



# Oriel College

UNIVERSITY OF OXFORD

## **SAFEGUARDING POLICY**

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**CONTACT DETAILS**

For contact details for the Designated Safeguarding Lead (DSL) and others, see the last page of this policy.

**NOTICE TO CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK**

If you are a child, young person or adult at risk reading this policy and anything or anyone worries you or makes you feel unsafe, please speak to your parents, guardian, family members or carers, as appropriate.

If for any reason you would rather not do this, you may contact any of the people listed on the last page and be assured that they are there to help you or point you in the direction of help.

## A. Introduction

Oriel College (the College) has a responsibility under the following legislative acts to ensure the protection and wellbeing of children and vulnerable adults who are part of the College community:

- 1998 Human Rights Act  
All persons have an absolute right to freedom from inhuman and degrading treatment.  
All persons have a right to respect for private and family life.  
All rights and freedoms in the act are applied without discrimination.
- 2003 Sexual Offences Act  
Improper relationships between a child or adult at risk will likely constitute an abuse of trust offence if a College Member occupies a position of trust with regard to children or adults at risk.
- 2005 Mental Capacity Act  
This is designed to empower people who may lack the mental capacity to make their own decisions about their care and treatment. It applies to people aged 16 and over.
- 2006 Safeguarding Vulnerable Groups Act  
This requires organisations to ensure safe recruitment practices and environments for children and adults at risk.  
This Act also creates an obligation to refer any harm or potential harm of children to the Disclosure and Barring Service (DBS).
- 2010 Equality Act  
It is illegal to discriminate according to protected characteristics.
- Public Sector Equality Duty  
This recognises the Public Sector's duty to oppose all forms of harassment and inequality.
- 2014 Care Act  
Emphasises the rights of all adults to live in safety, free from abuse and neglect.

The College is committed to safeguarding and promoting the health, safety, and welfare of its members, employees and visitors. The College recognises that it is likely that children and/or adults at risk will visit College premises, participate in activities at the College or interact with members of the College in a number of circumstances.

Everyone is responsible for safeguarding children and adults at risk, and the College is committed to establishing and maintaining a culture that allows staff to recognise and report safeguarding concerns.

## B. Information Security Classification

This policy represents an important statement of the College's fulfilment of its legal requirements, and so will be available for viewing on the College website.

### Information Sharing

The College will comply with its obligations in relation to the processing of personal data pursuant to the General Data Protection Regulations (GDPR). Any personal data created as part of this policy will be processed in accordance with the College's procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

A copy of the College's data protection policy and privacy notice is linked in **section L**.

The College has an obligation to respect the privacy and confidentiality of all individuals. However, early sharing of information is key to providing an effective response to concerns. It is not possible to ensure confidentiality in circumstances of alleged abuse. The College owes a duty of care to its students or visitors that may override the requirement to keep information confidential. Anyone making an allegation of abuse should be assured that:

- Personal information will only be shared in accordance with the relevant data protection principles, as provided for in the Data Protection Act 2018 and the GDPR.
- The College will take steps to protect the informant from any retaliation or unnecessary stress after a disclosure of alleged abuse has been made.

There will be circumstances in which it is necessary for a College member to share information with third parties such as the local authority, the police, the Charity Commission, or a child's parents or guardians.

## **C. Delegated Authority**

The ownership of this Policy has been delegated to the House Committee. The owner of this Policy will be the Domestic Bursar. The Committee is responsible for undertaking an annual review of College Safeguarding Policy and Procedures and the efficiency and effectiveness of the discharging of relevant safeguarding duties.

The College's Designated Safeguarding Lead (DSL) is the Domestic Bursar. The College's Designated Safeguarding Deputy (DSD) will be the Academic Registrar. The College's Designated Safeguarding Officer (DSO) will depend on the specific event but will usually either be the Outreach Manager or Accommodation Manager.

Information regarding the DSL, DSD and DSO must be clearly accessible on the College website.

The responsibilities of these roles can be found in **Section H**. Contact details for these individuals can be found in **Appendix A**.

The Academic Registrar is responsible for ensuring that the DSL/DSD, Dean and all relevant College tutors and staff members are informed of the admission of any students under the age of 18. Full details of College provision for students admitted under the age of 18 years can be found in **Section F** of this policy.

