Aim

The College is committed to providing a safe environment for all adults ‘at risk’ and children. The College may encounter ‘at risk’/vulnerable adults 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 ‘at risk’/vulnerable adults and children, and to offer assurances to staff, students, volunteers and visitors that safeguarding will be dealt with effectively and in a timely manner.

The College has a designated Safeguarding Lead (the Domestic Bursar) and a designated Safeguarding Coordinator (the Senior Outreach and Admissions Officer) who will work with other agencies where appropriate to achieve its aims. A full breakdown of the responsibilities and contact details of the Safeguarding Coordinator and Safeguarding Lead can be found in Annex A.

This Code of Practice should be read in conjunction with other College and University of Oxford policies referred to within this Code of Practice, or listed below.

Policy and Summary

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 College outreach activity, this will usually be the Safeguarding Coordinator (the Outreach and Admissions Officer), with support from the Safeguarding Lead (the Domestic Bursar).

Activities run by the college 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.

Every activity run by the college 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 comply with 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.

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

Guidance on health and safety for young people can be found on the University Safety Office website: [www.admin.ox.ac.uk/safety/policy-statements/upss113/](http://www.admin.ox.ac.uk/safety/policy-statements/upss113/)

Any pre-employment or pre-activity checks should be carried out in accordance with the University’s guidance [www.admin.ox.ac.uk/personnel/recruit/preempcheck/](http://www.admin.ox.ac.uk/personnel/recruit/preempcheck/)

Adults at risk and children who are participating in a College activity must have access to 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 the Safeguarding Lead and the designated Safeguarding Coordinator for the activity should be given.

Activities run by external groups staying at the college (for example summer schools) are expected to have their own safeguarding leads and procedures, but should be explicitly informed prior to arrival that this is the College’s expectation. They should be provided with relevant local/university safeguarding contact details and/or the generic College visits Risk Assessment if requested.
Training, Administration and Staff Awareness

Any member of the College who will be planning activities with 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, as per the guidance below.

As of October 2017, the appropriate courses are as follows:

- For all members of College who come into contact with children in any sustained capacity as part of their work or activities: ‘An Introduction to Safeguarding’ e-training (Level 1), completed online and refreshed every 3 years.\(^4\)
  - This applies to the Senior Outreach and Admissions Officer, the Assistant Outreach Officer, Lodge staff, and may apply to other staff or students, such as Subject Ambassadors. It could also be considered to apply to Peer Supporters and Junior Deans/Wardens (in relation to under-age undergraduates) or to department heads (in relation to apprentices or interns).

- For the College’s Safeguarding Lead and Coordinator(s): the above training and ‘Generalist Safeguarding Training (Level 2), to be refreshed every 3 years.

- For those involved in regulated activity with children or young people (regulated activity is defined as regular unsupervised contact with children i.e. 3 or more times in a 30-day period): additional training should be provided by a member of staff who has undergone the above training and ‘Generalist safeguarding training’ (Level 2), i.e. the Safeguarding Lead or Coordinator.
  - Those who may undergo this training may be, for example, Science Residential student mentors and ambassadors during the Interview Period.

Activity organisers may wish to arrange additional training as and when they or their supervisors feel it is appropriate.

Training should be recorded and monitored by the Safeguarding Coordinator.

Catering staff and scouts, due to the nature of their roles, are not expected to undergo training as their contact with adults at risk or children does not extend to running activities or sustained/significant levels of engagement.

Administration (DBS Checks) and Awareness

The Senior Outreach Officer and Assistant Outreach Officer are frequently involved in Regulated Activity of a specified nature with children, including at times responsibility for their supervision. The Senior Outreach Officer and Assistant Outreach Officer should therefore always have an enhanced DBS check.\(^5\)

Where students are attending an event where at least one teacher/staff member from their organisation is present, the teacher(s)/staff are informed prior to the event that they have primary safeguarding responsibility. This statement will be used for school groups and Conferences bookings alike, where applicable.

