



# **Pembroke College Cambridge**

## **Safeguarding Policy**

### **1. Aims**

- 1.1 The College aims to adopt the highest standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk. The College encounters children and some adults at risk through its teaching, cultural and research activities, as well as through its recruitment and outreach programmes. In particular, the College encounters children in relation to the Pembroke College Girls' Choir.
- 1.2 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.
- 1.3 This policy seeks to:
  - a) promote and prioritise the safety and wellbeing of everyone, particularly children and adults who may be at risk;
  - b) ensure that roles and responsibilities are made clear in respect of safeguarding matters and that an appropriate level of information, training and support is provided to those within the College for whom it is necessary;
  - c) offer assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner;
  - d) prevent the employment of individuals to work with children or adults at risk where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the College to pose an unacceptable risk;
  - e) manage effectively the risks associated with activities and events involving children and adults at risk.

### **2. Scope**

- 2.1 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.
- 2.2 The policy covers all events and activities organised by those working on behalf of or representing the College, as well as official events and activities organised by its students. Such activities with children include open days, schools masterclasses, applicant visits, interviews, programmes for international students, and outreach cultural activities (for example choral activities for children, in particular those of the Pembroke College Girls' Choir). It also covers the interactions between students and the College Nurse, College Counsellor and visits from members of the public. Finally, it covers interactions between staff apprentices under the age of 18 and their supervisors.

2.3 It is expected that external bodies utilising 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.

### 3. Definitions

3.1 *Safeguarding*: describes arrangements in place to protect children and adults at risk in vulnerable circumstances from abuse or neglect.

3.2 (a) *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.

(b) *Chorister*: For this policy's purpose, a "chorister" refers to anyone under the age of 18 and therefore not legally an independent adult who is also a member of The Pembroke College Girls' Choir. It should be noted that the majority of the Choristers are under the age of 16 and particular care should be afforded to them. Consequently Annexes D, E and F set out arrangements and codes of conduct in relation to the Choristers.

3.3 *Adult at Risk*: The term 'adult at risk' is used in this policy to replace the term 'vulnerable adult'. The definition of regulated activity for adults changed in 2012 and now identifies activities, which, if provided to any person aged 18 or over (an adult) who *needs* to engage in that activity, will mean that the adult will be considered at risk at that particular time. It is therefore the activity and the need for it, rather than the setting or the adult's particular personal characteristics, which determines whether an adult is at risk at any given time. These activities are summarized in 3.6.1.

3.4 *Abuse*: can be physical, sexual, psychological/emotional, financial/material or professional. It can also arise from neglect.

3.5 *Regulated activities in relation to children*:

3.5.1 Regulated activities are those activities which people who have been barred by the DBS are prohibited from undertaking.

3.5.2 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-carers.

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

3.5.4 The roles of the College's Porters, Admissions Tutor(s), Schools Liaison Officer, International Programmes officers (IP High School Programme Directors, IP High School Programme Language Instructors, IP High School Programme Lecturers), Director of Music, the Choir Administrator, the College's Dean and Chaplain, housekeeping staff, maintenance staff and IT staff **are** considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.5.5 The roles of the Undergraduate Tutors, Graduate Tutors and the Senior Tutor, Directors of Studies and Supervisors **are not** considered to involve engaging in regulated activity with children under 18 regularly as defined by the relevant legislation.

3.5.6 Full definitions of regulated activity in relation to children, including definitions of regularity, can be found

here:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550197/Regulated\\_activity\\_in\\_relation\\_to\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf)

### 3.6 *Regulated activity in relation to adults at risk:*

3.6.1 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. Any time 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) Providing health care (whether physical or mental, including palliative) provision 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 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).

3.6.2 The roles of the College's Nurse, Counsellor or Mental Health Adviser (where employed by the College) **are** considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

3.6.3 The roles of the College's Chaplain, academic Tutor(s) (including Graduate Tutor(s) and Senior Tutor), Directors of Studies and Supervisors **are not** considered to involve engaging in regulated activity with adults as defined by the relevant legislation.

3.6.4 Full definitions of regulated activity in relation to adults can be found here:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf).

## 4. **Roles**

4.1 The Senior Tutor and Head of HR are the College's designated Designated Safeguarding Leads. As such, they take overall ownership of the policy and will promote the importance of safeguarding within the College. The responsibilities of the Designated Safeguarding Lead are outlined in Annex B.

4.2 Given the complexity of safeguarding matters, it is essential that any concerns are reported to the Designated Safeguarding Lead to ensure that one person has access to all the relevant information. This is particularly important where a number of seemingly minor issues may collectively give rise to a more substantial concern.

4.3 In the unlikely event that a complaint or accusation is made about the Designated Safeguarding Lead, this

will be considered independently by the College's Bursar.