## D. Policy Statement

This policy aims to ensure that children (including students under the age of 18) and adults at risk, and all those who work with them, are safe and appropriately supported within our College and the activities we organise.

The College regards the welfare of children and adults at risk as of paramount importance and aims to safeguard their well-being, in particular by protecting them from abuse or neglect of any kind. Whilst the College does not act *in loco parentis*, it does recognise that it has a duty of care to children and young people in our charge.

The College respects all individuals irrespective of race, age, gender, disability, religion, sexual orientation, family status or social background. No one should be subjected to harm, abuse, or neglect.

The College has a zero-tolerance approach to abuse and other harmful behaviour.

## E. Definition of Terms

### "Abuse"

As stipulated by the Government Guidance [Working Together to Safeguard Children \(2018\)](#) and [Keeping Children safe in Education \(2022\)](#), this policy understands abuse as defined in the following forms:

- Physical – physical hurting or injuring.
- Emotional – persistent emotional maltreatment which results in severe or persistent adverse effects on the child's emotional development. Emotional abuse is often present in other categories of abuse, though it may occur independently.
- Sexual abuse and exploitation – forcing or enticing a child to take part in any sexual activity. The activity may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-contact activities such as looking at, or participating in the production of, pornographic material.
- Neglect – the persistent failure to meet basic needs, likely to result in the serious impairment of 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.

This list is not exhaustive. Abuse can take a variety of forms. Each type of abuse has its own specific warning indicators, which you should be alert to. Children and adults at risk may also be vulnerable to extremist ideology and radicalisation.

The Oxfordshire Safeguarding Adults Board also refers to the following categories of abuse:

- Domestic Abuse – patterns of behaviour in any relationship that is used to gain or maintain power and control over an intimate partner. This can involve multiple kinds and categories of abuse.
- Financial Abuse – the affected individual is deprived of their financial freedom by a third party. This may include control over bank accounts, controlling how they use income, or how they spend benefits they receive.

- Modern Slavery – The severe exploitation of others for personal or commercial gain. This can include human trafficking, forced labour, debt bondage/bonded labour, descent based slavery (being born into slavery), child slavery, forced and early marriage, domestic servitude.
- Organisational Abuse – poor working practices and/or inadequate care in a specific workplace setting which leads to the mistreatment or harm of children and adults at risk.
- Discriminatory Abuse
- Radicalisation and Extremism
- Self-neglect – the inability (intentional or non-intentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and well-being of the self-neglector and their wider community.

#### “Child”

For the purposes of this policy, “child” or “children” refers to a person or persons under the age of 18 (as defined in the [1989 Children Act](#)).

The fact that a child has reached 16 years of age, is living independently, or is in higher education does not change their status or entitlements to services or protection.

#### “Adult at Risk”

For the purposes of this policy, an “adult at risk” refers to “any person aged 18 years and over who is or may need care and support who is experiencing, or is at risk of abuse and neglect and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it” (as defined by the [2014 Care Act](#)).

#### “College Member”

For the purposes of this policy, a “College Member” is anyone at Oriel College, working with children or adults at risk, whether a Fellow, employee, student, volunteer, contractor, agency staff, Trustee, or other third party.

#### “Regulated Activity” (children)

Regulated activity is work that a barred person must not do.

This primarily includes:

- Unsupervised activities (including driving vehicles only for children).
- Working for establishments with opportunity for contact with children (“specified places”), such as schools, children’s homes, and childcare premises.

A full description of regulated activity for those in contact with children can be found [here](#).

#### “Regulated Activity” (adults)

Regulated activity for those in contact with adults refers to those activities provided to any adult which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time.

This means, for example, anyone providing personal care to an adult is in regulated activity irrespective of where that activity occurs.

There are six categories within the definition of regulated activity:



- Provision of Health Care
- Provision of Personal Care
- Provision of Social Work
- Assistance with General Household matters
- Assistance in the conduct of a person's own affairs
- Conveying

A full explanation of these categories of regulated activity can be found [here](#).

#### "Position(s) of Trust"

A position of trust is a paid or unpaid role which involves working with adults at risk or children. Those in a position of trust include those who have regular unsupervised contact with a child, or adults who look after a child at an educational institution at which they are not also receiving education.

