Brasenose College
Safeguarding Policy
August 2025

1. Introduction.

1.1 As a registered charity, Brasenose College recognises the responsibility of its trustees to protect from harm everyone coming into contact with its activities and to promote a safe environment. To ensure clarity in governance, roles and procedures the College distinguishes between the following areas.

i. General duty of care.

The College recognises a general duty of care to prevent foreseeable harm arising towards all those engaging with our charity through its operations – staff, volunteers, beneficiaries, contractors and the public.

Responsibility: all trustees and managers are responsible for upholding the duty of care with oversight by the Human Relations Committee and Health and Safety Committee.

ii. Safeguarding.

The College recognises an enhanced duty of safeguarding towards children and vulnerable adults, in line with the *Children's Acts* 2004, the *Care Act* 2014 and other relevant legislation. It also recognises a more general duty to ensure that all those engaging with the charity through its operations are protected from abuse, harassment, bullying, and exploitation.

Responsibility: the Lead Safeguarding Officer (the Dean) oversees this area, reporting to the Trustees.

iii. Health and Safety.

The College ensures compliance with relevant health and safety legislation, including risk assessments, incident reporting, and physical safety measures across the Charity's premises and activities.

Responsibility: the Domestic Bursar is responsible for Health and Safety, with Trustee oversight via the Audit and Risk Committee and Health and Safety Committee.

iv. Prevent Duty.

Under the *Counter-Terrorism and Security Act* 2015, higher education providers (including charities) have a statutory duty to have due regard of the need to prevent people from being drawn into terrorism. This is referred to as the Prevent Duty. While Prevent is not identical to safeguarding, it sits within the wider safeguarding framework. Safeguarding's rationale is to protect students and persons engaging with the charity from harm in all forms, including the risk of radicalisation or exploitation by extremist groups.

Responsibility: the Bursar is responsible for the Prevent Duty with Trustee oversight via the Welfare Committee.

v. Integration and Assurance.

While these three areas are managed through separate policies and defined roles, the College ensures regular cross-referencing of policies to prevent gaps arising. Joint training on safeguarding and safety is undertaken by staff. A Whistleblowing policy links to these areas and supports a culture of openness and accountability. Policies within each area are reviewed annually and serious incidents reported in line with the Charity Commission's Guidance.

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

1.3 This Policy recognises the welfare of children and/or adults at risk as a matter of paramount importance, and aims to safeguard their well-being, in particular by protecting them from abuse of any kind. This Policy has been produced in response to, and should be read in conjunction with, the University of Oxford's *Safeguarding Code of Practice* (2024), https://hr.admin.ox.ac.uk/sitefiles/safeguarding-code-of-practice-april-2024.pdf.

2. Scope.

2.1 For the purposes of this policy, 'child' or 'children' refers to a person or persons under the age of 18 (as defined in the *Children Act* 2004).

2.2 For the purposes of this policy, an 'adult at risk' refers to the Department of Health definition as "those who are or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."

2.3 This policy applies to all activities involving children and/or adults at risk and to all College Members. Most College members are adults aged 18+ but a small number of undergraduates commence study aged 16 or 17. Special permission of the trustees is needed to admit persons under the age of 16 and these young people would be under the care of parents or a responsible adult until attaining the age of 16. The College's Admissions Policy and section 9 of this policy sets out further details.

2.4 For the purposes of this policy, a College Member is anyone at Brasenose College, working with children and/or adults at risk whether as a fellow, employee, student or volunteer. 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 etc Act* 1974, and '*Keeping children safe in education*' 2022 where contact comes through schools.

2.5 Where a College Member occupies a position of trust with regard to children and/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.

2.6 The College also has certain powers, under the *Rehabilitation of Offenders Act* 1974 and *Safeguarding Vulnerable Groups Act* 2006, to enquire as to the criminal records history of Members to assess any risk to children and/or adults at risk.