- 4.4 Each Head of Department is accountable for the adoption and implementation of this policy and for promoting safeguarding within their Department. The Head of Department with responsibility for the Pembroke College Girls' Choir is the College's Dean and Chaplain.

## **5. Planning activities**

- 5.1 No high-risk activities are anticipated.
- 5.2 It is the responsibility of the Head of Department to retain oversight for regulated activities within their area and to ensure:
- a) appropriate training and supervision is available to those employees, workers, Fellows, volunteers or students engaging in them;
  - b) occasions in which those engaged in them will need to work alone in an unsupervised way are minimised; and
  - c) that they are appropriately risk assessed
  - d) that children and adults engaged in regulated activities are given clear information about how, and to whom, they can report any safeguarding concerns.

## **6. Risk Assessment**

- 6.1 It is the responsibility of the Head of Department to ensure:
- a) that a risk assessment is undertaken for regulated activities within their area (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);
  - b) that completed risk assessments are made available to employees, Fellows, workers, volunteers or students who are involved in the activity; and
  - c) that the implementation and review of actions identified within a risk assessment is undertaken in a timely manner.
- 6.2 A template risk assessment can be found in Annex C.

## **7. Induction and training**

- 7.1 It is the responsibility of the Head of Department to:
- a) Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College within their area is made aware of the existence of this policy and asked to familiarize themselves with the contents as part of their induction.
  - b) Ensure that any employee, worker, Fellow, volunteer, student working on behalf of the College within their area 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.
  - c) Record and monitor the safeguarding training undertaken by those working on behalf of the College in their area.

## **8. Recruitment and Disclosure and Debarring Service (DBS) checks**

- 8.1 Standardly, a DBS check will be undertaken when recruiting to the roles of Porter, Admissions Tutor, Schools Liaison Officer, Dean and Chaplain, Director of Music, Choir Administrator, Organ Scholar, International Programs officers (IP High School Programme Directors, IP High School Programme Language Instructors, IP High School Programme Lecturers), and some of the housekeeping staff, Nurse, Counsellor, and Mental Health Adviser (if and when employed by the College).
- 8.2 The College will undertake additional pre-employment checks where necessary as part of its safeguarding duty, including checking the accreditation of anyone employed by the College as a healthcare or psychotherapy professional such as a Counsellor or Nurse. References from recent previous employers will also be sought.

- 8.3 It is the responsibility of the Head of Department to:
- a) Inform the Head of HR when a DBS check is required for a role which is to be recruited to, so that the correct documentation can be used as part of the recruitment process;
  - b) Discuss with the Head of HR if uncertain whether a check is required to ensure appropriate checks are carried out.

- 8.4 In liaison with the relevant authorities, the Designated Safeguarding Lead will refer someone to the DBS if they:
- a) Have had their employment with the College terminated because they harmed someone;
  - b) Have had their employment with the College terminated or job role limited because they might have harmed someone; or
  - c) Would have had their employment with the College terminated for either of these reasons, but they resigned first.

## 9. Arrangements for supporting students under the age of 18

9.1 For the avoidance of doubt, 'students' as referred to in this Clause 9 are those who are matriculated undergraduates or students enrolled on a short term international programme. This paragraph does not refer to the Choristers of Pembroke College Girls' Choir (the "**Choristers**"). Arrangements specifically for supporting the Choristers are dealt with separately in Annexes D, E and F. The College is not able to take on 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. However, when admitting a student who will be significantly under the age of 18 when coming in to residence, either as a matriculated undergraduate or as a short term international programmes student, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:

- a) Tutorial support and teaching – the format of tutorial and teaching 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 recognised, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary.
- b) IT – Use of the internet by under-18s for study will be as for all students.
- c) 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.
- d) 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.
- e) 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.

9.2 Residential accommodation offered by the College is generally intended for the use of adults and, except in exceptional circumstances, special arrangements are not made for students who are under the age of 18 years

9.3 NB: it will be necessary to investigate whether the Home Office will issue a visa to an overseas student who is significantly under the age of 18.

## 10. Raising a concern or allegation of abuse

10.1 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) can raise a concern or allegation of abuse by speaking to their line manager/Tutor or any senior member of the College who will escalate

matters to the Designated Safeguarding Lead as a matter of course. Concerns or allegations can also be made directly to the Designated Safeguarding Lead. The Safeguarding Report Form (Annex E) should be completed by the person raising the concern and passed to one of the College's Designated Safeguarding Leads.

## **11. Procedure for dealing with suspicions or allegations of abuse**

11.1 Those working with children and engaged in regulated activities may:

- a) have alleged abuse disclosed to them;
- b) suspect abuse is being carried out; or
- c) be accused of abusing those in their charge.

