

SAFEGUARDING POLICY

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Safeguarding Policy

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1. Overview

- 1.1 Safeguarding describes the steps taken to protect people from harm, including children, adults at risk, students, staff, prospective students, alumni, conference guests, visitors, the general public, and other people who come into contact with the College. While safeguarding principally refers to the steps taken to prevent harm, it also encompasses practices to handle incidents and/or complaints.
- 1.2 The safeguarding of children (as defined in the Children Act 2004) and adults at risk (as defined in the Care Act 2014) involves additional protective measures and procedures, and is subject to additional legislative, regulatory and other external requirements. The College regards the welfare of children and adults at risk as paramount and will endeavour to safeguard their wellbeing, in particular by taking steps to protect them from abuse or avoidable harm.
- 1.3 This policy details the College's governance, procedures and practices for safeguarding in general and for the safeguarding of children and adults at risk in particular.
- 1.4 This policy should be read in conjunction with the University of Oxford's <u>Safeguarding Code of Practice</u> (2015).
- 1.5 This policy should also be read in the context of the Charity Commission guidance Safeguarding for charities and trustees (2021).
- 1.6 This policy has been drawn up with due regard to the Child Protection procedures of the Oxford County Council's Children's Services Division of the Learning and Culture Department, made available through the Oxfordshire Safeguarding Children Board (OSCB), and to the guidance document Working Together to Safeguard Children (2018).
- 1.7 Failure to comply with this policy, or with the requirements of a Safeguarding Risk Assessment, is likely to constitute misconduct under an employee's contract of employment; a breach of the College's student disciplinary code; or cause for a misconduct procedure under the College Statutes.

2. Governance

- 2.1 The Governing Body has collective and ultimate responsibility for safeguarding, as for all of the College's activities. Operational implementation, judgments and oversight are delegated to key individuals as detailed in this policy, but the Governing Body is responsible for setting the policy, for reviewing it regularly to ensure that it is fit for purpose, and for seeking reasonable assurance that adequate controls are in place and that those exercising delegated responsibility are competent to do so.
- 2.2 The Governing Body will review this policy at least annually, or more frequently as needed.
- 2.3 The Welfare Committee exercises more detailed scrutiny of safeguarding activities, and reports to the Governing Body.
- 2.4 The Designated Safeguarding Lead (DSL, who is currently the Bursar), is responsible for the managerial and operational oversight of safeguarding across the College, and has particular responsibilities in the safeguarding of children and adults at risk, as detailed below. The Designated Safeguarding Lead reports to the Principal.

- 2.5 The Designated Safeguarding Deputy (DSD, currently the Academic Registrar) assists the Designated Safeguarding Lead and deputises for them when they are absent.
- 2.6 The Dean is responsible for student discipline. The Dean also has authority to enact certain non-disciplinary safeguarding measures independently of the Designated Safeguarding Lead, where this is necessary for the proper functioning of College or to protect student welfare. These are detailed below and in Appendices C and E of the College Bylaws.
- 2.7 The Senior Tutor is responsible for the College's student welfare provision, working closely with the Academic Registrar.
- 2.8 The Head of Human Resources (or, in their absence, the Bursar) is responsible for employment policies and procedures, and for the College's employee welfare provision.
- 2.9 Of necessity, safeguarding overlaps with multiple other activities, policies and procedures. Although certain safeguarding actions are directly specified in this policy, in other cases safeguarding is ensured via other policies or procedures, including the Health and Safety Policy; Risk Management Policy; Employee Disciplinary and Grievance procedures; Student Academic Disciplinary Procedure; Student Non-Academic Disciplinary Procedure; Student Complaints Procedure; Fitness to Study Policy; Harassment Policy; Sexual Harassment Policy; Staff-Student Relations Policy; Licence to Occupy; Equality Policy; and Student Handbook.
- 2.10 Although specific individuals have responsibilities as set out in this policy, everyone is responsible for safeguarding, and especially for reporting any concerns as detailed below.
- 2.11 The Governing Body is responsible for the leadership and culture of the College. We aspire to a culture that puts safeguarding in all senses at the heart of what we do.

