



Children and Adults at Risk
Safeguarding Policy

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1. Introduction

Homerton College aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk¹ coming onto its premises and engaging in College-related activities. This document states the College's policy on identifying and preventing potential harm to children and adults at risk when they are in contact with College staff, Fellows, workers, volunteers, apprentices or students. It also outlines the procedures for raising and dealing with concerns.

2. Safeguarding defined

2.1 Safeguarding vs Pastoral care

Safeguarding and *Pastoral care* are interconnected terms and it is therefore important for all members of Homerton College to understand these concepts and why it is important.

Safeguarding can take different forms according to its context. It is useful to consider safeguarding with a 'small s' and a 'capital S'. Safeguarding with a 'capital S' is safeguarding that meets the requirements of Section 42 of the Care Act 2014 or Section 47 of the Children's Act 1989 (2004) and would trigger a formal safeguarding enquiry coordinated by the local authority. Safeguarding with a 'small s' is the kind that aims to protect those at risk of harm and ensure their wellbeing. It is no less important, acts as an early intervention to avoid escalation and is likely to be the most common form of safeguarding activity the College encounters. Many people with physical and/or mental health problems who may have care and support needs can be vulnerable and although they may not be experiencing abuse or neglect as defined under legislation, they nonetheless need a coordinated Pastoral care approach.

Safeguarding focuses on preventing harm and protecting vulnerable individuals from abuse, while *pastoral care* centers around providing holistic support and nurturing to foster the overall well-being and development of individuals within a community or institution and includes the provision the College makes to ensure the physical and emotional welfare of students and employees. Both safeguarding and pastoral care are essential aspects of creating a safe and supportive environment for all members involved.

While the two concepts differ in their primary objectives, they are closely related in practice. *Pastoral care* plays a significant role in identifying and addressing the well-being of individuals, and it can be instrumental in recognizing and responding to safeguarding concerns. Effective pastoral care systems can serve as a crucial component of an organisation's overall safeguarding efforts.

2.2 Homerton College Wellbeing Team and wider Pastoral Support Team

Homerton students are all supported by the Wellbeing Team and wider Pastoral Support Team. The Wellbeing Team includes the Deputy Senior Tutor, the Wellbeing Lead and Safeguarding Coordinator, the Student Health Advisor, Wellbeing Counselling Consultant, College Counsellors and the Wellbeing Assistant.

¹ For the purposes of this policy, a *child* is defined as any person under the age of 18 and therefore not legally an independent adult. Particular care should be afforded to a child under the age of 16. An *Adult at Risk* can be understood as any adult who is deemed to be at risk within a specific circumstance at a specific time, it does not mean the individual is at risk all the time in every circumstance.

Additional pastoral care is also provided by members of the wider Pastoral Support Team such as the student's Tutor, the Senior Tutor, the Postgraduate Tutor, Tutorial Office and the Porters' Lodge. Our student welfare teams also play an important role in providing peer support to any students who feel they need help or advice.

Every student is an individual, and may seek different types of support for specific times in their student life. The information on our [website](#) shows the range of help available and who to contact.

See Appendix A to this policy for a summary of various definitions.

3. Aims of the policy

Homerton College encounters children and adults at risk in a variety of settings, including through its teaching and research activities, as well as through its outreach programs. This policy does not discourage such activities in any way. Instead, it aims to support them and to offer assurances to those engaged in the work of the College that, through its implementation, the College seeks to protect children and adults at risk and keep them safe from harm when in contact with the College's employees, Fellows, volunteers, students or representatives (whether acting in a paid or unpaid capacity). It is also intended to safeguard the interests of employees, Fellows, volunteers, students and anyone who works on behalf of the College and who comes into contact with children or adults at risk.

The policy aims to:

- Promote and prioritise the safety and wellbeing of children and adults at risk.
- Raise awareness that everyone who comes into contact with children/adults at risk (and their families) has a role to play.
- Provide assurance to parents, carers and other parties that the College takes reasonable steps to manage risks and keep children and adults at risk safe.
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters.
- Put in place proportionate safeguards to prevent the employment of individuals in work with children and/or adults at risk where they have been barred by the DBS or are deemed by the College to pose an unacceptable risk to vulnerable groups.
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with College staff, Fellows, students, apprentices or volunteers, whether the harm has taken place on College premises or not.
- Ensure all staff are able to reassure victims of abuse that they are being taken seriously and will be supported.
- Manage effectively the risks associated with activities and events involving children and adults at risk.

4. Scope

The College's Fellows, employees, workers, volunteers, students or anyone working on behalf of the College (in a paid or unpaid capacity) are subject to this policy.

The policy covers all events and activities organized by those working on behalf of or representing the College, as well as official events and activities organized by its students. Such activities include Open Days, applicant visits and interviews, the interactions between students

and the College Nurse, the College Wellbeing Lead, and other Pastoral Leads, and visits from members of the public.

It is expected that external bodies using the College's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities.

5. Roles and Responsibilities

5.1 Safeguarding Officer and Deputies

The College's designated Safeguarding Officer and Deputies are respectively: the Bursar; the Senior Tutor (for student matters); and Head of HR (for employee matters).