11.2 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.

11.3 The Designated Safeguarding Lead has responsibility for ensuring that they (or a nominated deputy) are available during normal working hours to respond to allegations without delay, and for procedures to be in place should issues arise outside of normal working hours. Outside of normal working hours, safeguarding concerns will be escalated from the Porter's Lodge to a Tutor or to the Senior Tutor. Unless there is risk of immediate harm (see 11.4 below), the Safeguarding Report Form (Annex E) should be completed and passed to the Safeguarding Officer as soon as possible.

11.4 **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 or the Cambridgeshire and Peterborough Safeguarding Partnership Board should be contacted using the following numbers:**

- Cambridgeshire children: 0345 045 5203
- Peterborough children: 01733 864180
- Out of Hours Emergency Duty Team (EDT): (01733) 234724

**without delay.**

Anybody can make a referral in these circumstances. A referral form can be found using the following link <https://www.peterboroughlscb.org.uk/children-board/reporting-concerns/>. The Designated Safeguarding Lead should then be notified of the case as soon as possible and an internal reporting form also completed.

11.5 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 Designated Safeguarding Lead who will consider what action is required. 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 Designated Safeguarding Lead is privy to all concerns as they arise.

11.6 Appropriate records will be retained by the Designated Safeguarding Lead in accordance with the College's Data Protection Policy. Where the matter relates to both staff and students, the Designated Safeguarding Lead will determine where the file should be kept.

11.7 In consultation with the Master, Senior Tutor/Bursar, Head of HR the Safeguarding Lead will be responsible for contacting any statutory agencies such as the Cambridgeshire and Peterborough Safeguarding Children Partnership Board <sup>1</sup> or the Police, if necessary. The Designated Safeguarding Lead will also have responsibility for fulfilling any legal obligations to report an individual to the DBS.

11.8 The College is not expected and should not attempt to investigate suspicions of abuse independently.

11.9 Where a suspicion needs to be investigated by the relevant authority, it may be necessary for the College

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<sup>1</sup> <https://www.peterboroughlscb.org.uk/children-board/reporting-concerns/>

to do one or more of the following:

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

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

## **12 Relevant College policies**

12.1 This policy should be read in conjunction with the College's policies listed below:

- a) Staff Handbook
- b) Recruitment, Induction and Training
- c) Student harassment and sexual misconduct
- d) Dignity at Work and Study
- e) Data Protection
- f) Whistleblowing
- g) Staff-Student Relationships
- h) Student Accommodation Agreement
- i) IT guidelines
- j) Health and Safety
- k) Student complaints
- l) College Rules and Regulations (including disciplinary process)
- m) Visitor protocols
- n) Events and Speakers Policy (PREVENT)
- o) Staff bullying and harassment policy
- p) Equal opportunities policy
- q) Annex D of this Policy document

12.2 The College's key policies can be found at:

a) for students: <https://www.pem.cam.ac.uk/current-students/policies-procedures-guidance>

b) for staff: <https://www.pem.cam.ac.uk/college/about-pembroke/human-resources>

## **13 Relevant legislation**

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

- a) Health and Safety at Work Act 1974
- b) Rehabilitation of Offenders Act 1974
- c) Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- d) The Police Act 1997
- e) Protection of Children Act 1999
- f) Management of Health and Safety at Work Regulations 1999
- g) The Human Rights Act 1998
- h) Sexual Offences Act 2003
- i) The Children Act 2004
- j) Safeguarding Vulnerable Groups Act 2006
- k) Equality Act 2010
- l) Protection of Freedoms Act 2012
- m) Working Together to Safeguard Children 2015.
- n) Children and Social Work Act 2017

13.2 The Protection of Freedoms Act 2012 is of particular importance as all decisions made to bar individuals from working with children or adults at risk are now made by the Disclosure and Barring Service (DBS) under this legislation.





## Annex A

### Guidance for those acting on behalf of the College carrying out activities involving children or adults at risk

*This guidance should be read in conjunction with the College's Safeguarding Policy.*

#### 1. General considerations

- 1.1 If you are acting in a position of trust with children or adults at risk, you are expected to be mindful that you are acting as a role model and therefore should behave accordingly. The College takes seriously its responsibility under section 11 of the Children's Act and duties under 'working together' to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements exist to identify and support those children who are suffering harm or are likely to suffer.
- 1.2 We aim to support the child's development in ways that will foster security, confidence and resilience.
- 1.3 We aim to provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- 1.4 Care should be taken to ensure that your conduct is appropriate to each circumstance and environment as well-intentioned actions can be misinterpreted.
- 1.5 All regulated activities should have undergone a risk assessment process, and you should have a copy of the relevant risk assessment which will identify the person to whom any concerns should be addressed promptly.
- 1.6 In your role you may become aware of, or suspect another person of abusing a child or adult at risk or they may disclose an allegation of abuse to you. You should raise any concerns with your Head of Department without delay or, where this is not possible, the Designated Safeguarding Lead should be notified directly.
- 1.7 Allegations of inappropriate behaviour may also be made against you, and such allegations will need to be investigated, and may result in referral to external agencies.