3. Safeguarding Children and Adults at Risk

- 3.1 The College recognises that it has a legal duty to safeguard the welfare of children who come onto its premises or come into contact with its members under the Children Acts 1989 and 2004, and the Health and Safety at Work Act 1974.
- 3.2 Where a College Member occupies a position of trust with regard to children or adults at risk, an improper relationship with a child or adult at risk constitutes an abuse of trust under the Sexual Offences Act 2003.
- 3.3 The College has certain powers, under the Rehabilitation of Offenders Act 1972 to enquire as to the criminal record history of College Members in order to assess any risk to children.
- 3.4 Although the material majority of people who come into contact with the College are neither children nor adults at risk, the College recognises that children and adults at risk do enter the site and otherwise come into contact with the College in a number of circumstances. These include, but are not limited to:
 - 3.4.1 Admissions interviews (whether on-site or virtual)
 - 3.4.2 Outreach activities, both on and off the College site
 - 3.4.3 Students who are under the age of 18 when they arrive at the College
 - 3.4.4 Summer schools run by third parties who rent space from the College (whether commercially or for outreach reasons, including the central University)

- 3.4.5 The children or relatives of College members visiting the site or attending events
- 3.4.6 Employees under the age of 18
- 3.4.7 Students or other members of College whose needs for care or support place them at risk of abuse or neglect as defined in the Care Act 2014
- 3.5 Children under the age of 16 are not allowed onto the site unless accompanied by a responsible adult, except as part of an official and risk-assessed College activity such as an open day. Where a member of College brings a child onto the site (including for organised College activities, such as to attend a social event for staff and families), they will be the responsible adult. For other organised College activities, the responsible adult will be a member of College staff; in the case of activities run by other organisations (e.g. summer schools / school visits) the responsible adult will be a member of staff from the relevant organisation.
- 3.6 For any event or activity where it is reasonably foreseeable that children or adults at risk might come into contact with the College, the Designated Safeguarding Lead will assign a Designated Safeguarding Officer (DSO). This applies regardless of whether primary safeguarding responsibility for the activity lies with the College or with another organisation (e.g. school visits / summer schools).
 - 3.6.1 The Designated Safeguarding Officer for admissions, College outreach activities, school visits, and students under the age of 18 when they matriculate, is the Outreach and Partnerships Manager.
 - 3.6.2 The Designated Safeguarding Officer for official College social events and for summer schools is the Conference and Events Manager.
 - 3.6.3 The Designated Safeguarding Officer for all employment matters is the Head of Human Resources.
- 3.7 In respect of safeguarding children and adults at risk, the Designated Safeguarding Lead is responsible for:
 - 3.7.1 Implementing and promoting this Policy, and providing assurance to Governing Body on controls and compliance
 - 3.7.2 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
 - 3.7.3 Reviewing and approving Safeguarding Risk Assessments
 - 3.7.4 Acting as the College's main contact for the protection of children and adults at risk
 - 3.7.5 Ensuring that the appropriate College members are provided with information, advice and training on the protection of children and adults at risk
 - 3.7.6 Establishing and maintaining contacts with the local Children's Social Care Services departments and Police
 - 3.7.7 Maintaining confidential records of reported abuse cases and action taken

- 3.7.8 Ensuring that any necessary regulatory disclosures are made promptly and correctly
- 3.8 The Designated Safeguarding Officers are responsible for:
 - 3.8.1 Implementing and promoting this policy
 - 3.8.2 Acting as the main contact for their designated activities, for the protection of children or adults at risk
 - 3.8.3 Carrying out and documenting Safeguarding Risk Assessments
 - 3.8.4 Ensuring that those assisting with any College-run designated activity (whether College members or those external to the organisation) are provided with information, advice and training where required
 - 3.8.5 Liaising with external organisations where College does not have primary safeguarding responsibility (e.g. school visits / summer schools)
 - 3.8.6 Ensuring that confidential records of reported abuse cases are reported to the DSL or (in their absence) the DSD
 - 3.8.7 Ensuring adequate ratios of child supervision at all times in accordance with NSPCC guidelines
 - 3.8.8 Escalating any concerns about safeguarding or potential risks, no matter how apparently-trivial, to the DSL.
- 3.9 Any College member whose duties require them to have unsupervised contact with, to regularly care for, to train, supervise or otherwise be in sole charge of children, must complete a Disclosures and Barring Service (DBS) disclosure for the College (irrespective of whether or not they have previously completed a DBS disclosure for another organisation). They will also be required to complete safeguarding training to the appropriate level as detailed below in section 6 of this policy.
- 3.10 Records of DBS disclosures are maintained by the HR department.
- 3.11 Every activity that involves children should be risk-assessed, and the Safeguarding Risk Assessment should consider how the risks identified can be minimized, and should outline the local processes for reporting concerns, as well as paying due attention to relevant Health and Safety considerations. Risk assessments should be checked by the DSL / DSD and a copy filed with the DSL before the activity is undertaken. Copies of the completed risk assessments should be made available to all staff or College members involved in the activity.
- 3.12 Where a student is under the age of 18 when they matriculate, the Designated Safeguarding Officer will conduct a Safeguarding Risk Assessment. The College recognises that anyone under the age of 18, as a matter of law, is a child, and that the College has special duties of care towards a child. However, the College is not *in loco parentis*. The Designated Safeguarding Officer will obtain written permission from the child's parents or guardian that they accept the safeguarding measures that have been put in place.
- 3.13 The Designated Safeguarding Officer will inform all relevant members of College staff of the names of any students under the age of 18, including: all members of the safeguarding team

- (DSL, DSD and DSOs); the Dean; the Senior Tutor; all members of academic staff in the relevant subject(s); the Catering Manager; all members of the College Bar staff; and the Lodge.
- 3.14 If a student is under the age of 16 when they arrive in College, the College will seek appropriate external advice to determine what additional safeguarding measures need to be put in place. The College site is not a suitable residential environment for unaccompanied children under the age of 16.
- 3.15 Line managers must consult the Designated Safeguarding Officer before making an offer of employment to anyone under the age of 18.
- 3.16 Before the College makes an offer of employment to anyone under the age of 18, the Designated Safeguarding Officer will conduct a Safeguarding Risk Assessment with the employee's line manager and will agree any modifications to working practice, which will be communicated to the employee and to any other relevant members of staff who need to comply with these modifications.
- 3.17 The College will not employ anyone under the age of 18 in a role where it is not possible to modify working practice to ensure adequate safeguarding.
- 3.18 The College will not employ anyone under the age of 16 in any context.
- 3.19 Although the prevention of abuse is paramount, Safeguarding Risk Assessments also need to take account of other avoidable risk of harm, including the physical environment and the detail of any planned activities.
- 3.20 Anyone who is concerned that a child or adult at risk might have come to harm or be at risk of harm should immediately contact the appropriate person as listed below in Section 8: Reporting Concerns.

4. Safeguarding Students and others who come into contact with the College

- 4.1 In addition to the statutory duty to safeguard children and adults at risk, the College recognises that charities have a wider duty to take reasonable measures to safeguard all beneficiaries and others who come into contact with the charity.
- 4.2 The College also notes the Office for Students' focus on safeguarding students, including the key themes of tackling sexual misconduct, hate crime and online harassment, as highlighted in the Catalyst funding call and the 2018 Advance HE report.
- 4.3 The College actively promotes a safe and supportive environment. This includes taking reasonable steps to ensure that students are able to live and study safely and without undue disruption or risk of harm, and that others who come into contact with the College can do so safely.
- 4.4 A number of College activities, procedures and policies support this, including:
 - 4.4.1 Promoting a healthy and safe environment via our Health & Safety policy, procedures and practice.
 - 4.4.2 Supporting students with appropriate, reasonable and proportionate welfare provision to help them complete their studies.

