinary, community and anti-social issues  
Dr Freya Johnston. Tel. 01865 284979.  
Email: [freya.johnston@st-annes.ox.ac.uk](mailto:freya.johnston@st-annes.ox.ac.uk)

**Domestic Bursar:** For any issues relating to site, events and accommodation  
Mr John Banbrook. Tel. 01865 274890.  
Email: [john.banbrook@st-annes.ox.ac.uk](mailto:john.banbrook@st-annes.ox.ac.uk)

**Lodge Manager:**  
Mr Peter Burden Tel. 01865 274 800  
Email: [peter.burden2@st-annes.ox.ac.uk](mailto:peter.burden2@st-annes.ox.ac.uk)

**This agreement remains in place until the student turns 18.**

**Please complete the authorisation form enclosed and return as directed.**



## **Under 18 - Student Authorisation Form**

Please complete and sign the form below and return to the Deputy Academic Registrar, Sheila Smith:

Address: St Anne's College, Oxford, OX2 6HS

Email: sheila.smith@st-annes.ox.ac.uk

I/we have read and understood the Under 18 authorisation document and agree to its terms including the sharing of information.

Student's name:

Date of Birth:

Programme of Study:

Parent/Guardian's home  
telephone number:

Parent/Guardian's email  
address:

Parent/Guardian's mobile  
telephone number:

Any additional contact information for example priority contact:

Parent/Guardian's Name:

Parent/Guardian's address:

Parent/Guardian's home  
telephone number:

Parent/Guardian's email  
address:

Parent/Guardian's mobile  
telephone number:

Parent contact details (please give as much extra information as is possible for emergency contacts):

Parent/guardian's  
signature:

Date:

Student's  
signature:

Date: