



Hertford College

OXFORD

SAFEGUARDING CODE OF PRACTICE

Version 2.1 September 2025

Replaces all previous College codes of conduct, policies or similar in relation to Safeguarding.

1. INTRODUCTION

- 1.1. Safeguarding is the process of protecting an individual's health, wellbeing, and human rights, ensuring they can live free from harm, abuse, and neglect.
- 1.2. The College is committed to supporting that ideal, by ensuring a safe and supportive environment for all its members, staff and visitors. This commitment is reflected throughout the College's various policies and practices, and set out in particular within:
 - 1.2.1 *the Harassment & Bullying Policy*
 - 1.2.2 *the Staff and Student Relationships Policy*
 - 1.2.3 *the Freedom of Speech Code of Practice*
 - 1.2.4 *the Equality, Diversity & Inclusion Policy*
- 1.3. The College recognises that the Safeguarding of **children, and adults at risk** is a matter of paramount importance, and that it has a legal duty to safeguard the welfare of children who come onto its premises, or come into contact with its members¹. This **Safeguarding Code of Practice** addresses the particular needs and requirements of these groups.

2. SCOPE

- 2.1. This Code of Practice applies to all College activities involving children and/or adults at risk, and to all College members.
- 2.2. For the purposes of this Code of Practice:
 - 2.2.1 'child' or 'children' refers to a person or persons under the age of 18².
 - 2.2.2 'adult at risk' 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*³.
 - 2.2.3 a College member is a fellow, employee, student, or volunteer acting for (or in support of), the College.

¹ Children Acts 1989 and 2004, and the *Health and Safety at Work etc Act 1974*.

² Children Act 2004

³ Department of Health definition

3. PREVENTATIVE MEASURES

- 3.1. The College's Lead Safeguarding Officer (LSO) is the Fellow for Welfare.
- 3.2. The College's Designated Safeguarding Officer (DSO) will depend on the specific event but in most cases will be the Domestic Bursar or Registrar.
- 3.3. The LSO and DSOs carry the primary day to day responsibility within the College for ensuring the protection of children and adults at risk (see Appendix A for contact details), and have a range of specific responsibilities, set out later in the Policy.
- 3.4. Where a role may require College members to have unsupervised contact with, regularly care for, train, supervise or be in sole charge of children and/or adults at risk, the College will require satisfactory completion of a Disclosure & Barring Services (DBS) check at the appropriate level.
- 3.5. All College members are expected to comply fully with the guidance and procedures set out in this Policy.
- 3.6. Contractors employed by the College are expected to comply fully with the guidance and procedures set out in this Policy. It is expected that contractors will conduct vetting of their own staff to ensure that no person subject to any restrictions from working with children and/or adults at risk is employed to access or conduct work on College property, or to have access to children and/or adults at risk in the course of contracted work conducted elsewhere for the College.

4. FORMS OF ABUSE

- 4.1. The UK Government guidance, *Working Together to Safeguard Children* (2010) (1.33–1.36), sets out four categories of abuse:
 - 4.1.1 Physical – the physical hurting or injuring of a child or adult at risk.
 - 4.1.2 Emotional – the persistent emotional maltreatment of a child or adult at risk, which results in severe or persistent adverse effects. Emotional abuse is often present in other categories of abuse, although it may occur independently.
 - 4.1.3 Sexual – the forcing or enticing of a child or adult at risk 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 or adults at risk in looking at, or in the production of, pornographic material.
 - 4.1.4 Neglect – the persistent failure to meet a child or adult at risk's basic needs, likely to result in the serious impairment of their 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. The abuse of children and or adults at risk can and does occur both within family and in institutional or community settings. The following may indicate that a child or adult at risk is being or has been abused:
 - 5.1.1 unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
 - 5.1.2 an injury for which the explanation appears inconsistent;
 - 5.1.3 the child or adult at risk describes an abusive act or situation;
 - 5.1.4 unexplained changes in behaviour;
 - 5.1.5 inappropriate sexual awareness or sexually explicit behaviour;
 - 5.1.6 the child or adult at risk appears distrustful of adults;
 - 5.1.7 the child or adult at risk is not allowed to be involved in normal social activities;
 - 5.1.8 the child or adult at risk 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 or adult at risk.

6. DEALING WITH SUSPICION OR ALLEGATIONS OF ABUSE OF A CHILD OR ADULT AT RISK

- 6.1. Those working with children and adults at risk may:
 - 6.1.1 have alleged abuse disclosed to them;
 - 6.1.2 suspect abuse is being carried out; or
 - 6.1.3 be accused of abusing those in their charge.
- 6.2. Whilst these issues may require very different courses of action, it is essential that the safety and welfare of the child or adult at risk is prioritised.
- 6.3. 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. 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.
- 6.4. It is the DSO/LSO's responsibility to act on behalf of the College in dealing with allegations or suspicion of abuse. In the case of children it is the task of Social Services, not the College, to investigate the matter⁴. 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.
- 6.5. 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:

⁴ Section 47 of the Children Act 1989

- 6.5.1 React in a calm but concerned way;
- 6.5.2 Tell them that they are right to share what has happened, and that they are not responsible for what has happened;
- 6.5.3 Find an early opportunity to explain that it is likely that the information will need to be shared;
- 6.5.4 Take what the child or adult at risk says seriously and allow them to continue at their own pace;
- 6.5.5 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;
- 6.5.6 Not interrupt the child or adult at risk when they are recalling significant events;
- 6.5.7 Reassure the child or adult at risk that the problem can be dealt with;
- 6.5.8 Tell the child or adult at risk what will happen next and with whom the information will be shared;
- 6.5.9 Not promise to keep secrets;
- 6.5.10 Make a full record of what is said and done, though this should not result in a delay in reporting the problem.
- 6.6. The record should include:
 - 6.6.1 The child's or adult at risk's account of what has occurred;
 - 6.6.2 Any dates, times or places and any other potentially useful information;
 - 6.6.3 The nature of the allegation or concern;
 - 6.6.4 A description of any visible physical injury (clothing should not be removed to inspect the child or adult at risk).
- 6.7. 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 in the child's or adult at risk's words, and should not include the assumptions or opinions of others.
- 6.8. The problem should be reported immediately to the DSO, or in their absence the LSO who will take the appropriate action. In the case that either cannot be contacted, and where it is reasonably believed that there is an urgent need to act to prevent (further) harm, contact should be made direct with Social Services, or the Police. Contact details are provided later in Appendix A.
- 6.9. 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.
- 6.10. 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.

- 6.11. In the case of serious allegations of abuse, the College will not itself investigate, but will immediately report the matter to Oxfordshire Social Services and, if necessary, the Police.
- 6.12. Reports of abuse may require:
 - 6.12.1 A child protection investigation (in the case of children);
 - 6.12.2 A criminal investigation;
 - 6.12.3 Action by the College/University to discipline or remove a College member or employee.

7. PLANNING AN ACTIVITY

- 7.1. Any College member who has responsibility for organising an activity involving children and/or adults at risk must nominate an individual to act as the designated safeguarding lead for the activity.
- 7.2. Activities should:
 - 7.2.1 be designed so that appropriate training and supervision is available to those working with children or adults at risk;
 - 7.2.2 minimise occasions on which members or staff will need to work alone in an unsupervised way with children or adults at risk; and
 - 7.2.3 be appropriately risk assessed.
- 7.3. Every activity that involves children and/or adults at risk should be risk assessed, and the assessment should consider how the risks identified can be minimised. It should also outline the local processes for reporting concerns, as well as taking account of Health and Safety considerations. Once completed, the risk assessment must be approved by a Safeguarding Officer before the activity is undertaken. The risk assessment for any activity involving children or adults at risk should identify at least one individual who will act as the key contact point to deal with such matters. The safeguarding lead for the activity is responsible for ensuring that any concerns or allegations are escalated to the appropriate Designated Safeguarding Officer without delay.
- 7.4. Completed risk assessments should be made available to all staff or volunteers involved in the activity.
- 7.5. Any pre-employment or pre-activity checks should be carried out in accordance with relevant University and/or College procedures.
- 7.6. Children and adults at risk who are participating in a College activity must, as part of their induction to the activity, be given clear information about how, and to whom, they can report concerns about any member of the College with whom they will be interacting. More than one point of contact should always be given and the details of the College's Safeguarding Officers included (in addition to the contact details of the nominated safeguarding lead for the activity) so that complaints can be made directly to these officers, where appropriate.
- 7.7. It is expected that for visits by schools where members of staff of that school are in attendance, the school will independently complete its own risk assessment and take its

own child protection steps in accordance with their own, or local education authority, guidelines. In such cases, the obligations in this section may reasonably be limited to supporting that independent endeavour.

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:
 - 8.1.1 Anyone under the age of 18, as a matter of law, is a child;
 - 8.1.2 The College has special duties of care towards a child;
 - 8.1.3 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:
 - 8.2.1 ensuring that the College DSO, LSO, relevant College Officers and tutors are informed of the admission of any students under the age of 18.
 - 8.2.2 ensuring that the hall, bar and lodge have the names of any students under the age of 18.
 - 8.2.3 gaining written agreement from parents and students under the age of 18 that they accept the provisions put in place.

9. CONFIDENTIALITY

- 9.1. 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.
- 9.2. Anyone receiving a report of abuse, or related concern, should:
 - 9.2.1 only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken;
 - 9.2.2 never tell anyone who does not have a clear 'need to know';
 - 9.2.3 take whatever steps they can to protect the informing child or adult at risk from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made;
 - 9.2.4 provide assurance to the person making the report or raising the concern that this will be their approach.
- 9.3. Safeguarding Officers will share information, as appropriate, with relevant colleagues to ensure that the relevant authorities both within and outside of the College are involved and that any necessary processes can be followed.

- 9.4. 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 a child's parents or guardians.

