



**Somerville College, Oxford**



## **1. Introduction**

**1.1** Somerville College is committed to safeguarding and promoting the health, safety and welfare of its Members and visitors. The College recognises it is likely that children will enter College premises or interact with College Members in a number of circumstances.

**1.2** This Policy places the welfare of children to be of paramount importance and aims to safeguard their well-being, in particular by protecting them from abuse of any kind. This Policy has been produced in response to an increase in the College's provision of outreach activity for schools and should be read in conjunction with the University of Oxford Safeguarding Code of Practice –

<http://www.admin.ox.ac.uk/personnel/cops/safeguarding/safeguardingcop/>.

**1.3** A copy of this Policy is available on the College website.

## **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 2004*).

**2.2** For the purposes of the policy, references to children apply also to at-risk adults. The term 'at-risk adults' refers to 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. Definition copied from the University of Oxford Safeguarding Code of Practice –

<http://www.admin.ox.ac.uk/personnel/cops/safeguarding/safeguardingcop/>. The protection of adults who are not deemed to be at risk (but who should still not be exploited or harassed through interaction with college members) is covered by the College's policy on harassment.

**2.3** For the purposes of this policy, a College Member is anyone at Somerville College, working with children or at-risk adults whether as a fellow, employee, student or volunteer.

**2.4** This Policy applies to all activities involving children and/or at risk adults and to all College Members.

**2.5** 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 *Children Acts 1989 and 2004*, and the *Health and Safety at Work etc Act 1974*.

**2.6** Where a College Member occupies a position of trust with regard to children or at-risk adults, an improper relationship with a child constitutes an abuse of trust under the *Sexual Offences Act 2003*.

**2.7** The College also has certain powers, under the *Rehabilitation of Offenders Act 1974*, to enquire as to the criminal records history of Members to assess any risk to children or at-risk adults.

### **3. Preventative Measures**

**3.1** The College's Lead Safeguarding Officer (LSO) is The Senior Tutor. The College's Designated Safeguarding Officer (DSO) will depend on the specific event but in most cases will be the Access and Outreach Officer or Access and Outreach Support Officer. Contact details can be found in section **13** of this Policy. The LSO and DSO have both completed a DBS Disclosure.

**3.2** The Safeguarding Officers are responsible for:

- > Implementing and promoting this Policy;
- > Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and at-risk adults;
- > Acting as the main contacts within the College for the protection of children and at-risk adults;
- > Ensuring that appropriate College Members are provided with information, advice and training on the protection of children and at-risk adults;
- > Establishing and maintaining contacts with the local Children's and adults' Social Care Services departments and Police;
- > Maintaining confidential records of reported child abuse cases and cases of abuse or exploitation of adults at risk and action taken.

**3.3** Where a role may require College Members to have sole contact with, regularly care for, train, supervise or be in sole charge of children or at-risk adults, the College will require satisfactory completion of a Disclosure and Barring Service (DBS) Disclosure at the appropriate level. It is not anticipated that this will require Fellows to be DBS

checked under normal circumstances but any Fellow that wishes to undertake a check, for instance so that they can work more freely with schools, will be supported by the College to undertake the check and the College will pay any required fees.

**3.4** New College Members will receive a copy of this Policy as part of the induction process. All College Members are expected to comply fully with the guidance and procedures set out in this Policy. The College will ensure that Members are fully briefed and/or trained (as appropriate) on the implications of this Policy.

**3.5** This Policy is reviewed on an annual basis.

## **4. Forms of Abuse**

**4.1** The UK Government guidance, *Working Together to Safeguard Children 2017 (Appendix A)*, defines four types of child abuse:

**4.2** Physical – the physical hurting or injuring of a child.

**4.3** Emotional – the persistent emotional maltreatment of a child which results in severe or persistent adverse effects. Emotional abuse is often present in other categories of abuse, although it may occur independently.