3. Preventative Measures.

3.1 The College's Lead Safeguarding Officer (LSO) is the Dean. The College's Designated Safeguarding Officers (DSO) will depend on the specific event but in most cases will be the Domestic Bursar or the Senior Tutor. The Senior Tutor is the DSO for admissions or academic matters pertaining to school visits, interview candidates under-18, and students admitted under-18 but who are older than 16; the Domestic Bursar is the DSO for all other matters. Contact details can be found in section 14 of this Policy. The LSO and DSOs should have a Disclosure and Barring Services (DBS) check at the appropriate level.

The LSO and DSOs are responsible for:

- Implementing and promoting this Policy;

- Ensuring that the Policy is monitored and reviewed yearly in accordance with changes in legislation and guidance on the protection of children/adults at risk;
- Acting as the main contacts within the College for the protection of children and adults at risk;
- Ensuring that appropriate College Members are provided with information, advice and training on the protection of children and adults at risk;
- Establishing maintaining contacts with the local Children's Social Care Services departments and Police;
- Maintaining confidential records of reported child abuse cases and action taken.
- The Dean will include Safeguarding in his annual report on student wellbeing as set out in the College's By Laws for Welfare Committee.

3.2 Where a role may require College Members to have unsupervised contact with, regularly care for, train supervise or be in sole charge of children and/or adults at risk, the College will require satisfactory completion of a Disclosure and Barring Services (DBS) check at the appropriate level.

3.3 All College Members are expected to comply fully with the guidance and procedures set out in this Policy. The College will ensure that Members are fully briefed and/or trained (as appropriate) on the implications of this policy.

4. **Forms of Abuse.**

4.1 The UK Government guidance, *Working Together to Safeguard Children* (2018), defines four types of child abuse (all of which apply equally to adults at risk):

- Physical – the physical hurting or injuring of a child or adult at risk.
- Emotional – the persistent emotional maltreatment of a child or adult at risk, which results in severe or persistent adverse effects. Emotional abuse is often present in other categories of abuse, although it may occur independently.
- Sexual – the forcing or enticing of a child or adult at risk to take part in sexual activities. The activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-contact activities such as involving children or adults at risk in looking at, or in the production of, sexual images, or grooming a child in preparation for abuse (including via the internet).
- Neglect – the persistent failure to meet a child or adult at risk's basic needs, likely to result in the serious impairment of their health or development. Neglect can include failure to provide the following: adequate food, clothing and shelter; protection from physical and emotional harm or danger; adequate supervision; access to appropriate medical care or treatment.

5. **Recognising Abuse.**

5.1 The abuse of children and or adults at risk can and does occur both within family and in institutional or community settings. The following may indicate that a child or adult at risk is being or has been abused:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child's or adult's explanation appears inconsistent;

- The child or adult at risk describes an abusive act or situation;
- Unexplained changes in behaviour;
- Inappropriate sexual awareness or sexually explicit behaviour;
- The child or adult at risk appears distrustful of adults;
- The child or adult at risk is not allowed to be involved in normal social activities;
- The child or adult at risk becomes increasingly dirty or shabby.

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

6. Dealing with suspicion or allegations of abuse.

6.1 Those working with children and adults at risk may:

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

Whilst these issues may require very different courses of action, it is essential that the safety and welfare of the child or adult at risk is prioritised.

6.2 College Members should address any concerns to the DSO for the College. If those concerns relate to the DSO for the College, College Members are expected to discuss the matter with the LSO or to contact the Local Authority Designated Officer (LADO) at the Oxfordshire Safeguarding Children Board directly (contact details are on the last page of this policy). If an individual feels that the DSO or LSO has not responded appropriately, then they are encouraged to contact the LADO without delay. Every effort should be made to maintain confidentiality. Suspicions or allegations of abuse must not be discussed with anyone else other than those named in 3.1. The LADO should provide advice and guidance, liaising with the police and other agencies to ensure the concerns are dealt with as quickly as possible consistent with a thorough and fair process.

6.3 It is the responsibility of the LSO to act on behalf of the College in dealing with allegations or suspicion of abuse. In the case of children it is the task of Social Services, not the College, to investigate the matter, under Section 47 of the *Children Act* 1989. Under no circumstances should a College Member conduct their own investigation into suspicions or allegations of abuse, neither should they question children closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services.