10. CONDUCT AROUND CHILDREN

- 10.1. College members should remember that inappropriate behaviour can occur via remote forms of communication (e.g. the telephone, internet and e-mail), as well as during direct interaction.
- 10.2. Conduct to be avoided includes:
- 10.2.1 Spending excessive amounts of time alone with children, away from others;
 - 10.2.2 Taking children to your home;
 - 10.2.3 Being alone in a vehicle with children.
- 10.3. Conduct must never involve:
- 10.3.1 Engaging in rough, physical or sexually provocative games;
 - 10.3.2 Giving children inappropriate drugs or other inappropriate substances, including alcohol (NB: one of the four key objectives of the *Licensing Act* 2003 is the 'protection of children from harm', and 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 & Club Licence;
 - 10.3.3 Allowing or engaging in any form of inappropriate touching;
 - 10.3.4 Making sexually suggestive comments to children, even in jest;
 - 10.3.5 Allowing allegations made by a child to go unreported;
 - 10.3.6 Doing things of an intimate nature for children that they can do for themselves.
- 10.4. College members should:
- 10.4.1 Be sensitive to children's appearance, race, culture, religious belief, sexuality, gender or disability;
 - 10.4.2 Act as a good role model and challenge any unacceptable behaviour from children or from other College members;
 - 10.4.3 Report all allegations or suspicions of child abuse using the Procedures outlined in this Policy;
 - 10.4.4 Consider whether contact with an individual child should involve a colleague's being present;
 - 10.4.5 Be aware that physical contact with a child may be misinterpreted;
 - 10.4.6 Retain a professional approach to children, including avoiding physical contact with a child;
 - 10.4.7 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.

- 10.5. 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.
- 10.6. It may be reasonable 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 general 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 at risk adult is published, the data subject should, as far as is practicable, be unidentifiable.

11. TRAINING

- 11.1. Any member of the College who will be planning activities with children should have completed the 'Introduction to Safeguarding' on-line training provided by Oxfordshire Safeguarding Children Board, together with any additional training that may have been identified by the risk assessment process.
- 11.2. Anyone holding the role of Safeguarding Officer and their deputies will undergo detailed training in safeguarding issues on a regular basis.
- 11.3. Activity organisers (for example, involving residential courses for young people) may wish to arrange additional training.
- 11.4. New college staff will receive relevant information on child protection and safeguarding as part of an induction programme.
- 11.5. Student Ambassadors will be provided with initial training on Child Protection and safeguarding matters, and will be given refresher training as appropriate.

12. RESPONSIBILITIES

- 12.1. All College members are responsible for following the guidance set out in this policy, to the extent that it may apply to them, or the role they may be undertaking from time to time. Failure to adhere to such guidance (whether through negligence, or wilful disregard) may be treated as misconduct, and dealt with under the relevant College disciplinary procedures applying to the member concerned. Where they are of a sufficiently serious nature, breaches may be treated as serious, or gross misconduct.
- 12.2. The LSO and the DSO(s) are responsible for:
- 12.2.1 Implementing and promoting this Policy;
 - 12.2.2 Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children;

- 12.2.3 Holding and being conversant with current local and national Child Protection procedures;
 - 12.2.4 Keeping up to date through training. It is a requirement that this takes place at least every two years);
 - 12.2.5 Ensuring that appropriate College members are provided with information, advice and training on the protection of children and adults at risk;
 - 12.2.6 Establishing and maintaining contacts with the local Children's Social Care Services departments and Police;
 - 12.2.7 Maintaining confidential records of reported breaches of the policy, or allegations of abuse relating to any children or adults at risk, and any action taken;
 - 12.2.8 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;
 - 12.2.9 Ensuring that this policy is available to parents and teachers of children working with the College.
- 12.3. The Governing Body is responsible for undertaking periodic reviews of the College's Safeguarding policy and procedures, to include the effectiveness with which the related duties have been discharged.

*Approved by the **Governing Body**
September 2025*

APPENDIX A

1. CONTACT INFORMATION

- 1.1. Lead Safeguarding Officer: Dr Vladyslav Vyazovskiy, Fellow for Welfare
- 1.2. Designated Safeguarding Officers:
 - Mr James Hill, Domestic Bursar
 - Ms Megan Roper, Registrar
- 1.3. Oxfordshire Children's Social Care
 - Tel. 01865 323048 (Office Hours)
 - Tel. 0800 833408 (Out of Hours)
- 1.4. Oxfordshire Safeguarding Children Board
 - LADO.safeguardingchildren@oxfordshire.gov.uk
 - Tel. 01865 810603
- 1.5. Police Child Protection Unit
 - Tel. 01865 335199
- 1.6. NSPCC Helpline
 - Tel. 0800 800 5000 (24 hours)

2. EXTERNAL LINKS

- 2.1. Oxfordshire Multi-Agency Safeguarding Hub:
<https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub>
- 2.2. For children: Oxfordshire Safeguarding Children Board: www.oscb.org.uk/
- 2.3. For at-risk adults: Oxfordshire Safe from Harm: www.safefromharm.org.uk