

# Exeter College

## Safeguarding and Protection

### Responding to Suspicions and Disclosures

The purpose of this policy is to set out how the College responds to disclosures of harm, or suspicions of harm to any of its members, whether they are a student, staff or Fellow.

Throughout this policy, the Deputy Safeguarding, Protection & Harassment Lead may act in place of the Safeguarding, Protection & Harassment Lead (SPH Lead), where the Safeguarding, Protection & Harassment Lead is unavailable, or otherwise unable to act (for example, if they have a conflict of interest)

#### Definitions

*Member of the College:* any student, member of staff, or any type of Fellow

*Harm* includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural); self-harm and neglect; unlawful conduct which adversely affects a person's property, rights or interests (for example, financial abuse).

*Disclosure:* when a person tells another person that they are being harmed or are at risk of being harmed

*Suspicion:* where a person suspects that another person is being harmed or is at risk of being harmed by a third party, perhaps because of something they have said, a change in behaviour or because they have seen e.g. unexplained bruising.

*Adult at risk of harm:* is an adult who 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. (previously known as a vulnerable adult).

#### Adults

Where adults are concerned, the College's policy is that they have the right to live their life as they choose, and to take responsibility for deciding when and how to seek help.

Any member of College who suspects or is actually aware that another member of College is at risk of any harm, be that physical, emotional, or the result of neglect should advise the individual to seek help from the usual channels: doctor, police, manager etc.

The only exception to this is where a member of College learns that another member is at risk of death (e.g. because of suicidal thoughts) or serious harm (e.g. because of repeated domestic violence), and where, in their opinion, that person lacked the capacity to make reasonable decisions about their own safety. In that case, they should report the matter to:

- the Welfare Lead for concerns about a student;
- the HR Manager for concerns about any employee;
- the Rector for concerns about any sort of Fellow or about the HR Manager, or anyone not otherwise listed here;

- the Sub Rector for concerns about the Rector.

These people (Primary Contacts) will treat the matter in confidence. If their concern represents a statutory Safeguarding matter, they **must** refer the matter to the SPH Lead. Where the alleged perpetrator is a member of College, the Primary Contact **must** inform the SPH Lead.

The purpose of this is both to protect an individual who may be at risk and unable to make rational decisions about their own safety, and to allow concerns about such a person to be gathered by one person as well as to implement the College's statutory Safeguarding duty.

## Under 18s

### *Students*

Where any member of College has safeguarding concerns about a student who is under the age of 18, they should report it to the Welfare Lead, who **must** refer it to the SPH Lead.

### *Participants in Residential Activities / Admissions interview period*

The Safeguarding responsibilities for Residential Events, and the Admissions interview period, is set out in the College's "presence of under-18s on-site" policy.

The Safeguarding Officer for Residential Activities is the Outreach and Access Officer. The Safeguarding Officer for the Admissions interview period is the Admissions Officer.

Where the relevant College Safeguarding Officer retains the responsibility for Safeguarding at any residential activity, they should ensure that any suspicions raised, or disclosures made, are acted upon as per the College's reporting procedure (see Annexe A).

### *Staff*

Any member of College who believes that a member of staff who is under 18 is at actual or potential risk of harm should report it to the HR Manager, who **must** refer it to the SPH Lead.

### *Action*

As described in Annex A, the SPH Lead will keep a record of all referrals made to them about under 18s, and any follow up action taken. The SPH Lead is responsible for deciding whether any referral to an outside agency is needed.

## Overlap with Harassment and Grievance Procedures

The College has a harassment procedure that sets out the standards of behaviour it requires of members and how the College will respond to complaints by student and staff about the behaviour of others. Harassment is not automatically a safeguarding concern: but it may be when the person being harassed is under 18, or where there is a significant power imbalance between the parties.

The College also has a grievance policy covering work related matters. A central record of grievance cases is kept by the HR Manager who will assess whether there is a safeguarding implication.

## Annexe A: College reporting procedure for dealing with suspicions or disclosures of harm

Those working with children and adults at risk may:

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

Whilst these issues may require very different courses of action, it is essential that the safety and welfare of possible victims of abuse is prioritised.

Any suspicions or disclosures of harm must be reported without delay to the Primary Contact as described in the body of this policy. The Primary Contacts are responsible for ensuring that concerns and allegations are escalated to the SPH Lead as set out in this policy.

Where the alleged perpetrator of harm is also a member of College, then the Primary Contact **must** inform the SPH Lead.

### *Responsibilities of Safeguarding and Harassment Lead*

- Where anyone under 18, or an adult at risk of harm, discloses alleged harm, or a member of the College suspects harm, the SPH Lead will assess and, where appropriate, contact the relevant statutory agency for advice.
- an allegation is made against College Fellows, staff, students, volunteers, or academic visitors, the SPH Lead will assess and, where appropriate in cases involving children, refer the matter to the Multi-Agency Safeguarding Hub. This referral must be made within one working day of the allegations being made. The Local Area Designated Officer will advise on the appropriate action to be taken. In cases involving adults at risk of harm, referral will be made to the relevant statutory agency.
- **In the event there is a risk of immediate serious harm to a child or an adult the emergency services should be contacted via 999 or the police via the 101 service.** Anybody can make a referral in these circumstances. The designated Safeguarding Officer for the particular activity and the Safeguarding Lead should then be notified of the case.

The SPH Lead will normally consult with the Safeguarding, Protection and Harassment Committee, or with members of it, to consider which polices are applicable and to determine the correct action to take. The SPH Lead must keep a record of all referrals made to them and actions taken.

The SPH Lead will share information as appropriate with relevant colleagues to ensure that the relevant authorities both within and outside of the College are involved and that any necessary processes can be followed (for example, depending on the nature of the allegations, it may be necessary to make a disclosure to the Disclosure and Barring Service.)

Appropriate records will be retained in accordance with the College's and the University's Data Protection Policies. Where the matter may relate to both Fellows/staff and students, the SPH Lead will agree on where the file will be kept.

By College Order 23/118, this policy was approved by Governing Body on date with immediate effect and is to be reviewed by 31<sup>st</sup> December 2026, and was also approved for display on the website.