The Safeguarding Officers are responsible for:

- Implementing, promoting, reviewing and updating the Children and Adults at Risk Safeguarding Policy.
- Dealing with any reported suspicions and allegations of abuse of children or adults at risk within the College including investigating and/or appointing an investigating officer.
- Providing appropriate information when making referrals to external agencies (such as Social Services or the Police) in all cases of suspected abuse of children or adults at risk.
- Identifying roles within the College for which a DBS check is required, with the responsibility for carrying out the checks delegated to the Head of HR.
- Undertake and ensure appropriate training by:
 - engaging in training to ensure that their own knowledge is kept up to date;
 - ensuring that appropriate information is available, and appropriate training is carried out by members of the College who in the nature of their role will come into contact with adults at risk and children, such roles to be identified by the Safeguarding Officers
- Reporting annually to the College Council on matters concerning the protection of children and adults at risk and on the operation of the College's Safeguarding Policy.
- Ensuring regular independent audits of the safeguarding policy and processes.
- Appoint investigators to look into incidents reported, or a committee to deal with complex safeguarding issues where it is not sufficiently serious to report to authorities but potentially harmful to students.

5.2 Safeguarding Co-Ordinator

In addition to the Safeguarding Officers, the Safeguarding Co-Ordinator will also be the initial point of contact where any allegations of abuse against children and adults at risk are raised. The College Wellbeing Lead acts as the designated Safeguarding Co-Ordinator. This is particularly important where a number of seemingly minor issues may collectively give rise to a more substantial concern.

The Safeguarding Co-Ordinator will:

- Share reported concerns with the Safeguarding Officers to take decisions on next steps and actions.
- Ensuring that those involved in any case are appropriately supported.
- Logging all concerns in the Safeguarding Log, in line with the College's Data Protection Policy, escalating concern to the Safeguarding officers when investigation is warranted.

5.3 The Safeguarding Working Group

The Council appointed a Safeguarding Working Group, consisting of the Safeguarding Officer and Deputies (i.e the Senior Tutor, the Bursar, the Head of Human Resources), and the Safeguarding Co-Ordinator (Wellbeing Lead).

The Working Group meet monthly and, in addition to the duties as outlined in points 5.1 and 5.2 above, will:

- Oversee the College's day-to-day Safeguarding responsibilities and report to Council as necessary;
- Ensure the implementation of a system which enables documentation and reporting of frequency and severity of the safeguarding matters;
- Review any live safeguarding cases.

5.4 Senior Managers, Senior Officers and Heads of Department

They are responsible for:

- Promoting the importance of safeguarding within their department
- Reviewing their department activities and follow the Children and Adult at Risk Safeguarding risk assessment process when required.
- When leading a recruitment campaign, identify whether individuals recruited or involved in an activity or event require a DBS check or basic disclosure and, where applicable, liaise with HR to ensure that this is carried out.

5.5 Individual responsibilities

Staff, Fellows, students and volunteers working with children and adults at risk within the College should be familiar with this policy. In addition, they should, wherever possible, conduct themselves in accordance with the Code of Practice set out in Appendix B. This provides guidance on acceptable and desirable conduct to protect both children and adults at risk who come onto College premises to study and to visit, and those working with them.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or adults at risk is required to report this immediately to the Safeguarding Co-Ordinator or Officers. See Section 6 of this Policy.

6. Risk management and implementing safe practices

6.1 Awareness and training

It is the responsibility of Senior Managers, College Officers and Heads of Department, in liaison with the HR Department, to:

- Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College is made aware of the existence of this policy and asked to familiarize themselves with the contents as part of their induction.
- Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College who engages in a *regulated activity* completes safeguarding training, together with any additional training that may have been identified by any relevant risk assessment processes.
- Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College, not involved in regulated activity, but for whom the Safeguarding Officer deems it appropriate, completes safeguarding training.

- Record and monitor the safeguarding training undertaken by those working on behalf of the College in their area.

6.2 Risk Assessments

The Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks. The Children and Adults at Risk Assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department/institution):

- Recruitment to a new or existing post which involves working with children and/or adults at risk.
- The commencement of new activities or events involving or potentially involving children and or adults at risk.
- Changes being made to activities or events involving or potentially involving children and or adults at risk.

The risk assessment should:

- Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised.
- Consider if there will be children and adults at risk present.
- Consider whether any children or adult at risk have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties.
- Identify any potential areas for harm.
- Evaluate the risks.
- Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented.
- Identify those situations that would require a DBS check.

It is the responsibility of the relevant Head of Department, Fellow or College Officer to ensure that:

- A risk assessment is undertaken for each regulated activity (the assessment should consider how the risks identified can be minimised or eliminated, outline the local processes for reporting concerns, take account of health and safety considerations and record training requirements).
- Completed risk assessments are made available to employees, Fellows, workers, volunteers or students who are involved in the activity.
- The implementation and review of actions identified within a risk assessment is undertaken in a timely manner.

Completed risk assessments should be retained by departments whilst an activity/event is ongoing and for five years after it has ceased (or the risk assessment has been superseded). Where an activity is ongoing but unchanged, departments should review the risk assessment on a regular basis to ensure that the measures put in place are still relevant and appropriate.

A template risk assessment is provided as Appendix C.