- 4.4.3 Access to a College GP and term-time College Nurse.
- 4.4.4 Disciplinary procedures to address misconduct, including the Student Non-Academic Disciplinary Procedure; employee disciplinary procedures; and the disciplinary provisions in the College Statutes.
- 4.4.5 Specific measures to deter and address harassment and sexual harassment, including the Harassment Policy, Sexual Harassment Policy, and dedicated welfare support via the central University's Student Welfare and Support Service provision for survivors of sexual violence.
- 4.4.6 Defining clear boundaries in unequal-power situations via the Staff-student Relations policy.
- 4.4.7 Precautionary measures as detailed in Section 5 of this Policy.
- 4.5 There is no such thing as a risk-free environment, and the College acknowledges that some degree of risk is inherent to many activities that are core to College and student life. The College follows the principle that activities should be as safe as reasonably possible given their function and nature, and that the benefit of an activity should be proportionate to the risks. This will be kept under regular review (for example, it is recognised that social events are an integral part of student life, but if a particular type of event is shown to correlate with an increased instance of harassment or unsafe behaviour, it may be modified, suspended or discontinued as appropriate).
- 4.6 The College acknowledges its responsibility to take reasonable steps to ensure a safe environment, but reinforces that individuals are primarily responsible for their own behaviour, and that the responsibility for misconduct lies with the perpetrator(s).

5. Precautionary measures

- 5.1 In some circumstances it may be necessary as a safeguarding measure to restrict access to particular facilities or the College site, for an individual(s) or group(s). This can include restrictions applied for general safeguarding reasons under section 4 of this Policy, and as specified in Appendix E of the College bylaws.
- 5.2 The Dean can restrict a current student's access to particular facilities or the College site, including requiring a student to live outside College accommodation if they judge this to be necessary as a safeguarding measure. This can be temporary (for example, requiring a student to live outside College accommodation while a serious allegation is investigated) or ongoing (for example, restricting a student's access to the College bar where their behaviour indicates an ongoing risk to themselves or others). Restrictions of this kind are not a disciplinary sanction, and will only be applied (i) where the balance of risks indicates that it is reasonably necessary and (ii) for the period that is reasonably necessary.
- 5.3 A student who is subject to a restriction of this kind can request a Review by the Principal, who will determine whether or not the Dean's decision is reasonable and should remain in force or be modified or overturned. The Dean's decision will remain in force while any Review is carried out.
- 5.4 There is no right of further appeal against the Principal's decision in a Review. However, a student who believes that they have been unfairly or unreasonably disadvantaged by a

- precautionary safeguarding measure can make a complaint under the Student Complaints Procedure.
- 5.5 The Dean or the Bursar can restrict access to particular facilities or the whole College site for anyone who is not a current member of College, where they judge this to be necessary as a safeguarding measure. This can be temporary (for example, requiring a student from another College to stay away from the site while a serious allegation is investigated) or ongoing (for example, restricting access for a member of the public whose conduct is disruptive or indicates an ongoing risk to members of the College community). Although the College has the right to control access to the site and there is no right of access for those who are not current members of College, restrictions of this kind will only be applied (i) where the balance of risks indicates that it is reasonably necessary and (ii) for the period that is reasonably necessary.
- 5.6 If a current student believes that they have been disadvantaged by a precautionary restriction placed on someone who is not a current member of College (for example, if a friend or relative from outside College has been excluded from visiting the College site), they may request a Review by the Principal as detailed in paras 5.3 and 5.4 of this Policy. There is no automatic right for someone who is not a current College member to request a Review, but reasonable requests will be considered.
- 5.7 If the Dean or Bursar is unavailable, the Designated Safeguarding Lead or Designated Safeguarding Deputy can make a temporary decision in their place under paras 5.2 or 5.5 of this Policy, which will come into effect immediately, subject to ratification by the Dean or Bursar at the earliest reasonable opportunity.
- 5.8 Notwithstanding the precautionary measures detailed in this policy, any College Officer, manager, porter or Junior Dean can impose reasonable restrictions in the short term (usually understood as no longer than until the end of the next working day, but in any case, no longer than the immediate situation requires) where (i) this is reasonably necessary for the safety or good order of the site or to avoid disruption and (ii) the officers specified in 5.2, 5.5 or 5.7 are unavailable. This can include, for example, requiring a student who is being disruptive after hours to return to their room, or requiring a member of the public to leave the premises.

