

Policy

1. Introduction

1.1 Regent's Park 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 and at-risk adults will enter College premises or interact with College Members in a number of circumstances.

1.2 This Policy recognises the welfare of children and at-risk adults to be of paramount importance and aims to safeguard their well-being, in particular by protecting them from abuse of any kind. This Policy should be read in conjunction with the University of Oxford [Safeguarding Code of Practice](#)

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

1.4 This Policy should be read in association with other College governance policies, such as the [Harassment and Bullying](#) policy and the [Staff-Student Relationships](#) policy.

2. Key Definitions

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 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 themselves, or unable to protect themselves against significant harm or exploitation (definition taken from the University of Oxford [Safeguarding Code of Practice](#)). 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 and Bullying](#).

3. Scope

3.1 For the purposes of this policy, a College Member is anyone at Regent's Park College, whether a Trustee, Fellow, employee, student or volunteer.

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

3.3 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 Act 1989](#) and the [Children Act 2004](#), and the [Health and Safety at Work etc Act 1974](#). The College recognises that it has a duty of care to report to Social Services any concerns about the welfare of any child/children or at-risk adults reported to them.

3.4 Where a College Member occupies a position of trust with regard to children or at-

risk adults, an improper relationship with a child or at-risk adult constitutes an abuse of trust under the [Sexual Offences Act 2003](#).

3.5 For ministerial students and Baptist Union of Great Britain ministers please see Section 7.

4. Safeguarding Officers and Trustee

4.1 The College's Lead Safeguarding Officer (LSO) is the Fellow for Welfare. The College will appoint two further Designated Safeguarding Officers (DSOs), one of whom will be the Director of Ministerial Formation. Contact details can be found in Annexe B to this Policy, and will be kept up to date. The LSO and DSOs will all have completed the appropriate DBS Disclosures to the level required for their role. The LSO will undergo Level 3 safeguarding training every 2 years. The DSOs will undergo Level 2 Safeguarding Training every 3 years. The Director of Ministerial Formation will undergo the Baptist Union's Safeguarding training every 3 years. Records of this will be kept on file by the HR Manager.

4.2 The College will appoint a member of Governing Body to be a Safeguarding Trustee, who will ensure an effective oversight of the policies and procedures by:

- ensuring that the College has appropriate policies and procedures;
- ensuring that Governing Body receives a report each year on safeguarding issues; and
- liaising with College staff to ensure that any issues identified are dealt with appropriately.

This member of Governing Body cannot be an employee of the College.

5. Roles and Responsibilities

5.1 The **Lead Safeguarding Officer** is 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 contact within the College for the protection of children and at-risk adults;
- ensuring that College Members are provided with appropriate 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; and
- maintaining confidential records of reported child abuse cases and cases of abuse or exploitation of at-risk adults and action taken.

5.2 The **Designated Safeguarding Officer for Ministerial Formation**, normally the Director of Ministerial Formation, will be responsible for reporting incidents to the Baptist Union, as outlined in Section 7 of the Policy.

5.3 The other **Designated Safeguarding Officers** will receive any disclosures, and work with the LSO in accurately recording any concerns. They also help write and implement any safeguarding risk assessments. They are also there for the eventuality that a concern is raised about the LSO.

5.4 The **Safeguarding Trustee** will be responsible for having a governance overview, ensuring that the safeguarding policies are up to date and offering any external review required.

5.5 **College Members:** where a role may require College Members to have sole contact with, regularly care for, train, supervise or be in sole charge of children under 18 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.

5.6 **New Staff Members** will receive a copy of this Policy as part of the induction process. All Staff Members are expected to comply fully with the guidance and procedures set out in this Policy.

5.7 Induction of **new students** will include signposting to the Safeguarding Policy.

5.8 This Policy is reviewed every two years by the Risk and Regulatory Compliance Committee of Governing Body in consultation with the Safeguarding Officers.

6. Confidentiality

6.1 The College has an obligation to respect the privacy and confidentiality of all individuals. Nevertheless, it is not 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 relevant College officer 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; and
- (ii) the College officer will never tell anyone who does not have a clear 'need to know'.

6.2 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.

7. Baptist Union of Great Britain ministers and ministerial students

7.1 It is not expected that this policy routinely covers ministerial practice outside of the immediate College context, which is the responsibility of churches and their associations.

7.2 However, where a Baptist Union of Great Britain (BUGB) ministerial student discloses safeguarding information to a member of the Pastoral Team, or safeguarding information is disclosed about a BUGB ministerial student or Staff Member, the DSO for Ministerial Formation (normally the Director of Ministerial Formation) will inform the College LSO and, having liaised with them, will take responsibility for reporting this to the Safeguarding Lead for BUGB and the ministerial student or Staff Member's Regional Minister. Further information on Safeguarding in the Baptist Union can be found at <https://www.baptist.org.uk/Groups/220183/Safeguarding.aspx>. Were a safeguarding concern to be raised against the Director of Ministerial Formation, the LSO would inform BUGB.