6.3 Recruitment and Disclosure and Barring Service (DBS) checks

DBS checks will be undertaken when recruiting or appointing to a role deemed to require a standard or enhanced check. The Safeguarding Officers will advise Heads of Department, from

time to time, on which operational roles require a check as determined by the Disclosure and Barring service, or for those roles considered to be engaged in regulated activity in relation to adults at risk as defined by the relevant legislation (see Appendix A for a definition of regulated activities). The government provides a helpful tool to check eligibility for a standard or enhanced check. This tool can be found at: <https://www.gov.uk/find-out-dbs-check> DBS checks will be renewed at regular intervals, usually every three years.

The HR Department will undertake DBS checks, as well as other pre-employment checks as required; these will include checking the accreditation of anyone employed by the College as a healthcare or psychotherapy professional such as a Counsellor or Nurse, and seeking references from recent previous employers, which may result in findings relevant to the fulfilment of the college's safeguarding duties: any such findings will be shared with the Safeguarding Officers.

In liaison with the relevant authorities, the Safeguarding Officer will refer someone to the DBS if they:

- Have had their employment with the College terminated because they harmed someone;
- Have had their employment with the College terminated or job role limited because they might have harmed someone; or
- Would have had their employment with the College terminated for either of these reasons, but they resigned first.

6.4 Safeguarding Code of Practice

When working with children and/or adults at risk, College staff, students and volunteers are expected to take account of the guidance attached as Appendix B in the way they conduct themselves.

7. Arrangements for supporting students under the age of 18

The College is not able to take on the authority, rights and responsibilities of parents in relation to their children, and it will not act in loco parentis in relation to students who are under the age of 18 years. Residential accommodation offered by the College is generally intended for the use of adults. In the rare circumstances that a student, under the age of 18, is matriculated and becomes a student member of College, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:

- Teaching and pastoral support. The format of teaching and pastoral support when under-18s are involved will seek, insofar as their educational experience would not be compromised, to avoid singleton tutorials or supervisions. It is recognized, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary. Should this be the case, seek to either keep the door open or book a member of Tutorial Office staff to sit in on meetings.
- IT facilities. Access and terms of use for the internet by under-18s for study will be as for all students.
- Alcohol and student arranged activities. Access to alcohol by undergraduates under the age of 18 at any activity which is signed off by or known to the College will not be permitted. It is acknowledged that the individual student must also bear responsibility for his or her actions at any event. Safeguarding issues will be covered at the sign-off stage with student organisers. Consideration should be given to any risk posed by students over 18 at these events.
- The College Bar. The College has effective systems and practices to counter underage

- drinking and no student under 18 is permitted to work in the College bar.
- Liaison with Faculties and Departments. The College will inform/consult with the relevant Faculty or Department as early as possible about any student who will be under the age of 18 who is being admitted so that the University can put appropriate measures in place to meet its safeguarding obligations.

It is expected that *external bodies using the College's premises or facilities* for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities. Residential accommodation for visitors or groups of visitors under the age of 18 will need to be approved by the Safeguarding Working Group and a Risk Assessment needs to be completed by the relevant external body and/or College Officer overseeing the visit for approval by the Safeguarding Working Group.

8. Raising a concern or allegation of abuse

Concerns for the safety and wellbeing of children and adults at risk could arise in a variety of ways and in a range of situations. For example, a child/ adult at risk may report or show signs of abuse, someone may hint that a child/adult at risk is or has been subject to harm, or that a colleague is an abuser, or someone may witness abuse.

In the event that disclosures of allegations, or suspicions, of inappropriate behaviour are made to you, remain calm, avoid expressions of anger or upset and ensure that the person knows you are taking them seriously. Reassure them that they are right to have told someone, but do not touch them (for example by putting an arm round them). Be supportive but DO NOT promise confidentiality. A duty of care obligates the College to act on information where a safeguarding issue has been identified and this takes precedence over the need for confidentiality. Explain that, in order that the allegation can be addressed you will have to talk to other people about it, and explain who you will talk to.

Any person involved in the work of the College (Fellows, employees, workers, volunteers, students or anyone working on behalf of the College in a paid or unpaid capacity) is encouraged to raise a concern or allegation of abuse. It is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations should follow the guidelines as set out in the flowchart attached as Appendix D, and summarized below:

In emergency circumstances: consider the urgency of the situation, in the event there is a risk of immediate serious harm to a child or adult at risk, the emergency services should be contacted via 999. You can also contact the Porters Lodge for immediate assistance. Anybody can make a referral in these circumstances. The relevant Safeguarding Officer should then be notified of the case and will need to determine whether to refer serious cases to the relevant authorities within one working day. In such cases, a criminal investigation may follow. The Safeguarding Officer will inform the Safeguarding Co-Ordinator to ensure it has been appropriately logged.

Where the situation is not an emergency. Where a child or adult at risk discloses alleged abuse, or a member of the College suspects abuse which is not deemed to be an emergency, this should be referred immediately to the Safeguarding Officers or Safeguarding Co-Ordinator who will consider what action is required. This can either be done by completing the relevant form (see Appendix D) or following the link on the [website](#). Such a referral should be made even where concerns are seemingly minor; in some instances it is a pattern or range of minor incidents which, when taken together, amount to a more significant concern requiring investigation. It is therefore vital that the Safeguarding Officers are privy to all concerns as they arise.