#### 2. Safeguarding of children and adults at risk

##### 2.1 *You should:*

- a) Treat everyone within the College community with respect;
- b) Provide an example of good conduct for others to follow;
- c) 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;
- d) Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in;
- e) Give due regard to cultural difference;
- f) 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;
- g) If you have to give feedback, take care that it is not unnecessarily negative;
- h) Avoid being in a situation where you are alone with a child and make sure that others can clearly observe you;
- i) Take care that your language is not open to sexual connotation;
- j) 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 Designated Safeguarding Lead;
- k) 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.

##### 2.2 *You should not:*

- a) 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);
- b) Use inappropriate language, or allow others to use it without challenging it;
- c) Allow yourself to be drawn into inappropriate attention-seeking behaviour;
- d) Show favouritism to any individual;
- e) Rely on the College's good name to protect you;
- f) Engage in any physical sexual relationship with a person to whom you are in a position of trust, even if they give their consent;
- g) 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;
- h) 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;
- i) Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on;
- j) Allow personal preconceptions about people to prevent appropriate action being taken;
- k) 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;
- l) Take photographs, or make other recordings of children or adults at risk without specific written consent of the individual, or someone with parental responsibility for that individual.

2.3 *You should seek advice from your Head of Department if:*

- a) You suspect a relationship is developing which may be an abuse of trust;
- b) You are worried that a child or adult at risk is becoming attracted to you or a colleague;
- c) You think a child or adult at risk has misinterpreted something you have done or said;
- d) 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;
- e) A child or adult at risk tells you that they are being abused, or describes experiences that you consider may be abuse;
- f) You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

**3. Dealing with disclosures of allegations, or suspicions, of inappropriate behaviour**

- a) 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. Anybody can make a referral in these circumstances. The relevant Designated Safeguarding Lead 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;
- b) 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);
- c) DO NOT try to investigate or act on the matter yourself: doing so may seriously compromise an investigation by the relevant authorities. You need only clarify what is being said to you (in order to establish that there is a suspicion of harm), and then refer the matter to the appropriate individual as set out in the policy;
- d) 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. Explain who you will talk to;
- e) Avoid 'leading' questions, or expressing a view about what you have been told;
- f) Use clear language, appropriate to the person you are dealing with;
- g) Do not talk to anyone else about the matter within your Department; if you need to seek support for yourself you should speak to your Head of Department or the Designated Safeguarding Lead;
- h) Complete a Safeguarding Report Form (Annex E) and submit it to one of the College Designated Safeguarding Leads. Write down what you have been told as soon as possible. In all events this must be

done on the same day but this should not delay prompt action. Write down exactly what was said *in the person's own words* as far as possible, include the time, place, and as much detail as you can remember, but ensure that the note is as factual as possible and avoid assumption, speculation or opinion. Sign and date the note. Bear in mind that the note will be disclosable to both internal and external agencies.

## **Annex B - Role of Designated Safeguarding Lead**

*This guidance should be read in conjunction with the College's Safeguarding Policy.*

The role of the Designated Safeguarding Lead is as follows:

- 1. To raise awareness by:**
  - a) Reviewing on a regular basis the activities of the College involving children or adults at risk;
  - b) acting as a senior strategic figurehead for Safeguarding issues at the College;
  - c) ensuring that the Safeguarding Policy is implemented, and promulgated;
  - d) ensuring regular review of the Safeguarding Policy, at least annually, including making recommendations for the amendment of the Policy in line with changes to legislation, when required.
  
- 2. To manage referrals by:**
  - a) keeping an accurate record of any incidents or matters that raise issues concerning the protection of children or adults at risk, in line with the College's policy on data protection and retention;
  - b) advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the policy;
  - c) liaising with external agencies where appropriate (such as the Police or the Cambridgeshire and Peterborough Safeguarding Partnership Board); and
  - d) ensuring that those involved in any case are appropriately supported.
  
- 3. To undertake and promote appropriate training by:**
  - a) engaging in training to ensure that knowledge is kept up to date;
  - b) ensuring that appropriate information and training are available to members of the College who in the nature of their role will come into contact with adults at risk and children.
  
4. The Safeguarding Lead will be responsible for identifying roles within the College for which a DBS check is required.
  
5. The Safeguarding Lead will report annually to the College Council / Governing Body on matters concerning the protection of children and adults at risk and on the operation of the College's Safeguarding Policy.