## **F. Procedures**

### Recognising and Reporting Abuse

The abuse of children or adults at risk can and does occur both within an individual's family and in institutional or community settings. There is a list of indicators that a child or adult at risk is being abused or neglected set out in **Appendix B**.

It is the responsibility of all College members to act on concerns in order to safeguard the welfare of the child or adult at risk.

A disclosure of information that raises concerns may occur in a variety of settings including posting on a forum or in a written assignment. If you have any concerns about a child or adult at risk's welfare, you should act on this immediately.

College members should address any concerns to the DSO responsible for that activity, in the first instance. If College members have concerns regarding the DSO, they should discuss the matter with the DSL or DSD or contact Oxfordshire Social Services Department directly (**see Appendix A** for contact details).

If an individual feels that the DSO or DSL has not responded appropriately, then they are encouraged to contact Oxfordshire Social Services without delay.

Suspensions or allegations of abuse must not be discussed with anyone other than the DSL, DSD or assigned DSO.

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.

All College members (including those with obligations to particular codes of conduct, or professional ethics which 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. These will be reported to Oxfordshire Social Services, and – if necessary – the police.

College members should remember that those suffering from abuse are not always ready to discuss their experiences and/or may not always recognise that they are being abused.

The College aims to encourage openness and will support individuals who report their concerns under this policy, even if they turn out to be mistaken. Individuals reporting concerns will not suffer detrimental treatment because of raising a genuine concern.

#### Handling allegations or suspicions of abuse

It is a responsibility of the DSO and DSL/DSD to act on behalf of the College in dealing with allegations or suspicions of abuse. It is the task of Social Services, not the College, to investigate the matter, under S47 of the Children Act 1989 (in relation to children) and under the Care Act 2014 (in relation to adults at risk).

Under no circumstances should a College member conduct their own investigation into suspicions or allegations of abuse. College members also must not question persons closely; doing so may distort any investigation that may be carried out subsequently by the police or Social Services.

If a child or adult at risk displays potential signs of abuse as detailed in **Appendix B** of this policy, the person receiving the information should:

- Stay calm.
- Listen carefully to what is disclosed.
- Use language that can be understood by the affected individual.
- Offer reassurance to the individual that they are not to blame, and that they will be kept safe.
- Do not show disbelief.
- Explain that information may need to be shared. Do not promise confidentiality.
- If someone begins to disclose something but stops once you say you cannot confirm confidentiality, you should still inform the DSO.
- Keep questions to an absolute minimum. Only clarify what the person is saying (such as "what happened?"). Avoid leading questions.
- Tell the individual what will happen next and with whom the information will be shared.
- Make a note or record of conversations on the same day.
- Refer every concern immediately to the DSO.
- Seek advice and support for yourself.
- You must not conduct further independent investigations.

#### Record of Concerns

The record of conversations noted above should include the following information:

- The name of the person you are concerned about and their contact details.
- The name of the complainant who raised the concern (if different from the above).
- The nature of the allegation or concern.
- The child or adult at risk's account of what has occurred (this should be recorded as accurately as possible and in the actual words used of the person, along with any questions asked).
- Any dates, times or places and other potentially useful information.
- A clear indication, whenever appropriate, that the author of the report is expressing an opinion.
- A description of any visible physical injury (clothing must not be removed to check the child or adult at risk).

The record may be used in later criminal proceedings and it is therefore vital that what the child or adult at risk discloses is recorded as accurately as possible. The record must be drafted in the child or adult at risk's words, and should include the assumptions or opinions of others.

#### Following the receipt of an allegation or concern

The problem should be reported immediately to the DSO/DSL/DSD who will take appropriate action. The following authorities should also be contacted:

If the concern arises outside of normal office hours (evenings and weekends):

- Contact should be made with [the Oxfordshire Multi-Agency Safeguarding Hub \(MASH\)](#) on 0345 0507666. For all child protection and immediate safeguarding concerns

Or:

- The Oxfordshire Social Services Emergency Duty Team on 0800 833408.
- Advice can also be sought from the NSPCC 24 hour-helpline on 0800 800 5000, or from the Thames Valley Police on 01865 542 047.