Referrals can therefore be channeled as follows: by speaking to their line manager/Tutor, or any senior member of the College who will escalate matters to the Safeguarding Co-Ordinator and/or Officers as a matter of course. Concerns or allegations can also be made directly to the Safeguarding Co-Ordinator or Safeguarding Officers. The Safeguarding Officer will inform the Safeguarding Co-Ordinator to ensure it has been appropriately logged.

Where there are concerns about abuse, further advice and guidance can be sought from the NSPCC Helpline on 0808 800 5000 or Childline on 0800 1111. However, this should not take precedence over the two-stage process, as above.

9. Procedure for dealing with suspicious or allegations of abuse

This policy requires that any suspicions and allegations involving harm to children and/or adults at risk are referred to the designated Safeguarding Officers (directly or via the Safeguarding Co-Ordinator), to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and sensitively. It will also ensure that appropriate steps are taken as a result of any investigations, which may include contacting the police, social services and/or fulfilling the legal duty to refer information to the DBS as required. Consideration will also be given to whether it is necessary to take further action through the relevant internal procedures. This may include invoking the relevant Disciplinary procedure.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and adults at risk from abuse and the need to protect staff, Fellows, students, and volunteers from false or unfounded accusations. Any individual who raises a child protection concern will not be subject to any adverse or detrimental treatment.

Dealing with emergency situations

The College is not expected and should not attempt to investigate suspicions of abuse independently. Where a suspicion has been reported to the Police and/or relevant authority and needs to be investigated by the relevant authority, it may be necessary for the College to do one or more of the following:

- move the victim of an alleged safeguarding breach to a safe place;
- suspend the individual(s) about whom an allegation or suspicion has arisen;
- prevent the individual(s) about whom an allegation or suspicion has arisen from engaging in any regulated activities.

Serious safeguarding breaches may constitute gross misconduct under the College's disciplinary policy and may lead to summary dismissal following the relevant College procedures.

Dealing with other concerns raised

Once a suspicion or allegations of abuse had been reported to the Safeguarding Officer(s) or Safeguarding Co-Ordinator (this can also be done anonymously using the form included in Appendix D), they will review the information provided. An investigator will be appointed as appropriate. The following steps will be followed:

- The Safeguarding Co-Ordinator or a Safeguarding Officer will meet with the person who raised the concern within 5 working days to verify the information provided and to clarify next steps. A decision regarding suspension of the alleged offender during the investigation process should be taken and enacted at this point.
- The Safeguarding Officer and/or relevant deputies will review and investigate the suspicions or allegations, or appoint an investigating officer as appropriate. This will involve individual

meetings with the person(s) who raised the allegations, alleged victim(s) and/or any other witnesses identified. A meeting with the alleged offender will also be arranged. In the event that complainants and/or witnesses are not willing to provide their names, information will be redacted in such a way to ensure anonymity as basis for any investigation meetings with the alleged offender.

- Various outcomes can be considered following the investigations, including but not limited to invoking the relevant disciplinary procedure, barring an individual from entering College premises, discontinue access to any College facilities and/or accommodation, and discontinue any formal and/or informal engagement.
- The complainant and/or victim will be informed of the outcome in writing.

10. Relevant College Policies

This policy should be read in conjunction with the range of College's policies, regulations and rules which cover related matters, including those dealing with:

- a) Mutual Respect Policy
- b) Recruitment, Induction and Training practices
- c) Equality and Diversity Policy
- d) Data Protection Policies and Guidelines
- e) Student Confidentiality
- f) Whistleblowing
- g) Staff-Student Relationships
- h) IT guidelines
- i) Health and Safety
- j) Lone Working
- k) Complaints and grievance procedures
- l) Disciplinary / Codes of Conduct
- m) Visitor protocols
- n) PREVENT guidelines

The College's Statutes and Ordinances, as well as a Collection of Student Rules including Regulations, as well as College policies relating to staff and HR matters can be found on the College website.

11. Relevant legislation

The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Care Act 2014
- Children's Act 1989 (2004)
- The Police Act 1997
- Protection of Children Act 1999
- Management of Health and Safety at Work Regulations 1999
- The Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (as amended by Protection of Freedoms Act 2012)

- Equality Act 2010
- Education Act 2011
- The Counter-Terrorism and Security Act 2015
- General Data Protection Regulation 2018
- Worker Protection (Amendment of Equality Act 2010) Act 2023

Organisations such as the [Cambridgeshire County Council Safeguarding Teams](#), [NSPCC](#) and [Cambridgeshire local safeguarding board](#) have a range of useful information on their web pages.

Policy change history		
Date	Summary of Changes	Date of next review
September 2023	New policy to replace the Children and Adults at Risk Policy July 2017	September 2024
October 2024	Update to make reference to new legislation: Worker Protection (Amendment of Equality Act 2010) Act 2023	November 2026

This policy is not contractual and may be amended from time to time, as necessary, in light of any changes in legislation or operational requirements.