6. Training

- 6.1 Any member of College whose duties involve interaction with children should complete the online training provided by the Oxford Safeguarding Children Board (http://www.oscb.org.uk/training), 'An Introduction to Safeguarding Children', together with any additional training identified by ongoing risk assessment processes.
- 6.2 Anyone carrying out the role of Designated Safeguarding Officer should have completed Level 2 safeguarding training provided by the Oxford Safeguarding Children Board within the past three years.
- 6.3 The Designated Safeguarding Lead and Designated Safeguarding Deputy should have completed Level 3 safeguarding training provided by the Oxford Safeguarding Children Board within the past two years.
- 6.4 If a member of college needs to carry out a role that requires a particular level of safeguarding training but has not yet been able to undertake this training, they should seek advice from another member of the safeguarding team with an equivalent or higher level of training.

- 6.5 There should always be at least one member of the safeguarding team (DSL, DSD, or DSO) who has undertaken Level 3 safeguarding training within the past two years. During periods when this is not the case (for example, as a result of staff turnover), appropriate external advice will be sought about any safeguarding issues that arise, and the relevant training will be undertaken at the earliest reasonable opportunity.
- 6.6 Copies of all training certificates should be sent to the Human Resources team and kept on an employee's file.

7. Monitoring and assurance

- 7.1 The Designated Safeguarding Lead will maintain a Safeguarding File with copies of all Safeguarding Risk Assessments, and details of any safeguarding concerns or potential concerns, regardless of whether or not a disclosure was made.
- 7.2 At least once per year, the Designated Safeguarding Lead will give formal assurance to the Welfare Committee, and onwards to Governing Body, that this policy is being followed, including that all necessary training has been undertaken and DBS checks carried out.
- 7.3 Any breach of this policy must be reported to Governing Body at the earliest opportunity, regardless of whether or not other disclosures are made.

8. Reporting concerns

- 8.1 Anyone who has any reason to suspect that a child or adult at risk may have come to harm or be at risk of harm must contact the Designated Safeguarding Lead or Designated Safeguarding Deputy immediately.
- 8.2 If the Designated Safeguarding Lead and Designated Safeguarding Deputy are unavailable, anyone with an immediate safeguarding concern about a child or adult at risk should contact the Multi-Agency Safeguarding Hub (MASH) on 0345 050 7666.
- 8.3 Anyone who is concerned that the Designated Safeguarding Lead or Designated Safeguarding Deputy has not acted appropriately in response to a safeguarding concern about a child or adult at risk, or that the Designated Safeguarding Lead, the Designated Safeguarding Deputy, or anyone in a position of responsibility for a child or adult at risk has acted in a way that might cause harm to a child or adult at risk, should contact the Local Authority Designated Officer (LADO): 01865 810603 / lado.safeguardingchildren@oxfordshire.gov.uk
- 8.4 In any case where the Designated Safeguarding Lead or Designated Safeguarding Deputy makes a referral to the Multi-Agency Safeguarding Hub, the police, or any other external agency, they will also assess whether or not the situation meets the threshold for a Serious Incident Report to the Charity Commission, and will make a recommendation to the Principal accordingly.