**ANNEX C**

<b>Risk assessment form</b>					
College Department:					
Head of Department and contact details:					
Safeguarding Lead and contact details:					
Dates risk assessment written and revised:					
Describe/outline the activity that is under assessment:					
Distribute to all staff, students, volunteers involved in running the activity (list names):					
Hazard (Cause and consequences)	Affected Group	Existing Controls (if any in place)	Risk level (see matrix example)	Further Action (if necessary, include names and dates)	
Risk Matrix		Likelihood			
		High	Medium	Low	Negligible
Potential or probable consequences	Severe	High	High	Medium	Effectively Zero
	Moderate	High	Medium	Medium/Low	Effectively Zero
	Insignificant	Medium/Low	Low	Low	Effectively Zero
	Negligible	Effectively Zero	Effectively Zero	Effectively Zero	Effectively Zero

## **ANNEX D**

### **Arrangements for the Pembroke College Girls' Choir (supervision, routines, activities, Code of Conduct and response to disclosures)**

This document is intended to supplement the College's Safeguarding Policy statement in arrangements for the support of Choristers in the Pembroke College Girls' Choir and refers only to the arrangement for the choristers in that Choir.

The Pembroke College Girls' Choir is made up of approximately 20 regular members, aged 10-18 (the numbers can vary from year to year). The regular members attend rehearsals and services every week during term time on a Wednesday from 4.45 until 7 p.m. and on a Thursday from 4.15 until 6 p.m. These activities take place on the main site of Pembroke College Cambridge. The choir is also involved in occasional concerts, recordings and tours outside of Pembroke College.

#### **Supervisors**

The two people most closely involved in the running of the choir are The Director of Music and the Choir Administrator. They are supported by two student organ scholars, the Chaplain/Dean of Chapel, two singing teachers and the Head of the Music Department in Pembroke College. All of these individuals undergo a DBS check.

On occasion, parent volunteers may also be recruited to help with choir supervision; in particular for outside events such as concerts. When supervision is expected to involve regular or long periods of time (e.g. on a tour) then parent supervisors will undergo a DBS check.

In addition, both the Choir Administrator and the Director of Music will undergo training with Cambridgeshire County Council so that they are Licenced Chaperones for the purposes of taking Children under 16 to perform in concerts where the audience have paid for their tickets.

#### **Location of Activities**

Weekly rehearsals and services take place in the **College Chapel**, on the Main Court of the College. Choristers change in the **Vestry** located next to the chapel. Theory lessons take place in the chapel and Singing lessons take place in the Director of Music's Room, **L9**. Toilets are located next to the Porter's Lodge.

#### **Weekly Routine**

**Arrival:** Choristers are asked to arrive from 4.40 p.m. on a Wednesday and from 4.00p.m. on a Thursday, by which time the Director of Music, Choir Administrator or Organ scholar will be present to supervise them. Children arriving earlier are required to be supervised by a parent or other guardian.

**Departure:** Choristers are supervised until they are picked up by a parents or guardian outside the Chapel in Pembroke College. When a parent has specifically requested it, older children may be allowed to make their own way home. If a parent or guardian is delayed in picking up the Chorister, the Choir Administrator, Director of Music or Organ Scholar will take the chorister to wait in the Porter's Lodge with the Porters until they are collected.

**Toilet visits:** Choristers will be escorted to the nearest toilet by the Choir Administrator, Director of Music or organ scholar.

**Theory and singing lessons:** Choristers may receive weekly theory lessons in the chapel at 4.15 pm on a Thursday for 30 mins. Singing lessons will take place in the music rooms located in (i) the basement of Chris Adams House, or (iii) adjacent to the New Cellars (Foundress Court), the Old Library or (iv) the music room in the Old Lodge Cellars. Each chorister will be escorted to and from that lesson by the Choir Administrator.

### **Communications with Parents/Guardians.**

All communications are made with parents and not with the girls' personal mobiles or email addresses. Where there is any exchange of emails with the girls directly, the parents will always be copied into the email. The parents all have been given the mobile number of the Choir Administrator to allow parents to get in touch in the event of an emergency. Normal communications between parents and the Director of Music and Choir Administrator will be by email.

### **Emergency details, medical and dietary requirements**

A record is kept and updated of all emergency contact details, medical and dietary requirements. This list is easily accessed by the Choir Administrator, Director of Music and all relevant supervisors.

### **Photography and Video Recordings**

Parents sign a consent form every year to cover broadcast and publication of images and video recordings of the Choristers for the purposes of publicity. The Choristers names will not be linked to the images. In the case of the annual official Choir Photograph, which does include names, access is limited to Choir parents only.