Children and Adults at Risk Safeguarding Policy

Appendix A – Definitions

Safeguarding: is primarily concerned with protecting individuals, especially vulnerable populations such as children, young people, and adults at risk, from harm, abuse, neglect, or exploitation. It involves taking preventive measures and implementing procedures to create a safe environment and prevent potential risks or dangers. Safeguarding encompasses legal and regulatory frameworks, policies, and protocols that organizations and institutions must follow to ensure the safety and welfare of their members. In an educational context, safeguarding might involve training staff to recognize signs of abuse, setting up appropriate reporting mechanisms, conducting background checks for employees, and implementing safety procedures for activities involving children and vulnerable individuals.

Pastoral Care: is more focused on the holistic support and well-being of individuals within a community or institution. It involves providing emotional, social, and spiritual support to promote the personal development and welfare of individuals. Pastoral care is often centered around building strong relationships, offering guidance, and providing a nurturing environment where individuals feel supported and valued. In an educational context, pastoral care includes supporting students through their academic journey, helping them with personal and emotional challenges, offering counseling or mentoring services, and promoting a positive school climate where students can thrive both academically and emotionally.

Safeguarding Co-Ordinator : The College Wellbeing Lead. The safeguarding lead is responsible for receiving all safeguarding concerns (if this is in appropriate then the concerns should be passed to a Safeguarding Officer) and logging all concerns in the Safeguarding Log and escalating concern to the Safeguarding officers when investigation is warranted.

Safeguarding Officers: The Bursar, Senior Tutor and Head of HR. They take the role ensuring investigations and concerns are acted upon including appointing an appropriate investigator in formalised concerns. The safeguarding officers will ensure College policy is in place and up to date, annually reviewing the safeguarding policy and reporting to The Council. They are also charged with ensuring regular independent audits of the safeguarding policy and processes.

Safeguarding Log: This is a log of the anonymous and non-anonymous safeguarding concerns. The reason concerns are logged is to keep a record of evidence. This record will include anonymous informal concerns as to build evidence of behavioural patterns of an individual and highlight if further action is needed to be taken based upon multiple informal concerns. This is a standard part of safeguarding documentation used as a tool for the Designated Safeguarding Co-Ordinator to keep a track of the safeguarding concerns reported and to have oversight (The National Council for Voluntary Organisations, 2021).

Child / Children: for this policy's purposes, a 'child' refers to anyone under the age of 18 and therefore not legally an independent adult. Particular care should be afforded to a child under the age of 16.

Adult at Risk: This can be understood as any adult who is deemed to be at risk within a specific circumstance at a specific time, it does not mean the individual is at risk all the time in every circumstance.

Defined in the Care Act 2014 as a person over the age of 18 who is:

- Someone who needs care and support
- At risk of experiencing abuse or neglect
- Someone who can't protect themselves from harm or exploitation.

Vulnerable adult: the term has recently been amended as it was felt to be inappropriate to label an adult as vulnerable solely due to their circumstances, age or disability. In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving one of the following services:

- Health care;
- Relevant personal care;
- Social care work;
- Assistance in relation to general household matters by reason of age, illness or disability;
- Relevant assistance in the conduct of their own affairs; or
- Conveying (due to age, illness or disability in prescribed circumstances)

Significant and Imminent risk: Where there is immediate danger or physical injury emergency services should be contacted immediately.

Abuse: can be physical, sexual, psychological/emotional, financial/material or professional. It can also arise from neglect. The Care Act 2014 identifies ten types of abuse. These are:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Discriminatory abuse
- Neglect and acts of omission
- Self-neglect
- Modern slavery
- Organisational or institutional abuse

The Care Act 2014 also states that abuse and neglect can be caused deliberately or unintentionally.

Regulated activities in relation to children:

Regulated activities are those activities which people who have been barred by the DBS are prohibited from undertaking. A regulated activity in relation to children comprises:

- a. unsupervised activities: teaching, training, instructing, caring for or supervising, or providing advice/guidance on wellbeing, provide personal care, or driving a vehicle only for children;
- b. working for a limited range of establishments, with opportunity for contact e.g. schools, children's homes, childcare premises;
- c. Relevant personal care; or
- d. Registered childminding; and foster-caring.

Work under (a) or (b) is considered regulated activity only if done **regularly**.

All members of the Undergraduate Admissions Team are considered to be regularly engaged in regulated activities with children under 18 as defined by the relevant legislation.

Full definitions of regulated activity in relation to children, including definitions of regularity, can be found [here](#)

Regulated activity in relation to adults at risk:

Regulated activity in relation to adults identifies activities provided to any adult which, if any adult *requires* them, will mean that the adult will be considered at risk at that particular time. There is no longer a requirement for a person to carry out regulated activities a certain number of times before they are deemed to be engaging in regulated activity in relation to adults. Whenever a person engages in one or more of the activities set out below in relation to any adult, they are deemed to be engaging in regulated activity and that adult is deemed to be at risk at that time:

- a. Provision of health care (whether physical or mental, including palliative) by any health care professional who is regulated by General Medical Council, General Dental Council, Nursing and Midwifery Council, Health Professions Council;
- b. Providing psychotherapy and counselling of a professional nature which is related to health care the adult is receiving from, or under the direction or supervision of a health care professional;
- c. Providing first aid, when any person administering it is doing so on behalf of an organization established for the purpose of providing first aid (e.g. Red Cross);
- d. Providing personal care as a result of physical or mental illness, including physical assistance with eating or drinking, going to the toilet, washing, bathing, dressing etc., or supervising, training or providing advice/guidance to an adult to undertake these activities themselves where they cannot make the decision to do so unprompted;
- e. Providing social work;
- f. Assisting with general household matters (e.g. managing a person's money, paying their bills, shopping on their behalf);
- g. Assisting in the conduct of a person's affairs (e.g. undertaking lasting or enduring power of attorney for an adult under the Mental Capacity Act 2005, being an independent mental health advocate etc.);
- h. Conveying (e.g. driving a person specifically for the purpose of conveying them to and from places to receive care as detailed above).