6.4 If a child or adult at risk says something or acts in such a way that abuse is suspected, the person receiving the information should:

- React in a calm but concerned way;
- Tell them that they are right to share what has happened, and that they are not responsible for what has happened;
- Find an early opportunity to explain that it is likely that the information will need to be shared;
- Take what the child or adult at risk says seriously and allow them to continue at their own pace;
- Keep questions to an absolute minimum (only clarify what the child or adult at risk is saying) and not ask a question that suggests a particular answer;
- Not interrupt the child or adult at risk when they are recalling significant events;

- Reassure the child or adult at risk that the problem can be dealt with;
- Inform the child or adult at risk what will happen next and with whom the information will be shared;
- Do not promise to keep secrets;
- Make a full record of what is said and done, though this should not result in a delay in reporting the problem.

6.5 The record should include:

- The child's or adult at risk's account of what has occurred;
- Any dates, times or places and any other potentially useful information;
- The nature of the allegation or concern;
- A description of any visible physical injury (clothing should not be removed to inspect the child or adult at risk).

If handwritten, contemporaneous notes are typed up, the original notes must be retained.

6.6 The record may be used later in criminal proceedings and it is vital that what the child or adult at risk discloses is recorded as accurately as possible. The record must be drafted in the child's or adult at risk's words, and should not include the assumptions or opinions of others.

6.7 The problem should be reported immediately to the DSO who will take the appropriate action. If the concern arises out of normal office hours (evenings and weekends) contact should be made with the Social Services Emergency Duty Team on 0800 833408. In the case of children, advice can also be sought from the NSPCC 24-hour helpline on 0800 800 5000, or from the Police Child Protection team on 01865 335199. In an emergency, dial 999.

6.8 It is recognised that College Members may need support after receiving a disclosure from a child or adult at risk, and appropriate support or referral will be offered by the College.

6.9 All College Members (including those with obligations to particular codes of conduct/professional ethics that may be thought to constrain their actions) are required to report or act on any disclosures or allegations of abuse that involve a College Member and that have taken place at the College or on College business.

7. **Procedure for dealing with allegations or suspicions about a College Member.**

7.1 It can be difficult to accept that a colleague may deliberately harm a child or adult at risk. When a concern arises, there are three processes that may need to take place:

- A child protection investigation (in the case of children);
- A criminal investigation;
- Action by the College/University to discipline or remove the Member.

7.2 If the College removes a member from working with children because the person poses a risk of harm to children, the College must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

8. **Planning an activity.**

8.1 Any College Member who has responsibility for organising an activity involving children and/or adults at risk must nominate an individual to act as the designated safeguarding lead for the activity. The LSO and the Porters Lodge should be informed who the DSO for a particular activity is.

8.2 Activities should:

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

8.3 Every activity that involves children and/or adults at risk should be risk assessed, and the assessment should consider how the risks identified can be minimized. It should also outline the local processes for reporting concerns, as well as taking account of Health and Safety considerations. Once completed, the risk assessment must be approved by a Safeguarding Officer before the activity is undertaken. The risk assessment for any activity involving adults at risk or children should identify at least one individual who will act as the key contact point to deal with such matters. The nominated safeguarding contact for the activity is responsible for ensuring that concerns and allegations are escalated to the appropriate Safeguarding Officer without delay.

8.4 Completed risk assessments should be made available to all staff or volunteers involved in the activity.

8.5 It is expected that for visits by schools where members of staff of that school are in attendance, the school will complete its own risk assessment and take its own child protection steps in accordance with local education authority guidelines.

8.6 Any pre-employment or pre-activity checks should be carried out in accordance with the Uni-versity's guidance published at: https://hr.admin.ox.ac.uk/pre-employment-checks

8.7 Children and adults at risk who are participating in a College activity must, as part of their induction to the activity, be given clear information about how, and to whom, they can report concerns about any member of the College with whom they will be interacting. More than one point of contact should always be given and the details of the College's Safeguarding Officers included (in addition to the contact details of the nominated safeguarding lead for the activity) so that complaints can be made directly to these officers, where appropriate.