In an emergency, dial 999. The DSL, DSO (or DSD) should be contacted as soon as possible thereafter.

#### Dealing with allegations or suspicions about a student

If an allegation of abuse is made against a student, the DSO may suspend the student from College pending investigation.

If the student concerned is aged under 18 years, the DSO will inform the child's parent or guardian (or an authority identified as having parental responsibility). The matter should then be referred to the Oxfordshire Social Services and, if appropriate, the police.

#### The status of the individual subject to an allegation

The College will keep the person who is subject of the allegation informed of the progress of the case, and arrange to provide appropriate support while the case is ongoing. If the person is suspended, the College will also make arrangements to keep the individual informed about developments in the workplace.

The fact that a person tenders their resignation, or ceases to provide their services, will not prevent an allegation being investigated in accordance with this policy. Compromise agreements will not be used in these cases.

#### Malicious allegations

If the College concludes that the individual has made false allegations maliciously, they may be subject to disciplinary action.

#### Learning Lessons

It is important that records of all allegations are made by College and that allegations are concluded by a period of review and learning lessons.

Learning lessons should not just be focused on those cases that are concluded and substantiated, but should include all allegations to ensure that the College's safeguarding procedures are continually robust.

#### Planning an activity for children and/or adults at risk

Any College member who has responsibility for organising an activity involving children and/or adults at risk must nominate an appropriate individual to act as

the DSO for the activity. The DSL/DSD and other relevant parties (e.g. staff members/porters) should be informed who the DSO for a particular event or activity is.

Activities should:

- Be designed so that appropriate training and supervision is available to those working with children or adults at risk.
- Minimise occasions on which members of the college will need to work alone in an unsupervised way with children or adults at risk.
- Be appropriately risk assessed.

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.

When the College facilities are being used by an external provider. The College as part of its own due diligence would seek clarification of said providers safeguarding policy and arrangements.

This may include but, not limited to requesting the following:

- Safeguarding Policy
- Relevant Risk Assessment(s)
- Details of DSL/DSD and DSO

#### Risk assessments

Every activity that involves children and/or adults at risk should be risk assessed.

The assessment should consider how the risks identified can be minimized. It should also outline the local processes for reporting concerns, as well as taking account of Health and Safety considerations.

The risk assessment should be checked by the appropriate DSL/DSD and a copy will be filed with the DSL before the activity is undertaken. 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 DSO.

Completed risk assessments should be made available to all staff, volunteers, and third parties involved in the activity.

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 measures in accordance with local education authority guidelines.

#### Candidates for admissions interviews

Candidates for admission to oriel at undergraduate level are ordinarily interviewed via an online interview process however they may be invited to stay at the College for a period of days during/following the interview selection process. The College recognises that it is likely that most candidates will be under the age of 18.

The College has established risk assessment and procedures for the interview process, whether that be online or in person, designed to ensure safeguarding of

candidates whilst also fulfilling selection requirements, including the requirements that:

- All student helpers are appropriately trained and given specific information about how to respond to concerns or reports of neglect or abuse.
- Appropriate arrangements are made by the DSO for admissions for welfare support.
- Head of departments are briefed regarding processes during this period.
- Any other members of the College who may be alone with candidates for significant time are DBS checked (such as the Nurse, Welfare Officer(s) and the Dean) in accordance with the Safeguarding Vulnerable Groups Act 2006.
- The College Bar is closed during any in person interview period.
- Interviews always have two members of staff in attendance who have been Safeguard trained by the university.
- Candidates are briefed regarding expectations during their stay in College.
- All candidates visiting College sign an agreement that the College may contact their parents or nominated adult in the case of emergency.

#### Students under the age of 18

The College may admit students who commence their studies before their 18<sup>th</sup> birthday. The College recognises that:

- Anyone under the age of 18, as a matter of law, is a child.
- The College has a duty of care towards children.
- The College is not able to take on the usual rights, responsibilities and authority that parents have in relation to a child and it will not act in *loco parentis* in relation to students who are under the age of 18 years.

The Academic Registrar is responsible for ensuring that the DSL/DSD, Dean and all relevant College tutors and staff members are informed of the admission of any students under the age of 18.

The Academic Registrar is responsible for ensuring that the hall, bar and lodge have the names of any students under the age of 18.