APPENDIX A: Contact Details

Designated Safeguarding Lead: Gareth Prior, Gareth.Prior@st-hughs.ox.ac.uk

Designated Safeguarding Deputy: Thea Crapper, Thea.Crapper@st-hughs.ox.ac.uk

Designated Safeguarding Officer (admissions, outreach, school visits, and students under 18): Elena Sorochina, <u>Elena.Sorochina@st-hughs.ox.ac.uk</u>

Designated Safeguarding Officer (official social events and commercial events including summer schools): Gemma.Sedgwick@st-hughs.ox.ac.uk

Designated Safeguarding Officer (employees under the age of 18): Head of Human Resources TBC (Bursar in the meantime)

St Hugh's College Lodge: 01865 274900, Lodge@st-hughs.ox.ac.uk

Oxfordshire Multi-Agency Safeguarding Hub: mash-children@oxfordshire.gov.uk / 0345 0507666

Oxfordshire Social Services Emergency Duty Team: 0800 833408

Police Child Protection Team: 01865 335199

In an emergency: 999

APPENDIX B: Signs of Abuse

This document is summarised from the NSPCC's 2018 'Signs of Abuse' Factsheet. The Factsheet in full can be read here: https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf

What is child abuse?

Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or emotional abuse.

Children may be abused by:

- family members;
- friends;
- people working or volunteering in organisational or community settings;
- people they know;
- or, much less commonly, by strangers.

Children suffering abuse often experience more than one type of abuse. The abuse usually happens over a period of time, rather than being a single, isolated incident. Increasingly, abuse can happen online.

General signs of abuse

Children who suffer abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be vigilant to the signs listed below:

- regular flinching in response to sudden but harmless actions, for example someone raising a hand quickly
- showing an inexplicable fear of particular places or making excuses to avoid particular people
- knowledge of 'adult issues' for example alcohol, drugs and / or sexual behaviour which is inappropriate for their age or stage of development
- angry outbursts or behaving aggressively towards other children, adults, animals or toys
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming and thoughts about suicide
- changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes
- in older children, risky behaviour such as substance abuse or criminal activity

- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents / carers. In assessing whether signs are related to abuse or not, they need to be considered in the context of the child's development and situation.

Spotting the signs of physical abuse

Bruising:

- bruises on babies who are not yet crawling or walking
- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks

Burns or scalds:

- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times.

If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

Spotting the signs of neglect

Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some signs include:

- children who appear hungry they may come to school without lunch money or even try to steal food
- children who appear dirty or smelly and whose clothes are unwashed or inadequate for the weather conditions
- children who are left alone or unsupervised
- children who fail to thrive or who have untreated injuries, health or dental problems
- children with poor language, communication or social skills for their stage of development

- children who live in an unsuitable home environment, for example the house is very dirty and unsafe, perhaps with evidence of substance misuse or violence
- children who have taken on the role of carer for other family members

Spotting the signs of sexual abuse

There may be physical signs that a child has suffered sexual abuse. These include:

- anal or vaginal soreness or itching
- · bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge
- sexually transmitted infections
- pregnancy

Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age. For example:

- they could use sexual language or know things about sex that you wouldn't expect them to
- a child might become sexually active at a young age
- they might be promiscuous

Spotting the signs of emotional abuse

There aren't usually any obvious physical signs of emotional abuse but you may spot signs in a child's action or emotions. It's important to remember that some children are naturally quiet and self-contained whilst others re more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development. Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm

This list is not exhaustive. It is important to report all concerns, even if they seem insignificant.

APPENDIX C: Advice for Behaviour around Children

Conduct to be avoided:

- spending excessive amounts of time alone with children, away from others;
- taking children to your home;
- being alone in a vehicle with children;
- any physical contact with children that is not absolutely necessary.

Conduct never to be sanctioned:

- engaging in rough, physical or sexually provocative games;
- giving drugs or other inappropriate substances including alcohol (please note that one of the four key objectives of the Licensing Act 2003 is the 'protection of children from harm' and that it is also an offence for a child to be supplied with or knowingly be allowed to consume alcohol on a licensed premises);
- allowing or engaging in any form of inappropriate touching;
- making sexually suggestive comments to children, even in jest;
- allowing allegations made by a child to go unreported;
- doing things of an intimate nature for children that they can do for

themselves. 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;
- respect a child's right to privacy and, in residential accommodation, not enter a bedroom without prior authorisation except in the case of emergency.