9. **Students under the age of 18.**

9.1 The College may admit students who commence their studies before their 18th birthday provided that they are aged 16 or older and studying a degree programme other than Medicine. Special approval of the trustees is needed to admit a student aged under 16 years and such a young person would live with their parents or guardians until attaining the age of 16, at which point they would have the option of being resident in College. The College recognises that:

- Anyone under the age of 18, as a matter of law, is a child (a minor);
- The College has a duty of care towards all students; in the case of minors it has an enhanced duty in certain areas. This is best thought of as a duty to 'safeguard' the young person. Safeguarding is not only a responsibility of the College as a corporate body; it is also the responsibility of individuals (Tutors and other College staff) coming into contact with the young person in the course of his/her everyday life as a student.
- The College is not acting *in loco parentis*, except in the case of a medical emergency where written permission has been previously obtained from the parent or guardian of the child.
- The College is a predominantly adult learning environment.

9.2 The College Office is responsible for ensuring that the College DSO, LSO and relevant tutors are informed of the admission of any students under the age of 18.

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

9.4 The College Office is responsible for gaining written agreement from parents and students under the age of 18 that they accept the provisions put in place.

9.5 Further details of the procedures to be followed in respect of the admissions of students under the age of 18 are set out in the College's Policy on the Admission of Undergraduates under 18.

10. **Confidentiality.**

10.1 The College has an obligation to respect the privacy and confidentiality of all individuals. Nevertheless, it is not always appropriate or sensible to promise complete confidentiality to informants in circumstances of alleged abuse. In some circumstances the College owes a duty of care to its students or visitors that cannot be fulfilled unless the College takes action on the basis of information that might have been provided in confidence. Anyone making an allegation of abuse should be assured that:

- The adult will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken.
- The adult will never tell anyone who does not have a clear 'need to know'.
- The adult will take whatever steps they can to protect the informing child or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

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

11. **Conduct around children.**

11.1 College Members should remember that inappropriate behaviour can occur via the telephone, internet and e-mail, as well as during direct interaction with children.

11.2 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;
- Giving personal gifts to children;
- Friendships conducted via social media and/or text messaging or equivalent.

11.3 Conduct never to be sanctioned:

- Engaging in rough, physical or sexually provocative games with children;
- Giving children inappropriate drugs or other inappropriate substances, including alcohol (please note that 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 to consume alcohol on a licensed premises). Members should be aware that the College holds a Premises and Club Licence;
- 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.

11.4 College Members should:

- Treat everyone with fairness, equality and respect;
- Be sensitive to children's appearance, race, culture, religious belief, sexuality, gender or disability;
- Act as a good role model and challenge any unacceptable behaviour from children or from other College Members;
- Report all allegations or suspicions of child abuse using the Procedures outlined in this Policy;
- Consider whether contact with an individual child should involve a colleague's being present;
- Be aware that physical contact with a child may be misinterpreted;
- Retain a professional approach to children, including avoiding physical contact with a child;
- Respect a child's right to privacy and, in residential accommodation, not enter a child's bedroom without prior authorisation except in the case of an emergency.

11.5 The *Sexual Offences Act* 2003 provides that intimate contact between an adult and a child, where that adult was in a 'position of trust' to the child is a criminal offence. Those in a 'position of trust' include those who have regular unsupervised contact with a child, or where an adult looks after a child at an educational institution at which the adult is not also receiving education.

11.6 It may be necessary for College Members to take photographs or make videos of children for educational research, teaching purposes, or publication. An image of a child is personal data for the purposes of the *Data Protection Act* 2008. Where images are stored in a way that makes the data subject identifiable, or where the images are used for publication (online and print), written consent should be obtained before the images are created. If the data subject is capable of comprehending the implications of consenting to the data use, then their consent should be sought; otherwise, the consent of the parent or legal guardian should be obtained. Whenever an image of a child or vulnerable adult is published, the data subject should, as far as is practicable, be unidentifiable.