The Academic Registrar is responsible for gaining written agreement from parents and students under the age of 18 that they accept the provisions put in place. A copy of the authorisation form can be found in **Appendix D**.

#### Recruitment

The following should be noted in relation to this policy, as it directly represents part of the College's commitment to safeguarding.

All those involved in the recruitment of staff whose roles will involve them having direct engagement with children or adults at risk will undergo safer recruitment training.

Any safeguarding requirements pertaining to the fulfilment of employment will be clearly outlined in the job advert and job description. The job advert and description will also state whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974.

If a post is identified as requiring interaction with children or adults at risk, shortlisted candidates will be asked to complete a self-declaration of their criminal

record or information that would make them unsuitable for their job role. A self-declaration may include:

- Criminal history
- If the candidate is included on the disclosure and barring service's list.
- If the candidate is prohibited from teaching or working with children and/or adults at risk.
- If the candidate is known to the police and/or local authority's social care.
- If the candidate has been disqualified from providing childcare, or has been barred from caring for adults at risk.

In addition to usual practice on obtaining references set out in the College recruitment processes, where appropriate, the College will seek references:

- From the relevant employer from the last time the applicant worked with children or adults at risk (if not currently working with these groups). If the applicant has never worked with children or adults at risk, then a reference from their current employer will be gathered.
- Which provide information that satisfies the applicant's suitability to work with children and adults at risk, providing any substantiated safeguarding concerns or allegations. Information about concerns or allegations which are unsubstantiated, false, or malicious will not be included.

During interviews with candidates for posts involving work with children or adults at risk, potential areas of concern should be explored and the applicant's suitability to work with children established. Areas of concern that should lead to future probing include:

- An implication that (non-vulnerable) adults and children are equal.
- Lack of recognition and/or understanding of the vulnerability of children and adults at risk.
- Inadequate understanding of the appropriate boundaries between adults and children and adults at risk.
- Indicators of negative safeguarding behaviours.

#### Pre-Employment Vetting

Where a candidate has been identified as suitable for a post which would involve working with children and/or adults at risk, the following pre-employment checks must be carried out:

- A candidate's identity must be verified. A birth certificate will be checked where available, or failing that a passport.
- An enhanced DBS check certificate from the applicant (where this is not available or is out of date, the candidate will be required to undergo a DBS check).
- Verification of the candidate's mental and physical fitness to carry out their work responsibilities.
- Verification of the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, relevant guidance can be found [here](#).
- Verification of professional qualifications as appropriate.
- Any individual being recruited into a teaching role with children or adults at risk must not be subject to a prohibition order issued by the Secretary of State.

There is no requirement for an enhanced DBS certificate to be obtained if, during a period which ended not more than three months before the candidate's date of appointment, the applicant has worked in the UK in a post which brought the person regularly into contact with children. Though this requirement may be bypassed in the aforesaid circumstance, the Head of Department may still request that a check is undertaken if they feel it would be appropriate.

If an individual has lived or worked outside of the UK, they must still undergo the same checks as all other staff who are previous UK residents. This includes obtaining a DBS certificate even if the individual has never been in the UK.

Further checks for those not resident in the UK could include, where available:

- Criminal records checks for overseas applicants.
- Obtaining a letter (via the applicant) from the professional regulating authority in which the applicant has worked confirming that they have not imposed any sanctions or restrictions.

## G. Scope

This policy applies to all activities involving children or adults at risk (as defined in **section E**) and to all College members.

The College has a duty to prevent individuals from being drawn into terrorism under the Counter Terrorism and Security Act 2015. This duty is known as the Prevent duty. This policy will therefore apply if an individual raises concerns about a child or adult at risk of being drawn into terrorism.

## H. Training and Responsibilities

The Designated Safeguarding Lead, the Designated Safeguarding Deputy, and the Designated Safeguarding Officer will be required to undertake an enhanced DBS check and social media screening.