### **Events outside Pembroke College, Cambridge**

A Risk Assessment document (See Appendix C above) is drawn up for all choir events taking place outside the College site. Where the Choristers are performing to a paying audience, a licence will be obtained from Cambridgeshire City Council for each Chorister who is under the age of 16. A Chaperone's licence will be obtained for these purposes for the Choir Administrator and the Director of Music. In the event of the Choristers being involved in a foreign tour which would take them out of school, a Magistrate's Licence will be sought.

### **Events involving the Girls' Choir and the College Choir.**

Each term the Choristers will sing some services and concerts jointly with the College Choir. While this means they come into regular contact with adults, there are no circumstances where adults other than those specified above (Director of Music, Organ Scholars and Choir Administrator) are deemed to be in a position of authority over the Choristers. They will change in separate rooms before service and be separately supervised. It is therefore not considered necessary to obtain DBS checks for all College Choir members. However, one female College Choir member each year may be tasked with mentoring the Choristers and reporting to the Director of Music any concerns; this Choir member will be DBS checked.

### **CODE OF SAFE CONDUCT: Guidelines for Staff who are involved with the Pembroke College Girls' Choir**

Within Pembroke College Girls' Choir' acknowledgement that it has a responsibility for the safety of children involved in all of its activity and that the welfare of the child/young person is paramount, it expects all staff to adhere to safe conduct.

Attention is drawn to the position of trust you hold in working with children and the power and influence you hold. Pembroke College Girls' Choir expects this responsibility to be at the forefront of the minds of all staff to ensure that these positions of trust are never abused.

#### **Staff should:**

- Value and respect children as individuals
- Wherever possible ensure that there is more than one adult present during activities with children and young people and avoid spending time with young people unobserved
- Invite the young person to bring a friend, move into view of others or leave the door open in situations where it is absolutely necessary to be with a child without another adult present
- Give guidance and support to inexperienced helpers

- Be aware of any physical contact with a young person. Where necessary, for example when there has been an accident and you are the on duty first aider, ensure that you are treating the person for the injury. Do not continue with any additional contact wherever it is unnecessary
- Be aware that sometimes children can behave in an inappropriate way towards an adult, eg being overly friendly, challenging or aggressive. If this situation arises staff must be sensitive to, but firm with the child in discouraging any inappropriate behaviour on the part of the child. Any incident of this nature, regardless of how trivial it may appear must be reported to the Safeguarding Lead (Senior Tutor) and a record of it made. The Safeguarding Lead will determine whether the matter needs to be discussed with a parent/guardian

#### **Staff must not:**

- Have, or be perceived to have, favourites
- Make suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted
- Take young people to your home
- Use physical punishments or any action that involves locking up or restraining a child
- Arrange meetings outside working hours
- Develop social relationships with young people that participate in Pembroke College Girls' Choir
- Have direct individual contact with children through social media, eg Facebook or Twitter

#### **Supporting Staff**

We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the designated Safeguarding Lead and to seek further support.

We recognise that our designated Safeguarding Lead should have access to support and appropriate workshops, courses or meetings

#### **Allegations against Staff**

We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Safeguarding Lead.

Pembroke College Girls' Choir will follow the procedures for managing allegations against staff, a copy of which can be accessed through the Cambridgeshire and Peterborough Safeguarding Partnership Board website.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and would only be taken following consultation with the Local Authority Designated Officer.

#### **Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought where necessary.

#### **CODE OF SAFE CONDUCT: DEALING WITH DISCLOSURES**

##### **Receive**

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Listen quietly and actively, giving your undivided attention. Allow silences when needed. Do not show shock or disbelief but take what is said seriously.



**Reassure**

Stay calm, no judgements, empathise. **Never make a promise that you can keep what a child has said a secret.** Giving reassurance to only those who need to know will be told. Reassure the child that they were right to tell you.

**React**

React to the child only as far as is necessary for you to establish whether or not you need to refer this matter, but don't interrogate for full details.

Don't ask leading questions – keep the open questions e.g. 'is there anything else you want to say?'

Do not criticize the perpetrator; the child may have affection for him/her.

Explain what you will do next – inform designated Safeguarding Lead, keep in contact.

**Record**

If possible make brief notes about what they are actually telling you at the time. Keep these notes, however rough they are. If you are unable to make notes at the time write down what was said as soon as you can.

Try to record what was actually said by the child rather than your interpretation of what they are telling you.

Record the date, time, place and any noticeable nonverbal behaviour.

See Appendix E (Report template) and G (Child Protection Records for more details on recording)

**Report**

Report the incident to the designated Safeguarding Lead and do not tell any other adults or child what you have been told.