The roles of College Nurse, Counsellor, and Porters or others providing emergency first aid are considered to be engaged in regulated activity in relation to adults at risk as defined by the relevant legislation).

Full definitions of regulated activity in relation to adults can be found [here](#).

Children and Adults at Risk Safeguarding Policy Appendix B – Code of Practice

When working with children and/or adults at risk, College staff, Fellows, students and volunteers are expected to take account of the guidance below in the way that they conduct themselves.

Safeguarding of children and adults at risk

You should:

- Treat everyone within the College community with respect;
- Provide an example of good conduct for others to follow;
- Ensure you have completed any required training and that you know what you should do if a child or adult at risk makes a disclosure to you;
- Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in;
- Give due regard to cultural difference;
- Be alert to and tackle inappropriate behaviour in others, including peer-to-peer behaviours. Abusive behaviour such as bullying (including cyber-bullying), ridiculing or aggression should not go unchallenged;
- If you have to give feedback, take care that it is not unnecessarily negative;
- Avoid being in a situation where you are alone with a child and make sure that others can clearly observe you;
- Take care that your language is not open to sexual connotation;
- Report any suspicions promptly and confidentially to your Head of Department, or in the event that the suspicions/allegations involve that person or they are unavailable, to the Safeguarding Officer;
- Deal with information sensitively and be aware that special caution may be required in moments when discussing sensitive issues with children and adults at risk.

You should not:

- Engage in, or allow, any form of unnecessary physical contact. This would include doing personal things for a child or an adult at risk that they can do for themselves. Where the person is disabled, tasks should only be carried out with the full consent of the individual, (or their parent);
- Use inappropriate language, or allow others to use it without challenging it;
- Allow yourself to be drawn into inappropriate attention-seeking behaviour;
- Show favouritism to any individual;
- Rely on the College's good name to protect you;
- Engage in any physical sexual relationship with a person to whom you are in a position of trust, even if they give their consent;
- Give your personal contact details (such as personal phone number, home address, email, Skype address or other communication routes) to a child or adult at risk, or use any unofficial route to communicate with a child or adult at risk;
- Interact in a personal capacity with children or adults at risk outside of the regulated activity, including through any form of social media, for example, by becoming 'friends' on Facebook;
- Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on;
- Allow personal preconceptions about people to prevent appropriate action being taken;
- Accept gifts which could in anyway be considered a bribe or inducement to enter into a relationship or give rise to an allegation of improper conduct against you;

- Take photographs, or make other recordings of at children or adults at risk without specific written consent of the individual, or someone with parental responsibility for that individual.

You should seek advice from your Head of Department if:

- You suspect a relationship is developing which may be an abuse of trust;
- You are worried that a child or adult at risk is becoming attracted to you or a colleague;
- You think a child or adult at risk has misinterpreted something you have done or said;
- You have had to physically restrain a child or adult at risk to prevent them from harming themselves, another person or causing significant damage to property;
- A child or adult at risk tells you that they are being abused, or describes experiences that you consider may be abuse;
- You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

Additional guidance for online interactions

Technical considerations

- When choosing a platform for an online session, platforms approved for university use (e.g. Microsoft Teams/Zoom) should be used wherever possible.
- Platforms chosen should have the ability to require a private link or password to enter to ensure that only designated participants are able to access the session.
- Platforms should not enable participants to view personal data of contributors or other participants.
- Platforms should provide the option for managing individuals to remove posts made in online 'chat' functions that contain personal or inappropriate information, and remove/ban individual participants from the session. The ability to have all posts moderated by Homerton staff before being made public to all participants is desirable.
- Video and audio functions should only be enabled for those that are actively expected to contribute to a session in this way, and where possible should be limited to only Homerton affiliated individuals or invited contributors. (i.e. not general participants). Session leaders should have the ability to mute the audio and video of participants and contributors.

General considerations

- Login information for sessions should only be shared with participants, and not be distributed on social media.
- Contributors should not log in to sessions using personal accounts.
- At least two designated College representatives should be present to lead and monitor the session. At least one of these should have a DBS check and be safeguarding trained where possible.
- Monitoring staff should check the appropriateness of verbal interactions and comments/questions in text chats at all times.
- Inappropriate or abusive content of any kind should be reported immediately to the College Safeguarding Officer and service provider once the individual concerned has been removed from the session. Screenshots of the content in questions should be quickly taken before removing the content.
- If at any point the number of College representatives available falls below two, the session should be ended. 1-2-1 interactions of this kind with under-18 year olds that are not members of the College are prohibited.
- Participant audio should only be enabled if necessary for the session to run in the intended manner. If participants under 18 years of age are expected to contribute to a session with audio

and/or video elements, permissions should be sought. Additional consent should also be gained if the session is intended to be recorded or distributed in any way.