The responsibilities of these roles are set out below:

### Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead 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 adults at risk.
- Acting as the main contact within the College for the protection of children and adults at risk.
- Act as a source of support, advice, and expertise for all staff.
- Ensuring that appropriate College members are provided with information, advice and training on the protection of children and adults at risk.
- Establishing and maintaining contacts with the local Children's Social Care Services departments and Police Service.
- Maintaining accurate confidential records of reported child abuse cases and the action taken in each case.
- Ensuring appropriate measures for the secure storage of information.
- Liaising with staff to ensure appropriate support to students and parents.
- Liaise with the mental health lead where safeguarding concerns are linked to mental health.



- Ensuring appropriate support is provided to those reporting concerns or disclosures.
- Taking lead responsibility for safeguarding and child protection (including online safety).

The Designated Safeguarding Lead will be provided with any additional time, funding, training, resources, and support they feel is necessary to properly carry out their duties effectively.

The Designated Safeguarding lead should ensure that they (or the DSD in their absence) are always available (that is, reachable through phone, email, or in person contact) during College hours to discuss any safeguarding concerns.

#### Designated Safeguarding Officers (DSOs) and Designated Safeguarding Deputy (DSD)

DSOs and the DSD are responsible for:

- Implementing and promoting this policy.
- Acting as the main contact, for their designated activities, for the protection of children or adults at risk.
- Ensuring that appropriate College members assisting with any designated activity are provided with information, advice, and training where required.

The DSD is responsible for:

- Ensuring that College members are fully briefed and/or trained (as appropriate) on the implications of this policy.

DSOs are responsible for:

- Ensuring that confidential records of reported abuse cases are accurately reported to the DSL or DSD.

#### Other College Members

Where a role may require College members to have unsupervised contact with, regularly care for, train, supervise, or be in sole charge of children or adults at risk, the College will require satisfactory completion of a DBS check at the appropriate level.

All College members involved with Regulated Activities in relation to children or adults are expected to comply fully with the guidance and procedures set out in this policy.

It is the responsibility of **all College members** to act on concerns in order to safeguard the welfare of the child or adult at risk.

#### Conduct around children or adults at risk

College members should note that inappropriate behaviour can occur via the telephone, internet, email, as well as during direct interaction.

College members' conduct should adhere to the advice listed in the policy at **Appendix C** and the University's Safeguarding Code of Conduct (linked in **section L** of this policy).

The Sexual Offences Act 2003 provides that intimate contact between an adult and a child, where that adult is in a "position of trust" with respect to the child, is



a criminal offence. The definition of a “position of trust” can be found in **section C** of this policy.

The College is an adult environment and staff and students are discouraged from bringing children onto College premises. With the exception of brief visits or planned activity, students and College members are expected to not bring children to the College.

If staff or students do bring children to the College, they are responsible for those children who must be supervised at all times. Any visitor the College, or third party, bringing children onto College premises is similarly responsible for those children who must be supervised at all times.

#### Images and Videos of Children

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 2018.

Where images are stored in a way that makes the data subject identifiable, or where the images are used for publication (online or 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.

#### Training Requirements

Any member of the College who will be planning activities with children should have completed the [on-line training provided by Oxford Safeguarding Children Board](#) (*An Introduction to Safeguarding*), together with any additional training that may have been identified by the risk assessment process (as outlined in **section F**).

Any member of the College who will be planning activities with adults at risk should have completed the [on-line training provided by Oxford Safeguarding Adults Board](#) (*An Introduction to Adult Safeguarding*), together with any additional training that may have been identified by the risk assessment process.

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

Training will be recorded in the Safeguarding folder. The DSL/DSD will monitor training requirements.

## **I. Internal Help and Raising Concerns**

If an individual has concerns regarding potential abuse of a child or adult at risk, they should follow the procedure set out in **section F**.

Concerns or questions regarding the policy generally should be addressed to the DSL, whose contact details can be found in **Appendix A**.

If a College member is concerned regarding the conduct or responsiveness of the DSL or DSD in handling a case of suspected or alleged abuse, they should contact the Oxfordshire Social Services.

## J. Consequences of Non-Observance

As stated in **section F**, if the College finds that a false allegation of abuse has been made with malicious intent, that individual will be subject to disciplinary action if appropriate.

An individual found to be withholding information as part of an investigation into an allegation of abuse will be referred to the appropriate external body or social security services for appropriate reprimand.

Safeguarding is the responsibility of all College members. Maintaining vigilance and reporting concerns is a crucial duty to the welfare of the whole College community.

