



Title:	Safeguarding Policy
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Approved by:	Senior Management Team
Policy owner:	College Manager

WaterBear is a College of Falmouth University and as such its students are students of Falmouth University, studying at WaterBear. All WaterBear policies and procedures have been tailored to best suit the specific requirements of the College, its students and staff. In some instances, Falmouth policies and procedures may be deferred to for additional guidance, or where Falmouth policy has been deemed to cover both the requirements of the University's operations and those of its academic partners.

THIS DOCUMENT SETS OUT WATERBEAR'S APPROACH TO THE SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS WITHIN THE COLLEGE'S PREMISES AND WHEN UNDERTAKING COLLEGE LED ACTIVITIES.

1. Scope

The policy, procedures, and accompanying guidance apply to all:

- Students, and staff of the College;
- Consultants, contractors and contracted representatives of the College
- College collaborative partners (except where their existing policies apply and are deemed to be acceptable);
- Visitors / external organisations engaged with the College, including those contracted to conduct their own business on College premises (e.g. building contractors);
- Activities at external location(s) where staff and students are involved in College-led activity;
- College-led activity for non-students;
- Those hiring any College facilities for the provision of services or activities that may involve children or vulnerable adults

All individuals covered by this policy should ensure that they read the policy and understand the standards expected of them and their responsibilities. All individuals have a responsibility to ensure the health, safety and wellbeing of children and vulnerable adults and to take appropriate steps (including those set out in this policy) to ensure that suspicions and allegations of abuse are taken seriously and responded to swiftly and appropriately.

The College may require any external organisation (whether as contractor or partner) to have appropriate safeguarding policies and procedures in place as a condition of its engagement with that external organisation.

2. Purpose

WaterBear is committed to safeguarding and promoting the health, safety and wellbeing of children and vulnerable adults and takes its legal duties extremely seriously. The College is not however 'in loco parentis' (in the place of the parent) and cannot accept the responsibilities of guardian to any member of its community or user of its amenities. Whilst the College is an adult environment, the institution could engage in a range of activities that, from time to time, involve working with vulnerable adults or children.

The College has developed this policy and procedures, and accompanying Guidance to protect and support its staff, students, and visitors, in order that the College continues to

be a rewarding, respectful, and safe environment in which to work, study, and visit. The purpose of the policy is to assist the College in discharging its duties and commitments in respect of safeguarding children and vulnerable adults in College-led activities fully, effectively and in accordance with statutory guidance.

Together with its related Guidance the policy aims to:

- Provide a safe environment for all during College-led activities;
- Raise awareness of issues relating to the welfare of children and vulnerable adults and promote their welfare;
- Provide staff, students, volunteers, and third parties working for or with the College (or undertaking activity on its premises) with procedures they should follow, including those they should adopt in the event of incidents involving children and/or vulnerable adults and/or if they suspect that a member of one of these groups may be experiencing, or is at risk of, harm;
- Provide guidance on good practice for working with children and vulnerable adults.

3. Definitions

For the purpose of this policy and procedure, the following definitions apply:

- 'Child' means anyone under the age of 18;
- 'Vulnerable adult' refers to a person over the age of 18 who is or may be in need of services by reason of mental or other disability, age or illness; or 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;
- 'Regulated activity' would include unsupervised teaching, training, instructing, supervising, caring for, providing advice/guidance on wellbeing for, or driving a vehicle for (where the vehicle is only for children) where this is a frequent, intensive, or overnight requirement.
- 'Abuse' is defined by way of the examples included at Appendix 2.

4. Management Roles and Responsibilities

This section summarises the members of staff and committees which have particular responsibility for safeguarding children and vulnerable adults. The contact details of each individual are included in Appendix 3.

4.1 The Senior Management Team (SMT)

The Safeguarding Policy is approved by the SMT which will review and monitor the implementation, including:

- reviewing this policy on an annual basis to ensure that it continues to accord with statutory requirements and local authority guidance
- consider all breaches of this policy to inform future; and
- provide assurance to the Board of Directors that the College's statutory duties are being discharged.

4.2 Lead Safeguarding Officer

The College's LSgO is the Student Wellbeing Manager. The Senior Management Team, together with the LSgO are the strategic leaders on the College's safeguarding duties, and are responsible for:

- the implementation, monitoring, and review of the College's safeguarding policy, procedure and guidance;
- ensuring that the operation of the College's approach to safeguarding is sufficiently resourced in order that the College may fulfill its statutory obligations and the

requirements of this policy.

4.3 Principal Safeguarding Officer (PSO)

The College PSO for staff-related incidents and allegations is the College Manager. The College PSO for student-related incidents and allegations is the College Manager, (or, exceptionally deputised to an appropriately trained colleague in Student Wellbeing)

The PSO is an operational role, responsible for:

- Reviewing reports of safeguarding concerns and, as appropriate, referring incidents/allegations/disclosures involving children or vulnerable adults to the appropriate support services and/or external agencies;
- Where required, liaising with and assisting support services and/or external agencies in their investigations;
- Ensuring that incidents/allegations/disclosures are recorded and archived accordingly; and
- Maintaining a log of all reported breaches of this policy and actions/outcomes.