**4.4** Sexual – the forcing or enticing of a child to take part in sexual activities. The activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-contact activities such as involving children looking at, or in the production of, pornographic material. Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity.

**4.5** Neglect – the persistent failure to meet a child's basic needs, likely to result in the serious impairment of the child's health or development. Neglect can include failure to provide the following: adequate food, clothing and shelter; protection from physical and emotional harm or danger; adequate supervision; access to appropriate medical care or treatment.

## **5. Recognising Abuse**

**5.1** Child abuse can and does occur both within a child's family and in institutional or community settings. The following may indicate that a child or at-risk adult is being or has been abused:

- > Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
  - > An injury for which the child's or adult's explanation appears inconsistent;
  - > The child or at-risk adult describes an abusive act or situation;
  - > Unexplained changes in behaviour;
  - > Inappropriate sexual awareness or sexually explicit behaviour;
  - > The child appears distrustful of adults;
  - > The child is not allowed to be involved in normal social activities;
  - > The child becomes increasingly dirty or shabby.

**5.2** It is the responsibility of all College Members to act on concerns in order to safeguard the welfare of the child.

## **6. Dealing with suspicion of abuse/allegations of abuse**

**6.1** College Members should address any concerns to the DSO. If those concerns relate to the DSO, College Members are expected to discuss the matter with the LSO or to contact Oxfordshire Social Services Department directly. If an individual feels that the DSO or LSO has not responded appropriately, then they are encouraged to contact Social Services without delay. Every effort should be made to maintain confidentiality. Suspicions or allegations of abuse must not be discussed with anyone else other than those named in **3.1**.

**6.2** It is the Officer's responsibility to act on behalf of the College in dealing with allegations or suspicion of abuse. It is the task of Social Services, not the College, to investigate the matter, under *Section 47 of the Children Act 1989*. Under no circumstances should a College Member conduct their own investigation into suspicions or allegations of abuse, neither should they question children closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services.

**6.3** If a child says something or acts in such a way that abuse is suspected, the person receiving the information should:

- > React in a calm but concerned way;
- > Tell the child that s/he is right to share what has happened, and that s/he is not responsible for what has happened;
- > Find an early opportunity to explain that it is likely that the information will need to be shared;
- > Take what the child says seriously and allow the child to continue at his/her own pace;
- > Keep questions to an absolute minimum (only clarify what the child is saying) and not ask a question that suggests a particular answer;

- > Not interrupt the child when they are recalling significant events;
- > Reassure the child that the problem can be dealt with;
- > Tell the child what will happen next and with whom the information will be shared;
- > Do not promise to keep secrets;
- > Make a full record of what is said and done, though this should not result in a delay in reporting the problem.

**6.4** The record should include:

- > The child's account of what has occurred;
- > Any dates, times or places and any other potentially useful information;
- > The nature of the allegation or concern;
- > A description of any visible physical injury (clothing should not be removed to inspect the child).

**6.5** The record may be used later in a criminal trial and it is vital that what the child discloses is recorded as accurately as possible. The record must be drafted in the child's words and should not include the assumptions or opinions of others.

**6.6** The problem should be reported **immediately** to the DSO who will take the appropriate action. If the concern arises out of normal office hours (evenings and weekends) contact should be made with the Social Services Emergency Duty Team on 0800 833408. Advice can also be sought from the NSPCC 24 hour helpline on 0808 800 5000 or from the local police by dialing 101. In an emergency, dial 999.

**6.7** It is recognised that College Members may need support after receiving a disclosure from a child and appropriate support will be offered by the College.

**6.8** All College Members (including those with obligations to particular codes of conduct/professional ethics that may be thought to constrain their actions) are required to report or act on any disclosures or allegations of abuse that involve a College Member and that have taken place at the College or on College business. College Members do not investigate serious allegations of child abuse themselves as serious allegations will be reported to Oxfordshire Social Services and, if necessary, the police.