Where students are staying overnight unsupervised by school or external organisation staff, i.e. during residential stays (9th week Hilary and Trinity) or the Interview Period, Conference bookings will not be taken. The College accepts that there is a possibility undergraduates granted vacation residence may still be in accommodation buildings. The College will ensure:

- The parent(s)/guardian(s) have been notified that their child is not under direct supervision at all times and that there is a possibility of undergraduate students being accommodated in the same building
- Undergraduate students still in residence will be notified that underage students are residing within the College
- There is a male and female DBS checked member of staff working the event staying overnight (Site Managers). These will be Subject Ambassadors employed by the College to work on the event.
- Participants attending the event will be informed who the Site Managers are and how they can contact them

\(^1\) 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.

\(^3\) Activity includes any event organised by, or hosted at, the College, both in-person and ‘virtual’ or online.

\(^4\) An Introduction to Safeguarding: http://training.oscb.org.uk/elearning-list

\(^5\) See https://hr.admin.ox.ac.uk/dbs-checks#colapse1511141, Regulated Activity, Point 1 (Activity of a Specified Nature).
if there is an issue overnight. The Site Managers will undergo additional safeguarding training to ensure they know how to respond correctly to any overnight issues.

Where possible, when children or adults at risk are staying in College accommodation for residential visits or events, Scouts should aim to clean rooms while the children/adults at risk are not present in the room. If this is unavoidable, scouts must ensure the door is kept open at all times whilst they are in the room. If maintenance staff are required to attend to the room, maintenance staff must ensure they are in pairs and the door is kept open at all times.

**Procedure for under 18 undergraduate students**

In terms of safeguarding, there is a difference between an under 18 student attending an event in College and an under 18 student attending the College as an undergraduate, due to the vastly increased level of sustained interaction with the latter, the difference in their status and the College’s responsibility towards them. A separate guidance document has been produced for such students and an individual risk assessment should be produced for each under 18 undergraduate student before they arrive in College. The relevant documentation (Guidance Document and Consent Forms, Individual Risk Assessment Template, Admissions Policy) can be found on [https://www.ccc.ox.ac.uk/about-corpus/governance/policies-and-guidance-0](https://www.ccc.ox.ac.uk/about-corpus/governance/policies-and-guidance-0).

**Prevent**

Corpus Christi College has a statutory duty to have due regard to the need to prevent people being drawn into terrorism. Prevent is about supporting and protecting people who might be susceptible to being drawn into terrorism. Our Safeguarding responsibilities in this area apply particularly to any under 18 or adult studying at the College who for whatever reason may be vulnerable to, or at risk of, being drawn into terrorism. Prevent is considered by the College as a form of safeguarding since it aims to stop and safeguard against vulnerable people being radicalised.

Corpus Christi College is committed to implementing practices to meet requirements under “Prevent Duty”. The College is also committed to ensuring that freedom of speech within the law is secured for members of the University and visiting speakers. However, preventing terrorism will mean challenging extremist (and non-violent) ideas that may lead to people moving from extremist groups or from extremism into terrorist-related activity.

The collegiate nature of the university and tutorial teaching system allow for a significantly higher than average quantity of staff contact time with students, compared to other HE institutions. Staff are therefore in a stronger position to notice a change in behaviour in a student. If a staff member is concerned about a student or have noticed a change in their behaviour, or if a student has said something to give cause for concern, it is the responsibility of that staff member to share their concerns with our Dean of Welfare, in accordance with our welfare procedures.

Most welfare concerns raised are not Prevent related and the student(s) in question will then be monitored and supported following the College’s well-established welfare procedures. If it seems appropriate to respond to a concern in relation to Prevent, the College Welfare team will investigate internally through dialogue with colleagues in the College and University to build a clear picture. If the concern appears Prevent related, the Dean of Welfare or Prevent Lead will contact the University’s Prevent Lead and will discuss the most appropriate and supportive actions.

**Safeguarding Concerns and Reporting**

**Reporting Safeguarding Concerns – Events**

Any member of staff working on, or present at, an event with under 18s is responsible for reporting any behaviour, incident or conversation that gives them cause for concern for the welfare of a child or children attending that event, to a member of Safeguarding staff, as soon as possible and ideally before the child has left the College. A publicly displayed advice sheet will be available in the Lodge and other prominent sites in College to ensure all staff are aware of how to proceed if they are concerned for the welfare of a child.