7.3 The College will cooperate and work alongside the Union and associations in any safeguarding allegations or suspicions.

8. Students under the age of 18

8.1 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; and
- 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.

8.2 The Academic Office is responsible for ensuring that the College DSOs, LSO and relevant tutors are informed of the admission of any students under the age of 18.

8.3 The Academic Office is responsible for ensuring that the Hall, bar, Lodge and Junior Deans have the names of any students under the age of 18.

8.4 The Lead Safeguarding Officer is responsible for drafting the risk assessment and meeting any students under the age of 18 to brief them on the appropriate procedures for disclosing any concerns they may have.

8.5 The Lead Safeguarding Officer is responsible for gaining written agreement from parents and students under the age of 18 that they accept the provisions put in place.

8.6 The Tutor for Admissions, with the support of the Academic Office and the Safeguarding Officers as required, is to ensure that undergraduate admissions and College Open Days or other events for prospective students are appropriately risk assessed.

Procedures

1. Responding to suspicion of abuse/allegations of abuse

1.1 College Members must address any concerns to the relevant DSO who will then liaise with the LSO.

If those concerns relate to the DSO, College Members must discuss the matter with the LSO.

If an individual feels that the LSO has not responded appropriately, then they are encouraged to contact University Safeguarding without delay. Confidentiality shall be maintained as set out in paragraph 6 of the Policy.

1.2 It is the LSO'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 or at-risk adults closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services.

2. Receiving a disclosure of abuse from a child or adult at risk

2.1 If a child or adult at risk 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 or adult at risk that they are right to share what has happened, and that they are 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 or adult at risk says seriously and allow them to continue at their own pace;
- keep questions to an absolute minimum (only clarify what the child or adult at risk is saying) and not ask a question that suggests a particular answer;
- not interrupt the child or adult at risk when they are recalling significant events;
- reassure the child or adult at risk that the problem can be dealt with;
- tell the child or adult at risk what will happen next and with whom the information will be shared;
- not promise to keep secrets; and
- make a full record of what is said and done, though this should not result in a delay in reporting the problem.

2.2 The record should include:

- the child or at-risk adult's account of what has occurred;

- any dates, times or places and any other potentially useful information;
- the nature of the allegation or concern; and
- a description of any visible physical injury (NB clothing should not be removed to inspect the child or adult at risk).

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

2.4 The concern should be reported immediately to the LSO who will take the appropriate action within 24 hours.

2.5 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.

2.6 It is recognised that College Members may need support after receiving a disclosure from a child or adult at risk and appropriate support will be offered by the College.

2.7 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.

3. Conduct around children and at-risk adults

3.1 College Members should remember that inappropriate behaviour can occur via the telephone, internet and e-mail, as well as during direct interaction with children or at-risk adults.

3.2 Conduct to be avoided:

- spending any significant time alone with children or at-risk adults, away from others;
- taking children or at-risk adults to your home;
- being alone in a vehicle with children or at-risk adults;
- giving personal gifts to children or at-risk adults;
- friendships conducted via social media and/or text messaging.

3.3 Conduct **never** to be sanctioned:

- engaging in rough, physical or sexually provocative games;
- giving children or at-risk adults 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

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 or at-risk adults, even in jest;
- allowing allegations made by a child or an at-risk adult to go unreported; and
- doing things of an intimate nature for children or at-risk adults that they can do for themselves.

3.4 College Members should:

- treat everyone with fairness, equality and respect;
- be sensitive to children's and at-risk adults' appearance, race, culture, religious belief, sexuality, gender or disability;
- act as a good role model and challenge any unacceptable behaviour;
- report all allegations or suspicions of abuse using the Procedures outlined in this Policy;
- be aware that physical contact with a child or adult at risk may be misinterpreted;
- retain a professional approach to children and at-risk adults, including avoiding physical contact with them; and
- respect an at-risk adult's and a child's right to privacy and, in residential accommodation, not enter their bedroom without prior notice except in the case of an emergency.

3.5 Adults in a position of responsibility (see 3.7 below) should avoid being alone with anyone who is under 18, unless the College Member is DBS checked. Even if the adult is DBS checked, consider whether contact with an individual child should involve a colleague being present.

3.6 Students should be made aware as part of their induction process that some of the cohort are under 18, and that they may be in contact with at-risk adults, and should be advised of good practice.

3.7 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.

4. Photographs and videos

It may be necessary for College Members to take photographs or make videos of children or at-risk adults for educational research, teaching purposes, or publication. An image of a child or an at-risk adult is personal data for the purposes of the [Data Protection Act 2018](#). 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 adult at risk is published, the data subject should, as far as is practicable, be unidentifiable.