The College's Estates Manager is responsible for:

- Providing guidance on how to complete a risk assessment.

5. Training

All College staff undertake mandatory Safeguarding Awareness e-training. Records of completion are maintained by SMT members. PSOs must attend appropriate in-house training and additional appropriate higher level certificated training as required by the College. Additional training needs will be identified through the appraisal process and/or through role analysis (including additional responsibilities), with regular reviews.

The College may require a DBS check as a result of a risk assessment on any activity as part of additional identified controls.

6. Record Keeping

The College will keep accurate records of checks and outcomes. All records are maintained in compliance with General Data Protection Regulation (GDPR) (2018).

7. Risk Assessments and Safeguarding Arrangements

A risk-based approach must be taken to ensure any potential safeguarding issues are considered in the planning of courses, modules and related activity.

8. Recruitment of staff and students

The College will take appropriate steps in relation to the recruitment of staff (through conducting appropriate recruitment checks), to ensure that unsuitable people are prevented from working with students. Students are required to disclose criminal convictions.

9. Procedures for Planning and Managing Activity Involving Vulnerable Adults who are Students

The Programme Officer must ensure a risk assessment has been undertaken prior to the activity taking place and appropriate records are kept

In addition to mandatory 'Awareness E-training', staff and/or students involved in the activity must be familiar with the following policies, procedures, and guidance:

- Safeguarding Policy
- Procedures for reporting an incident, allegation, or disclosure

10. Safeguarding Arrangements for Children and Vulnerable Adults who are not Students

The safeguarding of children or vulnerable adults visiting the College is the responsibility of the organiser of the activities in which the children or vulnerable adults are participating. This includes Summer Schools and organised visits. Where the College is not formally the organiser of the activities, it accepts no liability related to safeguarding matters.

It is the responsibility of the organiser of activities to ensure that appropriate staff and volunteers are DBS checked and comprehensive risk assessments are undertaken in relation to the health, safety and wellbeing of children participating in activities on the College campus.

Where the College is the not the organiser of the activities (e.g. where College facilities are being hired), fully completed risk assessment documentation and assurances regarding completion of DBS checking procedures may be required before any booking may be confirmed.

11. Procedures for Dealing with Incidents, Allegations or Suspicions of Abuse and Procedures for Reporting Concerns

If an individual is alerted to concerns or receives an allegation of abuse regarding another individual studying or working for or with the College they should report this immediately to the designated member of staff as described in the relevant section below. They should not investigate concerns or allegations of abuse, but should report them immediately to the designated member of staff.

The definition of abuse for the purposes of this policy (which is consistent with the definitions included in Working Together to Safeguard Children (HM Government, March 2015) is included in Appendix 2.

If an individual is informed by a child or vulnerable adult about possible abuse or receives a disclosure of issues which indicate potential abuse, they should:

- listen carefully and stay calm;
- not interview the child or vulnerable adult, but question normally and without pressure, in order to be sure that they understand what the child or vulnerable adult is telling them;
- not put words into the child's or vulnerable adult's mouth;
- reassure the child or vulnerable adult that by telling them they have done the right thing;
- inform the child or vulnerable adult that they must pass the information on, but that only those that need to know about it will be told;
- inform them of to whom they will report the matter;
- note the main points carefully;
- make a detailed note of the date, time, place, what the child said, did and their questions.

In URGENT cases, where you have an immediate concern about the welfare of a child or vulnerable adult who may be at risk, you must make direct contact with the police or other appropriate emergency service by calling 101 or 999 as appropriate, or via the Children's Services Multi-Agency Referral Unit (MARU) who can be contacted on 0300 1231 116 or 01208 251 300 out of hours.

- Have their name, and if possible their address and address of their parent/guardian/carer available.
- Refer to your notes – don't filter or withhold any information.
- You have no right to detain the child or vulnerable adult, but you should provide a "place of safety", if possible, until the police, appropriate emergency service or local authority assumes responsibility.

12. Procedures for Dealing with Incidents, Allegations or Suspicions of Abuse Regarding an Employee of the College

The person(s) who has witnessed or suspects abuse by an employee, or to whom the allegation has been disclosed, should notify the PSO immediately. The person(s) concerned must write a report to be sent to the PSO as soon after the incident, suspicion or allegation as is practicable (where there is an allegation against the PSO, the report should be sent to the CEO

The PSO will contact the Multi-Agency Referral Unit (contact details in section 13) for concerns relating to children, or the Adult Safeguarding Access Team (0300 1234 131) for concerns relating to vulnerable adults, to establish whether the case requires further investigation and at what level. The outcome of this contact may include:

- No further action necessary.
- Further investigation by vulnerable adult / child protection agencies and/or internal College procedures.
- Immediate referral to vulnerable adult / child protection agencies

Where an immediate referral to vulnerable adult or child protection agencies is made, the PSO is not required to be part of the investigating team, but will normally be expected to

contribute to discussions on how the investigation will be conducted. The PSO will, as appropriate, keep relevant line managers and Falmouth University informed on the progress of the investigation throughout.