Any Safeguarding Concerns (whether incident, observation or disclosure) should be recorded in the online Safeguarding Report Log as soon as possible after the incident, observation or disclosure. This record should include as detailed, accurate and objective a report as possible. The Safeguarding Lead and Coordinator should both be able to access the Safeguarding Report Log.

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Dealing with suspicions or allegations of abuse

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.

Whilst these issues may require very different courses of action, 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, usually the Safeguarding Coordinator. The Safeguarding Coordinator is 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.

Any allegations or suspicions of abuse must be reported without delay to the nominated safeguarding contact for the activity, who is responsible for ensuring that concerns and allegations are escalated to the appropriate senior members of the College and to the University Safeguarding Officers, if appropriate, without delay. Allegations against or abuse involving a Fellow or member of staff or student should be reported directly to the Safeguarding Lead and may also need to be reported to the Harassment Advisors, who may provide support during any investigation.

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. The Lead will assess and, where appropriate, contact the relevant statutory agency for advice.

- In the event that an allegation is made against College Fellows, 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.

- 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 Coordinator and designated safeguarding lead for the particular activity should then be notified of the case.

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.)

Appropriate records will be retained in accordance with the College’s above stated reporting guidelines and with the University’s Data Protection Policies. Where the matter may relate to both Fellows/staff and students, the Safeguarding Coordinator will agree on where the file will be kept.

Useful links

External agencies

- Oxfordshire Multi-Agency Safeguarding Hub
- For children: Oxfordshire Safeguarding Children Board
- For at risk adults: Oxfordshire Safe from Harm
- Prevent: Revised Prevent Duty Guidance, April 2021

University of Oxford policy statements and codes of practice
A list of the University’s key policies can be found at: https://governance.admin.ox.ac.uk/policies. The following are of particular relevance:

- 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

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Annex A: Roles of the Safeguarding Officer and Safeguarding Lead

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

The role of the Safeguarding Coordinator (Senior Outreach and Admissions Officer, admissions.office@ccc.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.

3. To promote appropriate training by:
   - maintaining records of training undertaken by members of the College who will come into contact with adults at risk and children;
   - providing briefings and guidance to other College members, as necessary,
   - engaging in training themselves
   - undertake an enhanced criminal record check from the Disclosure and Barring Service

The role of the Safeguarding Lead (Domestic Bursar, Andrew Rolfe, andrew.rolfe@ccc.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: Safeguarding Procedure Flow-Chart

Safeguarding Children and Adults at Risk

Key Information for Corpus Christi College 2019
College Safeguarding Lead: Domestic Bursar, Andrew Rolfe, 01865 276710
College Safeguarding Co-ordinator: Senior Outreach Officer, Emma Gregory, 01865 276693

FLOW-CHART FOR REPORTING SAFEGUARDING INCIDENTS, DISCLOSURES AND CONCERNS:

I have seen, heard or been told something that gives me cause for concern for the welfare and/or wellbeing of a child or adult at risk attending an event in College

I might have seen, heard or been told something that gives me cause for concern for the welfare and/or wellbeing of a child or adult at risk attending an event in College – but I’m not sure

Report your concern or possible concern to the Safeguarding Coordinator or Safeguarding Lead as soon as possible and ideally before the child or adult at risk has left the College/the event has ended

I am aware of an allegation of abuse towards a child or adult at risk, made against a Fellow, student or staff member of the College, or an academic visitor, volunteer or guest to the College; or been accused myself

I have seen, heard or been told something that suggests a risk of immediate serious harm to a child or adult at risk

Report the allegation to the Safeguarding Lead as soon as possible and ideally before the child or adult at risk has left the College/the event has ended.

Emergency services should be contacted via 999 or the police via the 101 service. The Safeguarding Coordinator or Lead should then be notified.

What happens after I report a concern, incident or disclosure?
You may need to write a formal account of the concern/incident, in which event you would be supported by the Safeguarding Coordinator / Safeguarding Lead. If external agencies need to be contacted, the Safeguarding Coordinator / Lead will be responsible for this.

How can I access university policy statements and codes of practice in relation to Safeguarding?
A list of the University’s key policies can be found at: http://www.admin.ox.ac.uk/iso/statutes/