## K. Further Help

Questions regarding this policy should be directed to the DSO in the first instance.

More complex enquiries following this – or in the absence of a DSO – should be referred to the DSL, or the DSD in the former's absence.

## L. Reference

This policy should be read in conjunction with the University of Oxford's Safeguarding Code of Practice (2015).

A copy of the College's GDPR policy can be found [here](#). The College's privacy notice can be found [here](#).

This policy should be read in conjunction with the following College policies:

- Code of Conduct
- Health and Safety Policy
- Personal Relationships at Work Policy
- Equality, Diversity and Inclusion (EDI) Policy
- GDPR and Data Protection Policy
- Disciplinary Policy
- Whistleblowing Policy
- Fundraising and Vulnerable People policy

Many of these policies are publicly available on the College website. For access to those policies not publicly available, the College policy SharePoint should be consulted. Alternatively, enquiries can be directed to the Governance Officer at [governance@oriel.ox.ac.uk](mailto:governance@oriel.ox.ac.uk).

This policy should also be read in conjunction with the following legislation and guidance:

- The Prevent Duty
- Data Protection Act 2018
- Sexual Offences Act 2003
- Counter Terrorism and Security Act 2015
- Safeguarding Vulnerable Groups Act 2006

### M. Policy version control table

Version	Owner	Agreed by House Committee	Agreed by Governing Body	Reason for amendment	Amended by	Next review	Further notes
v. 1	Domestic Bursar	27 January 2021	10 February 2021	Annual Review Cycle	Domestic Bursar	<b>October 2022</b>	
v. 2	Domestic Bursar	19 October 2022	9 November 2022	Annual Review Cycle	Governance Officer	<b>October 2023</b>	
v.3	Acting Domestic Bursar	1 May 2024	15 May 2024	Annual Review Cycle	Governance Officer	<b>October 2024</b>	v.3 was first considered by the House Committee on 27 January 2024, and the approval was deferred until May 2024.
v.4	Domestic Bursar	23 October 2024	13 November 2025	Annual Review Cycle	Domestic Bursar	<b>October 2025</b>	
v.5	Domestic Bursar			Annual Review Cycle	Governance Officer	<b>October 2026</b>	

## N. Appendices

### Appendix A – Contact Information

<b>Contact Information</b>	
<b>Designated Safeguarding Lead (DSL)</b>	Mr Matthew Morgan – Domestic Bursar from 19 <sup>th</sup> February 2024 01865276555  <a href="mailto:matthew.morgan@oriel.ox.ac.uk">matthew.morgan@oriel.ox.ac.uk</a> 01865 286527
<b>Designated Safeguarding Deputy (DSD)</b>	Mr Joseph Cole – Academic Registrar <a href="mailto:joseph.cole@oriel.ox.ac.uk">joseph.cole@oriel.ox.ac.uk</a> 01865 276520
<b>Designated Safeguarding Officers (DSOs)</b>	Outreach Manager – Carys Owen <a href="mailto:outreach@oriel.ox.ac.uk">outreach@oriel.ox.ac.uk</a> 01865616763  Miss Hannah Simons – Accommodation Manager <a href="mailto:hannah.simons@oriel.ox.ac.uk">hannah.simons@oriel.ox.ac.uk</a> 01865 276547  Alison Beasley – Designated Officer (LADO) <a href="mailto:alison.beasley@oxfordshire.gov.uk">alison.beasley@oxfordshire.gov.uk</a> 01865 815956 07833 436649
Oxfordshire MASH (Multi-Agency Safeguarding Hub)	<a href="mailto:mash-childrens@oxfordshire.gcsx.gov.uk">mash-childrens@oxfordshire.gcsx.gov.uk</a> <b>03450 507666</b>
Oxfordshire Social Services Emergency Duty Team	<b>0800 833408</b>

### Appendix B – Indicators that a child or adult at risk is being or has been abused

The following may indicate that a child or adult at risk 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 explanation appears inconsistent.
- The person describes an abusive act or situation.
- Unexplained changes in behaviour.
- Inappropriate sexual awareness or sexually explicit behaviour.
- The person appears distrustful of adults or those in positions of trust.
- The person is not allowed to be involved in normal social activities.
- The person becomes increasingly dirty or dishevelled in appearance.
- An adult's sudden inability to pay bills.
- An adult's signature does not resemble their normal signature.