12. **People with Specific Responsibility for Child Protection and their Roles.**

12.1 The designated staff (the Lead Safeguarding Officer or Designated Safeguarding Officer) are responsible for:

- Procedure.
- Holding and being conversant with current local and national Child Protection procedures.
- Keeping up to date through training. It is a requirement that this takes place at least every three years (this being the usual term of office for the Dean) and that individuals assuming the role of Dean be trained as part of the induction process.
- Reviewing and updating the College's Safeguarding and Child Protection Policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without undue delay.
- Liaison over safeguarding matters with the local Social Services Department.

- Briefing and guiding those in regular contact with children in College on Safeguarding matters. This includes the briefing of new staff as part of their induction.
- Keeping close contact with all staff and maintaining awareness of Safeguarding and the need to raise any concerns immediately with the LSO or the DSO.
- Ensuring that the Safeguarding procedures are followed within the College, that each Member has access to the procedures and has an understanding of them.
- The Safeguarding procedures may be made available to parents and teachers of children working with the College on request.
- Referrals, receiving reports of alleged or suspected child abuse within the College, or reported by a child relating to incidents at home or outside the College, contacting the Social Services Department, and/or taking any other action in response, as set out below:
- Keeping records;
- Liaising with the staff;
- Liaising with the LSO.

12.2 The Governing Body is responsible for undertaking periodic review of:

- The College's Safeguarding policy and procedures.
- The efficiency with which the related duties have been discharged.

13. Training.

13.1 Any member of the College who will be planning activities with children should have completed the on-line training provided by Oxford Safeguarding Children Board (http://www.oscb.org.uk/training/) An Introduction to Safeguarding, together with any additional training that may have been identified by the risk assessment process.

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

13.3 Activity organisers (for example, involving residential courses for young people) may wish to arrange additional training.

13.4 In addition to annual update Child Protection briefings to all Members, student helpers are to be trained annually.

14. Contact Information.

14.1 Lead Safeguarding Officer: Professor Mark Wilson, College Dean

14.2 Designated Safeguarding Officer: Mr Kris Sadler, Domestic Bursar, Dr Simon Smith (from 19th December 2025 Ms Freyja Madsen), Senior Tutor

14.3 Oxfordshire Children's Social Care Tel. 01865 323048 (Office Hours) Tel. 0800 833408 (Out of Hours)

14.4 Oxfordshire Safeguarding Children Board: Jo Lloyd lado.safeguardingchildren@oxfordshire.gov.uk Tel. 01865 810603

14.5 Police Child Protection Unit Tel. 01865 335199

14.6 NSPCC Helpline Tel. 0800 800 5000 (24 hours)

15. External Links.

Oxfordshire Multi-Agency Safeguarding Hub:
https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub
For children: Oxfordshire Safeguarding Children Partnership: www.oscp.org.uk/ For at risk adults: Oxfordshire Safeguarding Adult's Board: www.osab.org.uk/

16. **University Links.**

A list of the University's key policies can be found at: https://legal.admin.ox.ac.uk/statutes
The following are of particular relevance:
University Harassment Policy and Procedure:
https://edu.admin.ox.ac.uk/harassment-advice
University Equality Policy:
https://edu.admin.ox.ac.uk/equality-policy
University Data Protection Policy:
https://compliance.admin.ox.ac.uk/
University Public Interest Disclosure ('whistleblowing') code of practice:
https://hr.admin.ox.ac.uk/public-interest-disclosure-whistle-blowing-code-of-practice#collapse1330836
Safety Office: Health and Safety of young people and children:
https://safety.web.ox.ac.uk/young-people-and-children
Policy on the ethical conduct of research involving human participants and personal data:
https://researchsupport.admin.ox.ac.uk/governance/ethics/committees/policy
Staff-student relationships:
https://hr.admin.ox.ac.uk/staff-student-relationships
IT guidelines on handling illegal material:
https://help.it.ox.ac.uk/guidelines-for-handling-illegal-material
Personnel guidance relating to recruitment and pre-employment screening can be found on the Personnel Services website (https://hr.admin.ox.ac.uk/)

The Dean as Head of Safeguarding is responsible for maintaining this policy and ensuring it remains relevant.