<p><b>Never attempt to carry out an investigation of suspected abuse by interviewing the young person or any others involved. This is a highly skilled role and any attempts by yourself could affect possible criminal proceedings.</b></p>
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## ANNEX E

### Safeguarding Report Template

- Use this form to provide as much detail as is immediately available to you, but do not attempt to obtain additional details from or about anyone else involved in the disclosure.
- Pass this information IMMEDIATELY to a College Safeguarding Contact (see list) who will follow up and take the appropriate action. This should be handed over and acknowledged by the next working day.
- Do not discuss your concerns with anyone other than a Safeguarding Contact.
- Do not attempt to investigate the concerns yourself.
- You may need support to cope with the disclosure/concerns you have dealt with – ask the Safeguarding Contact for advice.

#### Safeguarding Contacts

Name	Title	Safeguarding Role	Telephone	Email
Robert Mayhew	Senior Tutor	Safeguarding Lead	(3)38114	<a href="mailto:senior.tutor@pem.cam.ac.uk">senior.tutor@pem.cam.ac.uk</a>
Jeanette Hurworth	Head of HR	Safeguarding contact HR	(7)65532	jeanette.hurworth@pem.cam.ac.uk

#### Your details

Name:
Department:
Position:
Contact telephone numbers: Work:                      Mobile:
Contact email address:
Address at work:

#### Student's or Chorister's details

Name:
Date of Birth
Tutor
Contact details:

#### Details of concern – please continue on additional sheets if required

Are you reporting your own concerns or passing on those of somebody else? (Give details)
--

Brief description of what has prompted these concerns. Include dates, times, venue etc. of any specific incidents and descriptions of any alleged or suspected abuse (emotional, sexual, physical abuse, discrimination or harassment), include descriptions of any injuries or marks which are observed. Include any relevant background that might explain the student's / chorister's behaviour.
---

Your Signature:	
Print your name:	Date:

**For completion by the reporting person, with the Safeguarding Lead**

Does the concern fall into one of the following categories?			
Neglect	<input type="checkbox"/>	Sexual Abuse	<input type="checkbox"/>
Physical Abuse	<input type="checkbox"/>	Emotional Abuse	<input type="checkbox"/>
Signed _____ (Member of staff)		Signed _____ (Designated Safeguarding Lead)	
Has this information been passed to any other agencies? (Please give details) If not, please record reasons why			

## ANNEX F

### CATEGORIES OF ABUSE

The table below outlines the four main categories of abuse as defined by the Department of Health 'Working Together to Safeguard Children' document 2010 (Full definitions can be found in this document, link at the end of this policy). Staff should be aware that the possible indicators are not definitive and that some children may present these behaviours for reasons other than abuse.

<b>Type of Abuse</b>	<b>Possible Indicators</b>
<p><b>Neglect</b></p> <p>The persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairments of the child's health or development.</p> <p>This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical harm or danger or allow access to medical treatment.</p>	<p>Obvious signs of lack of care including:</p> <ul style="list-style-type: none"> <li>• Problems with personal hygiene</li> <li>• Constant hunger</li> <li>• Inadequate clothing</li> <li>• Emaciation</li> <li>• Lateness or non-attendance at school</li> <li>• Poor relationship with peers</li> <li>• Untreated medical problems</li> <li>• Compulsive stealing and scavenging</li> <li>• Rocking, hair twisting, thumb sucking</li> <li>• Running away</li> <li>• Low self-esteem</li> </ul>
<p><b>Physical Abuse</b></p> <p>Actual or likely physical injury or failure to prevent physical injury or suffering to a child including hitting, shaking, throwing, burning or scalding, deliberate poisoning, suffocation or Munchausens syndrome by proxy (FII – fabricated or induced illness).</p>	<ul style="list-style-type: none"> <li>• Physical signs that do not tally with the given account of occurrence</li> <li>• Conflicting or unrealistic explanations of cause</li> <li>• Repeated injuries</li> <li>• Delay in reporting or seeking medical advice</li> </ul>
<p><b>Sexual Abuse</b></p> <p>Forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, penetrative or non-penetrative acts and also includes involving children in watching pornographic material or watching sexual acts.</p>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Displays of affection which are sexual and age inappropriate</li> <li>• Tendency to cling or need constant reassurance</li> <li>• Tendency to cry easily</li> <li>• Regression to younger behaviour – eg thumb sucking, acting like a baby</li> <li>• Unexplained gifts or money</li> <li>• Depression and withdrawal</li> <li>• Wetting/soiling day or night</li> <li>• Fear of undressing for PE</li> </ul>
<p><b>Emotional Abuse</b></p>	<ul style="list-style-type: none"> <li>• Rejection</li> <li>• Isolation</li> </ul>

<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p>	<ul style="list-style-type: none"> <li>• Child being blamed for actions of adults</li> <li>• Child being used as carer for younger siblings</li> <li>• Affection and basic emotional care giving/warmth, persistently absent or withheld</li> </ul>
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## **CHILD SEXUAL EXPLOITATION (CSE)**

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child’s or young person’s limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009).