- Staff engaging in online sessions should ensure that their background does not contain any personal or inappropriate content.
- If contributors intend to share their screens at any point, they must ensure that no personal or inappropriate content is able to be broadcast before doing so.

**Children and Adults at Risk Safeguarding Policy
Appendix C – Risk Assessments**



College Activity or Event:	
Department/Functional Area	

Section A

Please answer the questions below, which are designed to help you identify some of the types of the risks/hazards you should include in Section B.

1. Please provide an overview of the nature of the activity or event which involves contact with children and/or adults at risk. Please include who the contact is with and the nature, length, frequency of the contact.	
2. Are there children and/or adults at risk taking part in the activity or event who are particularly at risk? For example, those with disabilities, behavioural difficulties, allergies or on medication.	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please detail these within Section B.
3. Will there be any occasions where employees/ workers/ volunteers will not be supervised, observed or accompanied by others?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please detail these occasions within Section B and consider whether working practices can be changed to minimise or eliminate these.

<p>4. Does the environment that the activity or event is taking place in pose any particular risks? For example, the children or adults at risk having possible contact with chemicals in a laboratory.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please detail these within Section B and consider whether working practices can be changed to minimise or eliminate these.</p>
<p>5. Are there any other aspects of the nature, length or frequency of contact that individuals will have with children and/or adults at risk which pose particular risks?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please detail these within Section B.</p>
<p>6. Does this activity or event require any College employees, temporary workers, volunteers or students to have a DBS check?</p>	<p><input type="checkbox"/> Yes –enhanced DBS with children’s barred list check. <input type="checkbox"/> Yes –enhanced DBS with adults’ barred list check. <input type="checkbox"/> Yes –enhanced DBS with children and adults’ barred lists check. <input type="checkbox"/> Yes – enhanced DBS with no barred list check <input type="checkbox"/> Yes – standard DBS check <input type="checkbox"/> No</p> <p>If yes, please provide details in Section B of how the activity/event means that the eligibility criteria for the DBS check indicated is met and ensure that one of your control measures is the completion of a DBS check.</p> <p>If no, consider in Section B whether any direct contact with children/adults at risk as a central part of this role gives rise to risks which can only be managed or can be best managed by carrying out a basic disclosure for particular individuals involves with the activity/event.</p> <p>Please note: Teaching, training, instructing, caring for or supervising a 16- or 17-year-old’s employment (which includes work experience) is not regulated activity and a DBS check may not be requested. A DBS check may only be required for work experience students under 16 in the rare event that the same person is teaching, training, instructing, caring for or supervising them whilst unsupervised on a frequent/intensive basis.</p>

Section B

Section B incorporates key elements of a standard risk assessment. Please complete the table below for any risks or hazards relating to the activity/event you are leading, either those identified through completing Section A of this form or by other means.

List the significant risk(s) or hazard(s) ²	Describe what you could reasonably foresee could go wrong e.g. how an accident, incident or health condition could arise.	Is the risk high, medium or low in impact and likelihood	Please list the existing and/or intended control measures which will reduce the likelihood or impact of the risk/hazard occurring. State who will carry them out and by when ³	Is the risk high, medium or low in impact and likelihood after the control measure has been put in place?	Control measure implemented? Please include by whom, when and if/when this will need to be reviewed/repeated

² A list of hazards is provided below to help you, but this may not be exhaustive. If any of these hazards can be eliminated altogether, or can be reduced at source by making an inherent change then we must consider doing so. Hazards in bold will also need an additional, more technical assessment on a specialist form.

High or low temperatures
Ionising radiations
 Magnetic fields
 Falling objects

High pressures
Lasers
 Machinery hazards
 Collapsing structures

Chemical hazards
 Sharp objects
 Electricity
 Flooding

Biological hazards
Dusts
Manual Handling
 Slips, trips and falls

Genetically Modified Organisms
 Work at heights
 Noise
 Asphyxiant gases

Animal houses
 Vibration
Flammable gases

³ When deciding on suitable control measures, you should ensure that you are complying with all relevant University policy and guidance documents, and that you have considered the hierarchy of control measures. In order to comply with legislation, we must also take all steps which are 'reasonably practicable' to reduce risk. This means that we should take all steps which are (in terms of time, cost and trouble) reasonable in relation to the reduction of risk achieved. Examples include:

- Emergency or first aid procedures;
- Training on, and dissemination of, relevant policies, procedures and processes;
- Screening checks (e.g. DBS checks, basic disclosure, health assessment or health surveillance);
- Providing required and suitable personal protective equipment (PPE).