5. Risk Assessment

5.1 A risk assessment must be completed by the organisers of any activity specifically intended for children and at-risk adults and which brings children and at-risk adults 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.

5.2 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. However we will also have a pro-forma risk assessment for school visits.

5.3 Student helpers will be given annual safeguarding training.

6. Admissions interviews

6.1 Admissions interviews are held on Teams. 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. Candidates for admission to Regent's Park are invited to join an online call where two interviewers will be present throughout.

6.2 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 the following.

- All student helpers are appropriately trained and given specific information about how to respond to reports of abuse.
- All interviewers are required to undertake online safeguarding training.
- There will always be two interviewers present throughout online interviews. If for some reason one interviewer has not arrived yet, interviewers are required to notify the admissions team immediately so that one of them can join the call if required.
- The online student Q&A session for prospective applicants is managed by the Academic Office. Those joining are anonymised and cannot be seen on screen. Questions raised in the chat are also anonymised.

7. Interactions online with under 18 children or at-risk adults

7.1 The key principle for the delivery of live interactive events is that College Members should not conduct sessions on their own. For virtual study day taster sessions, a DBS checked Access Officer will always be present to host the call throughout, including the interactive Q&A that follows. Safeguarding information is provided to attendees, including who to contact if they have any safeguarding concerns.

7.2 Attendees are given a unique user ID to join the call with, which allows them to be registered, whilst protecting their privacy by not disclosing their full name to other attendees on the call.

8. Employing staff who are under 18

8.1 Where the College employs or otherwise engages children (under the age of 18) or at-risk adults, it will ensure that appropriate instruction, training, supervision, and support are provided, proportionate to the nature of their role and level of risk.

8.2 The Human Resources Manager is responsible for ensuring that the Director of Operations is informed of any children and young people or at-risk adults currently employed or engaged by the College.

8.3 The Human Resources Manager is responsible for ensuring that suitable and sufficient risk assessments are undertaken in relation to the employment or engagement of children and at-risk adults. Risk assessments will be reviewed and updated as required, including where there are changes to roles, activities, or working arrangements.

8.4 Line Managers are responsible for ensuring that a thorough induction is completed for any employee or worker who is a child or adult at risk, or who will work with such individuals. This induction will include:

- familiarisation with the College's Safeguarding Policy and procedures; and
- clear guidance on how to recognise and report safeguarding concerns.

8.5 Staff who regularly work with, or undertake sole working with, children or at-risk adults will be subject to appropriate Disclosure and Barring Service (DBS) checks, in accordance with legal requirements and the College's DBS policy.

8.6 All staff who regularly work with children or at-risk adults will receive Safeguarding Awareness training. Additional or specialist training will be provided where identified as necessary through risk assessment, role requirements, or changes in legislation or guidance.

Annexe A Recognising Abuse

1. Forms of Abuse

The UK Government guidance, [Working Together to Safeguard Children 2017 \(Appendix A\)](#), defines four types of child abuse:

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

For at-risk adults [‘The Care and support statutory guidance’](#) identifies ten types of abuse, these are:

- physical abuse
- domestic violence or abuse
- sexual abuse
- psychological or emotional abuse
- financial or material abuse
- modern slavery
- discriminatory abuse
- organisational or institutional abuse
- neglect or acts of omission
- self-neglect

Annexe B Contact details

Lead Safeguarding Officer:

Rev'd Beth Allison-Glenny

elizabeth.allisonglenny@regents.ox.ac.uk

01865 288140, 07349 956839

Designated Safeguarding Officers:

Mr James Ross, james.ross@regents.ox.ac.uk (01865 288153)

Ms Lily Morris, lily.morris@regents.ox.ac.uk

Designated Safeguarding Officer for Ministerial Students:

Rev'd Dr Ruth Moriarty

ruth.moriarty@regents.ox.ac.uk (01865 288147)

Useful Contact numbers for the use of Safeguarding Officers – please note, all disclosures MUST go through the College Safeguarding Officers, including those which need an immediate police presence.

- University Safeguarding Officers: Director of HR, 01865 (2)70152 (for issues involving University staff and Director of Student Welfare and Support Services, 01865 (2)80444 (for issues involving students).
- Police Kingfisher (Child Sexual Exploitation) Team Tel. 01865 309196
- NSPCC Helpline Tel. 0808 800 5000 (24 hours hours) help@NSPCC.org.uk

If the concern arises out of normal office hours (evenings and weekends) and the LSO/DSCO are not contactable, 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. The LSO/DSO must be informed ASAP.

Advice may also be sought on a no-names basis from the University of Oxford Safeguarding Lead, the Director of Student Welfare & Support Services, or from the Sexual Harassment and Violence Support Service.