### **Key facts about CSE**

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8
- It affects both girls and boys and can happen in all communities
- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with disabilities
- Victims of CSE may also be trafficked (locally, nationally and internationally)
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers
- Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children

### **CSE Good Practice – Individuals**

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective/behaviour of the child/young person and be patient with them
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice / refer to Social Care

## **CSE Good Practice – Organisations**

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

## **ANNEX G**

### **CHILD PROTECTION RECORDS**

The purpose of this section is to provide guidance on record keeping, to enable the designated member of staff with a responsibility for child protection to ensure that all child protection information and concerns are kept in an appropriate and useful manner.

Deficiencies in record keeping have been identified by several child death enquiries as a problem area that requires attention from all agencies.

Good record keeping is essential in safeguarding the welfare of children and young people, particularly with regards to children/young people who are subject to child protection plans or who are identified as vulnerable. For this reason, it is advisable to carry out a regular audit of all child protection information kept by Pembroke College Girls' Choir, to ensure that procedures are being followed correctly.

This section seeks to answer the following questions:

- What kind of information should be recorded?
- How should notes and reports be made?
- Where should child protection information be kept?
- Who should have access to child protection information?
- What should happen to the information when a child leaves the setting?
- How should I share information with other schools/agencies?
- How long are child protection records kept by settings?

#### **Record Keeping**

The designated Safeguarding Lead for child protection is responsible for ensuring that the necessary paperwork is completed and sent to the relevant people and stored in a safe and confidential place. This is either a locked filing cabinet, with restricted access, or held securely electronically.

#### **How should notes and reports be made?**

It is impossible to say, at the time of making a child protection note, who will eventually have access to it, or when. It may be consulted months or even years after it was written. Always bear in mind that someone who is a complete stranger to you and your organisation may need to read your record at some stage in the future.

Ideally, logs of incidents should be typed. If hand written, notes should be clearly legible and written in ink. All notes and reports must contain the following:

- Date of the incident, including year
- Date and time of the record being made
- Name and date of birth of the child(ren) concerned
- A factual account of what happened, and the location where the incident took place (include the actual words spoken by the child where possible)

- A note of any other people involved e.g. as witnesses
- Action taken, and any future plans e.g. monitor and review
- Any other agencies informed names, dates, times of anyone spoken to.
- Printed name of the person making the record
- Job title of the person making the record
- Signature (print name alongside)

The source of the information should be identified e.g. 'Mrs Bell, a midday supervisor, informed me that...' Or 'I saw John in the playground at break time....'

Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (e.g. 'Jenny was crying and rocking' rather than 'Jenny was upset')

Opinion is acceptable provided that you can give some justification for holding it (e.g. 'Sam ran and hid under the table when his mother arrived to take him home and clung to me when I tried to get him out. He appeared to be frightened.')

Make a note of what you have done with the information (e.g. 'I consulted the Safeguarding Lead, and she said she would...')

Try to avoid specialist jargon that someone from another agency would not necessarily understand.

### **What should happen to the information when a child leaves Pembroke College Girls' Choir/ How long should information be kept?**

Records of concern will be kept for seven years. Paper records should be destroyed through shredding and disposed of as confidential waste. Electronic records should be deleted. A record should be made of records destroyed, and should be authorised by the Safeguarding Lead.

Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 1984. For manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, Pembroke College Girls' Choir may be required to provide its child protection records.

### **Sharing Information with other organisations**

In situations where a request is made by another organisation for information about an individual, the Safeguarding Lead must be informed. Their decision, including the reason for this decision, should be recorded and stored.

In all cases where information is shared the following information should be recorded:

- Date and time
- Summary of information shared
- Who the information was shared with
- Whether you are sharing with or without consent
- If sharing without consent, whether the child or family were informed
- How the information was shared and any receipt of it having been received



### **What kind of information should be recorded?**

Any member of staff who has a concern about a child should make a written note. This must be passed on to the designated person, (although a personal copy may be kept in a secure place). The note should be timed, dated and signed, with your name printed alongside the signature.

**Notes must be made as soon as possible and certainly within 24 hours of the incident giving rise to the concern.** (This is important, in case the note is needed for submission to court.) Notes do not have to be officially (or beautifully!) presented. The important thing is that they are:

- factual
- using a child's own words where possible
- a record of what you **saw** and **heard**

Professional opinions are acceptable but only if you state the facts or observations upon which your opinion is based.

**Monitor the child and record observations as factually as possible.**

**April 2022**