## **7. Procedure for dealing with allegations or suspicions about a College Member**

**7.1** It can be difficult to accept that a colleague may deliberately harm a child. When a concern arises, there are three processes that may need to take place:

- > A child protection investigation;
- > A criminal investigation;
- > Action by the College/University to discipline or remove the Member.

**7.2** Any suspicions or allegations should be addressed to the DSO, as outlined in **6.1** above, who will inform the Local Area Designated Officer (LADO) at the Oxfordshire Safeguarding Children Board. The advice of the LADO will be followed appropriately.

## **8. Candidates for admissions interviews**

**8.1** Candidates for admission to Somerville 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. Those that are over 18 are still potentially susceptible to abuse or exploitation due to an imbalance of power between them and college members. Whilst there are strong legal requirements specific to the safeguarding of children, the same principles should apply to those over 18 attending for interview.

**8.2** 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.
- 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.

## **9. Students under the age of 18**

**9.1** 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*, except in the case of a medical emergency where written permission has been previously obtained from the parent or guardian of the child.

**9.2** The Senior Tutor is responsible for ensuring that the College DSO, LSO and relevant tutors are informed of the admission of any students under the age of 18.

**9.3** The Senior Tutor is responsible for ensuring that the hall, bar and lodge have the names of any students under the age of 18.

**9.4** The Senior Tutor is responsible for gaining written agreement from parents and

students under the age of 18 that they accept the provisions put in place.

## **10. Confidentiality**

**10.1** The College has an obligation to respect the privacy and confidentiality of all individuals. Nevertheless, it is not always appropriate or sensible to promise complete confidentiality to informants in circumstances of alleged abuse. In some circumstances the College owes a duty of care to its students or visitors that cannot be fulfilled unless the College takes action on the basis of information that might have been provided in confidence. Anyone making an allegation of abuse should be assured that:

- (i) The adult will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken.
- (ii) The adult will never tell anyone who does not have a clear 'need to know'.
- (iii) The adult will take whatever steps they can to protect the informing child or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

**10.2** There will be circumstances in which it is necessary for a Safeguarding Officer or other College Member to share information with third parties such as the local authority, the police or the child's parents or guardians.

## **11. Conduct around children**

**11.1** College Members should remember that inappropriate behaviour can occur via the telephone, internet and e-mail, as well as during direct interaction with children.

**11.2** Conduct to be avoided:

- > Spending excessive amounts of time alone with children, away from others;
- > Taking children to your home;
- > Being alone in a vehicle with children.

**11.3** Conduct never to be sanctioned:

- > Engaging in rough, physical or sexually provocative games;
- > Giving children inappropriate drugs or other inappropriate substances, including alcohol (please note that one of the four key objectives of the *Licensing Act 2003* is the 'protection of children from harm' and that it is also an offence for a child to be supplied with or knowingly to consume alcohol on a licensed premises). Members should be aware that the College holds a Premises Licence;
- > Allowing or engaging in any form of inappropriate touching;
- > Making sexually suggestive comments to children, even in jest;

- > Allowing allegations made by a child to go unreported;
- > Doing things of an intimate nature for children that they can do for themselves.

#### 11.4 College Members should:

- > Treat everyone with fairness, equality and respect;
- > Be sensitive to children's appearance, race, culture, religious belief, sexuality, gender or disability;
- > Act as a good role model and challenge any unacceptable behaviour from children or from other College Members;
- > Report all allegations or suspicions of child abuse using the Procedures outlined in this Policy;
- > Consider whether contact with an individual child should involve a colleague's being present;
- > Be aware that physical contact with a child may be misinterpreted;
- > Retain a professional approach to children, including avoiding physical contact with a child;
- > Respect a child's right to privacy and, in residential accommodation, not enter a child's bedroom without prior authorisation except in the case of an emergency.

**11.5** The *Sexual Offences Act 2003* provides that intimate contact between an adult and a child, where that adult was in a 'position of trust' to the child is a criminal offence. Those in a 'position of trust' include those who have regular unsupervised contact with a child, or where an adult looks after a child at an educational institution at which the adult is not also receiving education.

