



Cambridge Muslim College

Safeguarding Children and Vulnerable Adults Policy

Policy Owner: Operations Department

Date of next review: June 2023

1. Purpose

- 1.1 This policy sets out Cambridge Muslim's College commitment to providing a safe environment for children and adults at risk.
- 1.2 A 'child' is any person under the age of 18. Particular care should be afforded to a child under the age of 16.
- 1.3 An 'adult at risk' is defined by the Department of Health 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."
- 1.4 This policy seeks to support activities involving adults at risk and children and to offer assurances to staff, students, volunteers and visitors that safeguarding will be dealt with effectively and in a timely manner.
- 1.5 This policy seeks to:
 - 1.5.1 promote and prioritise the safety and wellbeing of everyone, particularly children and adults who may be at risk;
 - 1.5.2 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;
 - 1.5.3 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;
 - 1.5.4 manage effectively the risks associated with activities and events involving children and adults at risk.

2. Scope

- 2.1. The College's 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 potential events and activities organised by its students. Such activities with children include open days, schools visiting the College, applicant visits, interviews, recruitment and with our staff and students visiting schools and outreach cultural activities.
- 2.3. It also covers the interactions between students and the Welfare Officer and visits from members of the public.
- 2.4. 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 outline their responsibility for the safeguarding of individuals involved in any related activities. The College will verify with the external body that they have safeguarding policies in place before confirming their booking.

3. Principles

- 3.1 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 may encounter children adults at risk through its teaching and cultural activities, as well as through its recruitment and outreach programmes

4. Responsibility

- 4.1 The College has nominated safeguarding officers who will work with other agencies where appropriate to achieve the aims of this policy.
 - 4.1.1 The designated Safeguarding Lead Officer is the Operations Manager
The Safeguarding Officers are 1) the BA Programme Officer and 2) The Student Welfare Officer. The role of the safeguarding lead and the safeguarding officers is detailed in Annexe A.
 - 4.1.2 As such, they take overall ownership of the policy and will promote the importance of safeguarding within the College.
 - 4.1.3 Where allegations relate to one of the Safeguarding Officers or the Safeguarding Lead, this will be considered independently by the Principal.
- 4.2 It is essential that any concerns are reported to the Safeguarding team 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 Each Director will lead on promoting safeguarding within their Department and are accountable for the adoption and implementation of this policy and for.

5. Planning Activities

- 5.1 Any member of the College who has responsibility for organising an activity involving children must nominate an individual to act as the designated Safeguarding Lead Officer for the activity. Activities should:
- 5.1.1 be designed so that appropriate training (via the College's online package) and supervision is available to those working with adults at risk or children;
 - 5.1.2 minimise occasions on which members of the College will need to work alone in an unsupervised way with adults at risk or children; and
 - 5.1.3 be appropriately risk assessed using the College's risk assessment form.

6. Risk Assessment

- 6.1 It is the responsibility of the relevant Director to ensure:
- 6.1.1 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);
 - 6.1.2 Guidance on health and safety for young people can be obtained from the College's Health and Safety Officer;
 - 6.1.3 that completed risk assessments are made available to employees, workers, volunteers or students who are involved in the activity; and
 - 6.1.4 that the implementation and review of actions identified within a risk assessment is undertaken in a timely manner.
- 6.15 that the College will set out risks identified, and how they will manage them, in a risk register which is regularly reviewed.

7. Induction and Training

- 7.1 It is the responsibility of the Operations Director to:
- 7.1.1 Ensure that any employee, worker, volunteer, student working on behalf of the College within their area is made aware of the existence of this policy and asked to familiarise themselves with the contents as part of their induction.
 - 7.1.2 Ensure that any employee, worker, volunteer, student working on behalf of the College completes safeguarding training, together with any additional training that may have been identified by any relevant risk assessment processes.

- 7.2.2 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 (Enhanced DBS) checks

- 8.1 Enhanced DBS checks will be undertaken when recruiting to the roles of Principal, Admissions Tutor(s), Operations Director, Operations Manager, Building and Facilities Manager, BA Programme Officer and Student Welfare Officer.
- 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 Operations Director to:
- 8.3.1 Inform the Operations Manager when an Enhanced 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;
- 8.3.2 Discuss with the Operations Manager if uncertain whether a check is required to ensure appropriate checks are carried out.
- 8.4 In liaison with the relevant authorities, the Safeguarding Lead Officer will undertake a referral to the DBS if an employee:
- 8.4.1 Have had their employment with the College terminated because they harmed someone;
- 8.4.2 Have had their employment with the College terminated or job role limited because they might have harmed someone; or
- 8.4.3 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 The College does not normally register students under the age of 18. The College is not able to act in loco parentis in relation to students who are under the age of 18 years. However, if a situation arises where a student is under the age of 18 at the time of registration, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision:
- 9.1.1 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 Lecturers at meetings may be necessary.