This list is not exhaustive. It is important to report all concerns, however seemingly insignificant.

#### [Appendix C – Recommended conduct when interacting with children and/or adults at risk.](#)

Conduct to be avoided:

- Spending excessive amounts of time alone with children or adults at risk.
- Taking children or adults at risk to your home.
- Being alone in a vehicle with children or adults at risk.

Conduct never to be sanctioned:

- Engaging in rough, physical, or sexually provocative games.
- Giving drugs or other inappropriate substances (including alcohol) to children. Under the [Licensing Act 2003](#), it is an offence for a child to be supplied with or knowingly consume alcohol on a licensed premises (the College holds a Premises License).
- Allowing or engaging in any form of inappropriate touching.
- Making sexually suggestive comments to children or adults at risk, even in jest.
- Allowing allegations made by a child or adult at risk to go unreported.
- Doing things of an intimate nature for children or adults at risk that they can do for themselves.

College members should:

- Treat everyone with fairness, equality and respect.
- Be sensitive to 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.
- Consider whether contact with an individual should involve a colleague's presence.
- Be aware that physical contact may be misinterpreted.
- Retain a professional approach at all times, respect a right to privacy, and not enter a bedroom in residential accommodation without prior authorisation (except in the case of emergency).

[Appendix D – Under-Age Student Authorisation Form](#)**UNDER-AGE STUDENT AUTHORISATION**

Student's name:

Date of birth: DD/MM/YYYY

Programme of Study:

Oriel College generally makes contracts with students who have reached the age of majority and so are able to independently 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 for them to be able to study here.

**1. Level of care and support**

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

If a parent wishes their child to receive additional care, support, or oversight, they must personally make such arrangements and take responsibility for any associated provision(s).

**2. Emergency contacts**

The parent must ensure that the College is supplied with emergency contact details and that these details are updated. If the parents are not present in the UK, they should nominate a guardian in this country who will act for them if necessary. The parent must agree for the College to be able to arrange emergency medical care (or other emergency care) for their child until contact is made and the parent's wishes ascertained.

### **3. Exclusions**

The underage student will not be able to enter College premises licensed for the supply of alcohol where the terms of that license specify those present must be 18 or over. The underage student will not be permitted to hold an office where to do so would require them to carry out activities that are unlawful as a minor. However, reasonable adjustments will be made to an office where possible.

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 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 may be treated as a breach of regulations and dealt with accordingly.

### **4. 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. The contract will be deemed to have been underwritten and guaranteed by the parent or guardian once the student has agreed to the terms of the contract.

Generally, the College shall deem the student as competent to understand all aspects of the normal College process, to obey the College regulations, and to be disciplined under College procedures. Parents and guardians will not as a matter of routine be contacted concerning any matter. However, the College will act to recover debts from the parent/guardian if the student fails to pay them and will reveal necessary details to the parent or guardian if necessary to recover these debts.

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 ensure that in the event of any emergency or problem, the student knows who to contact for help.

The College has identified the following central support individuals 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 disclosed to them with discretion and sensitivity and will treat addressing the student's difficulties as a matter of priority.

<b>Senior Dean</b>	Mr Dominic Alonzi <a href="mailto:dominic.alonzi@oriel.ox.ac.uk">dominic.alonzi@oriel.ox.ac.uk</a>
<b>Academic Registrar</b>	Mr Joseph Cole <a href="mailto:joseph.cole@oriel.ox.ac.uk">joseph.cole@oriel.ox.ac.uk</a> 01865 276520

**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:

Academic Office, Oriel College, Oxford, OX1 4EW (or by email to [academic.registrar@oriel.ox.ac.uk](mailto:academic.registrar@oriel.ox.ac.uk)).

Student's name:

Date of Birth (DD/MM/YYYY):

Programme of Study:

Parent/legal guardian details (please give as much detail as possible):

**SIGNATURES**

I have read the above details. I understand them and I consent to them.

Parent PRINT NAME	
Parent SIGN NAME	
Date	

Student PRINT NAME	
Student SIGN NAME	
Date	