**11.6** It may be necessary for College Members to take photographs or make videos of children for educational research, teaching purposes, or publication. An image of a child is personal data for the purposes of the *Data Protection Act 2008*. Where images are stored in a way that makes the data subject identifiable, or where the images are used for publication (online and print), written consent should be obtained **before the images are created**. If the data subject is capable of comprehending the implications of consenting to the data use, then their consent should be sought; otherwise, the consent of the parent or legal guardian should be obtained. Whenever an image of a child or vulnerable adult is published, the data subject should, as far as is practicable, be unidentifiable.

## 12. Risk Assessment

**12.1** A risk assessment must be completed by the organisers of any activity specifically intended for children and which brings children onto College premises or into contact with College Members. Once completed, the risk assessment must be approved by a



Safeguarding Officer before the activity is undertaken.

**12.2** It is expected that for visits by schools where members of staff of that school are in attendance, the school will complete its own risk assessment and take its own child protection steps in accordance with local education authority guidelines.

### **13. People with Specific Responsibility for Child Protection and their**

#### **Roles 13.1 The designated staff are responsible for:**

- a) Procedure**
  - i) Holding and being conversant with current local and national Child Protection procedures.
  - ii) Keeping up to date through training. It is a requirement that this takes place at least every two years.
  - iii) Reviewing and updating the College's Safeguarding and Child Protection Policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without delay.
  - iv) Liaison over safeguarding matters with the local Social Services Department.
- b) Raising Awareness.**
- c) Briefing and guiding those in regular contact with children in College on Safeguarding matters. This includes the briefing of new staff as part of their induction.**
- d) Keeping close contact with all staff and maintaining awareness of Safeguarding and the need to raise any concerns immediately with the LSO.**
- e) Ensuring that the Safeguarding procedures are followed within the College, that each Member has access to the procedures and has an understanding of them.**
- f) The Safeguarding procedures must be available to parents and teachers of children working with the College on request.**

#### **13.2 Referrals**

Receiving reports of alleged or suspected child abuse within the College, or reported by a child relating to incidents at home or outside the College, contacting the Social Services Department and taking any other action in response, as set out below:

- > Keeping records
- > Liaising with the staff
- > Liaising with the LSO

#### **13.3 The Governing Body is responsible for undertaking an annual review of:**

- > The College's Safeguarding policy and procedures.
- > The efficiency with which the related duties have been discharged.

**13.5** The LSO will undertake training in Safer Recruitment and Child Protection.

**13.6 Training:**

In addition to annual update Child Protection briefings to all Members, student helpers are to be trained annually.

**14. Contact Information**

**14.1** Lead Safeguarding Officer                      Dr Stephen Rayner  
Tel 07941803303

**14.2** Designated Safeguarding Officers   Ms Hannah Pack  
(Access and Outreach Officer)  
Tel 07966481994 (Access mobile number)

Ms Nuala Marshall  
(Access and Outreach Support Officer)  
Tel 07966481994 (Access mobile number)

**14.3** Oxfordshire Multi-Agency Safeguarding Hub (MASH) 0345 0507666 (office hours)  
0800 833408 (out of hours)  
<https://www2.oxfordshire.gov.uk/cms/node/154149>

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

Local Authority Designated Officer (LADO)  
[LADO.safeguardingchildren@oxfordshire.gov.uk](mailto:LADO.safeguardingchildren@oxfordshire.gov.uk)  
Tel. 01865 810603

**14.5** Oxfordshire Safeguarding Adults Board ([www.osab.org.uk](http://www.osab.org.uk))  
Tel. 01865 328232

**14.5** Police Kingfisher (Child Sexual Exploitation) Team Tel. 01865 309196

**14.6** NSPCC Helpline                                      Tel. 0808 800 5000 (24 hours)

Dr Stephen Rayner

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