Name and position of the person who completed the form	Signature	Date	Name and position of manager/supervisor	Signature	Date

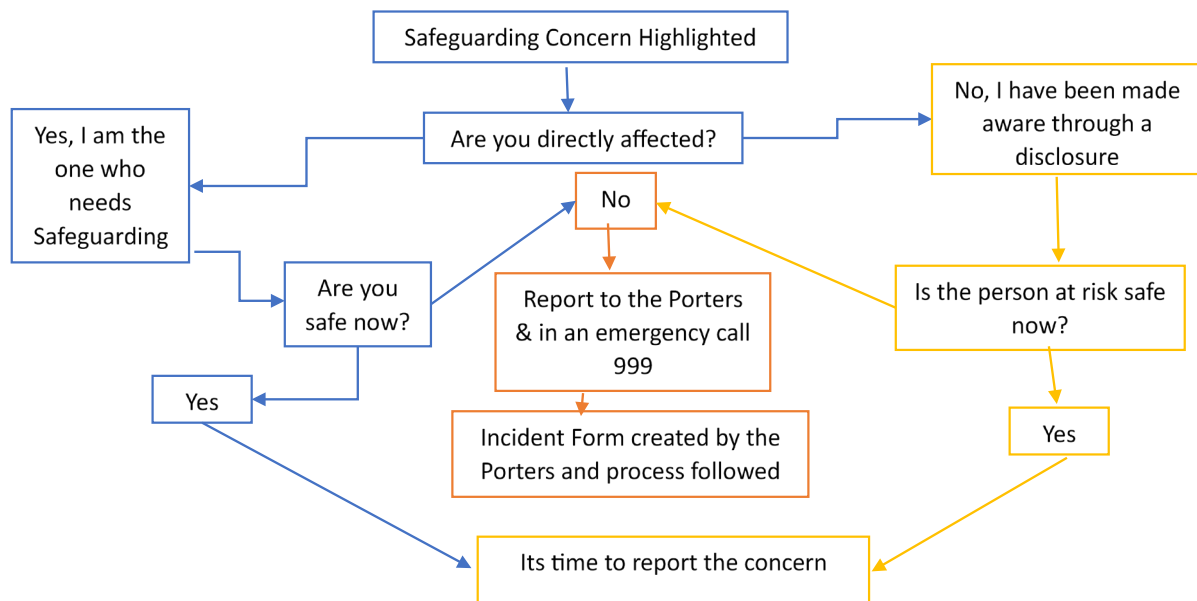
Please note: Where an activity is ongoing but unchanged, departments should review the risk assessment on a regular basis to ensure that the measures put in place are still relevant and appropriate. It should also be reviewed if there are changes to the activity/event or processes relating to it, or if an incident/accident takes place. Completed risk assessments should be retained by departments/institutions whilst an activity/event is ongoing and for five years after it has ceased (or the risk assessment has been superseded).

Reviewed by (name)	Signature	Date	Indicate changes here ⁴

⁴ If changes are extensive, you will need to complete a whole new form, or attach a written amendment. If there are no changes, indicate so.

Children and Adults at Risk Safeguarding Policy Appendix D – Raising and Dealing with Concerns

Any person involved in the work of the College (Fellows, employees, workers, volunteers, students or anyone working on behalf of the College in a paid or unpaid capacity) is encouraged to raise a concern or allegation of abuse. It is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations should follow the guidelines as set out in the flowcharts below, and by using the forms D1 (anonymous) or D2 (non-anonymous) attached.



Informal Route Options: (these can always be escalated into formal complaints later if you wished)

- 1) Anonymous Feedback- Requiring you to log your safeguarding concern with the Safeguarding Co-Ordinator but remain anonymous on the log. This would have the respondent name and the concerning behaviour. It may be used as supporting evidence to other concerns.
- 2) Non-Anonymous Report - Requiring you to log your safeguarding concern with the Safeguarding Co-Ordinator. This would name you, the respondent, and the concerning behaviour. To do this informally would mean you specifically ask that further action was not taken forward based on the log alone. It may be used as supporting evidence to other concerns.

Formal Routes:

- 1) Non-Anonymous Report - Requiring you to log your safeguarding concern with the Safeguarding Co-Ordinator. This would name you, the respondent, and the concerning behaviour. To do this formally would mean you are specifically asking that further action is taken. What action will be decided by the Safeguarding Co-Ordinator, who may consult with the Safeguarding Officers as to the next steps.

FORM D1: LOGGING A NON - ANONYMOUS REPORT

Your Details:

Your name: Your email:.....

I am a (please circle):

Student Staff Fellow Visitor Other:

Respondent Details:

Name of respondent:.....

They are a (please circle):

Student Staff Fellow Visitor Other:

Complaint Details

Date(s) and Time(s) of the behaviour.....

Description of what happened, please include names, and details of witnesses to your complaint.

Declaration

I understand that the content of this form will be kept confidential, **unless** there is a safeguarding concern. Details may be passed to support structures internally or externally including the police and social care services.

Do you give consent for the respondent to see this complaint? Yes/ NO

Reporters Signature.....

FORM D2: LOGGING ANONYMOUS FEEDBACK TO BE LOGGED

Respondent Details:

Name of respondent/Department:.....

They are a (please circle):

Student Staff Fellow Visitor Other:

Feedback Details

Declaration

I understand that the content of this form will be kept confidential, **unless** there is a safeguarding concern. Details may be passed to support structures internally or externally including the police and social care services.

Do you give consent for the respondent to see this complaint? Yes/ No