Depending on the circumstances, it may be necessary for the College to stay the investigation or consideration of matters under the College's internal procedures pending the completion of an investigation and/or action by the child protection agencies and/or police.

13. Procedures for Dealing with Incidents, Allegations or Suspicions of Abuse Regarding a Student of the College

The person(s) who has witnessed or suspects abuse by a student, or to whom the allegation has been disclosed, should notify the PSO immediately. The person(s) concerned should write a report as per the guidance on reporting, which should be sent to the PSO as soon after the incident, suspicion or allegation as is practicable (where there is an allegation against the PSO, the report should be sent to the CEO).

The PSO will contact the Multi-Agency Referral Unit (contact details in section 13) for concerns relating to children, or the Adult Safeguarding Access Team (0300 1234 131) for concerns relating to vulnerable adults, to establish whether the case requires further investigation and at what level.

The outcome of this contact may include:

- No further action necessary.
- Further investigation by vulnerable adult / child protection agencies and/or internal College procedures.
- Immediate referral to vulnerable adult / child protection agencies.

Where an immediate referral to vulnerable adult or child protection agencies is made, the PSO is not required to be part of the investigating team, but will normally be expected to contribute to discussions on how the investigation will be conducted. The PSO will, as appropriate, keep relevant members of staff, including Directors of Department, Personal Tutors, and Student Administration informed on the progress of the investigation throughout.

Depending on the circumstances, it may be necessary for the College to stay the investigation or consideration of matters under the College's internal procedures pending the completion of an investigation and/or action by the child or vulnerable adult protection agencies and/or police.

14. Procedures for Dealing with Incidents, Allegations or Suspicions of Abuse Involving a Visitor / External Organisation Using the College's Facilities*

(*including under 18s undertaking a College-led activity, who are not covered by the relevant organisation's safeguarding arrangements)

The person(s) who has witnessed or suspects abuse, or to whom the allegation has been disclosed, should notify the PSO immediately for advice. Following the completion of vulnerable adult or child protection agency procedures (as applicable), the PSO, in consultation with the LSgO, will determine whether the visitor/external organisation will be permitted to continue using WaterBear facilities.

15. Confidentiality

All individuals covered by this policy must be mindful, and remain mindful, of the importance of ensuring that confidentiality is, where possible, maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

16. Related Policies and Procedures and Monitoring and Review

The College policies listed below are also relevant in seeking to ensure the health, safety and wellbeing of children and vulnerable adults:

Data Protection Policy

Health and Safety Policy

The College shall review this policy and procedure regularly to ensure that it continues to meet legal requirements and reflects best practice.

Appendix 1: List of Activities

Activities that may involve children or adults at risk, and should be risk assessed, include, but are not limited to:

- teaching, supervision, and support of enrolled students who are adults at risk;
- overnight residential events organised by the College, without parents or teachers on site;
- summer schools / short courses / events organised by the College;
- work experience, internships, and employment of under 18s by the College;
- students on work placements in schools and colleges;
- school and college pupils visiting the College for events/open days;
- enhancement, outreach, and recruitment activity with schools and colleges;
- use of College facilities by external organisations

- 1:1 meetings with prospective students;
- Community events and festivals where children may attend with or without parents.

Any online engagement with children and adults at risk is also included within the scope of this policy.

Appendix 2: Definitions of Abuse

The definition of abuse for the purposes of this policy and procedure (which is consistent with the definitions in Working Together to Safeguard Children (HM Government, March 2015) includes:

Physical abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It may be caused when an individual fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

Neglect - the persistent failure to meet the basic physical and/or psychological needs of a child or vulnerable adult, likely to result in the serious impairment of their health or development. Neglect may involve failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 - protect a child or vulnerable adult from physical and emotional harm or danger
 - ensure adequate supervision (including the use of inadequate care-givers); or
 - ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, the basic emotional needs of a

child or vulnerable adult.

Sexual abuse – involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving the individual in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.

Emotional abuse – the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to a child or vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond a child's or vulnerable adult's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, though it may occur alone.

The above is a non-exhaustive list and there may be other forms of abuse, or examples of abuse, which require action under this policy and procedure.

Appendix 3: Contact Details of Individuals with Specific Safeguarding Duties

Principal Safeguarding Officer – staff	Brighton – Karl Middleton Karl@waterbear.org.uk Sheffield – Steve Cobain
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	Steve@waterbear.org.uk
Lead Safeguarding Officer	Mike Ross – Student Wellbeing Manager Mike@waterbear.org.uk
Children’s Services Multi Agency Referral Unit	
Brighton: Front Door for Families	01273 290400 FrontDoorforFamilies@brighton-hove.gov.uk
Sheffield: MAST (Multi Agency Support Team)	0114 2037485 www.sheffield.gov.uk/social-care/multi-agency-support-teams
National Number 24hrs a day	0300 1234 131
Adult Safeguarding Partnership	
Brighton: Access Point	01273 29 55 55 hascsafeguardinghub@brighton-hove.gov.uk
Sheffield Adult Safeguarding Partnership	0114 273 4908
National Number 24hrs a day	0300 1234 131

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