- 9.1.2 IT – Use of the internet by under-18s for study will be as for all students.
- 9.1.3 Student arranged activities – 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.
- 9.1.4 Liaison with Departments – the College will inform/consult with the relevant Department as early as possible about any student who will be under the age of 18 who is being admitted so that the College 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.

10. Raising a concern of allegation of abuse

- 10.1 Any person involved in the work of the College (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 or another senior member of the College or directly to a member of the Safeguarding team. If reported to the former, they will escalate the matter to the Safeguarding team as a matter of course. The College offers a series of options to raise a concern or allegation of abuse.

Abuse is defined by the '[Keeping Children Safe In Education Guidance](#)' as 'a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.'

- 10.1.1 The Safeguarding Report Form (Annexe B) should be completed by the person raising the concern and passed to one of the College's Safeguarding team.
- 10.1.2 By email to welfare@cambridgemuslimcollege.ac.uk. This box is monitored by the Student Welfare Officer who is also a Safeguarding Officer.
- 10.1.3 Telephoning 01223 355235 and, if necessary, leaving a message for the Safeguarding team.
- 10.1.4 The anonymous form in the College Virtual Learning Environment for students and the College Sharepoint site for staff.
- 10.1.5 Staff Guidance on safeguarding is detailed in Annexe C

11. Procedure for dealing with suspicions or allegations of abuse

- 11.1 Those working with children or adults at risk and engaged in regulated activities may:

- 11.1.1 have alleged abuse disclosed to them;
 - 11.1.2 suspect abuse is being carried out; or
 - 11.1.3 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 Safeguarding Lead Officer has responsibility for ensuring that they (or the Safeguarding Officer) are available during normal working hours to respond to allegations without delay, and for procedures to be in place should issue arise outside of normal working hours. Unless there is risk of immediate harm (see 11.4 below), the Safeguarding Report Form (Annexe B) should be completed and passed to the Safeguarding Lead 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 links:

children: <https://www.peterboroughlscb.org.uk/children-board/reporting-concerns/>;
adults: <https://www.safeguardingcambspeterborough.org.uk/concerned/>.

The Safeguarding Lead Officer 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 Safeguarding Lead Officer (or the Safeguarding Officer) who will consider what action is required. Where there is a report of a concern, the Safeguarding Lead Officer will raise it with local safeguarding within one working day of the allegation(s) being made. 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 Safeguarding Lead Officer is privy to all concerns as they arise.
- 11.6 Appropriate records will be retained by the Safeguarding Lead Officer in accordance with the College's Data Protection Policy. Where the matter relates to both staff and students, the Safeguarding Lead Officer will determine where the file should be kept.
- 11.7 In consultation with the Principal, Operations Director or Academic Director the Safeguarding Lead Officer (or the Safeguarding Officer) will be responsible for contacting any statutory agencies such as the Cambridgeshire and Peterborough

Safeguarding Children or Safeguarding Adults Partnership Board or the Police, if necessary. The Safeguarding Lead Officer (or the Safeguarding Officer) will also have responsibility for fulfilling any legal obligations to provide a referral of an individual to the DBS and advise the Charity Commission of any serious incidents providing an overview of action taken.

- 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 to do one or more of the following:
 - 11.9.1 move the victim of an alleged safeguarding breach to a safe place;
 - 11.9.2 suspend the individual(s) about whom an allegation or suspicion has arisen;
 - 11.9.3 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 which are available via <https://www.cambridgemuslimcollege.ac.uk/policies/> :
 - 12.1.1 Staff Handbook AY21-22
 - 12.1.2 Health and Safety Policy
 - 12.1.3 Whistleblowing Policy
 - 12.1.4 Confidentiality Policy
 - 12.1.5 Data Protection Policy
 - 12.5.6 Extenuating Circumstances Policy
 - 12.5.7 Staff Disciplinary Policy
 - 12.5.8 Harassment and Bullying & Sexual Misconduct Policy
 - 12.2.8 Prevent and Counter Terrorism Policy

13. Relevant Legislation

- 13.1 The following legislation is relevant to this policy because it has influenced its introduction and/or its content:
 - 13.1.1 Health and Safety at Work Act 1974
 - 13.1.2 Rehabilitation of Offenders Act 1974
 - 13.1.3 Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
 - 13.1.4 The Police Act 1997
 - 13.1.5 Protection of Children Act 1999
 - 13.1.6 Management of Health and Safety at Work Regulations 1999
 - 13.1.7 The Human Rights Act 1998

- 13.1.8 Sexual Offences Act 2003
- 13.1.9 The Children Act 2004
- 13.1.10 Safeguarding Vulnerable Groups Act 2006
- 13.1.11 Equality Act 2010
- 13.1.12 Protection of Freedoms Act 2012
- 13.1.13 The Care Act 2014
- 13.1.14 Working Together to Safeguard Children 2018 (DFE Guidance)
- 13.1.15 Children and Social Work Act 2017
- 13.1.16 Keeping Children Safe in Education 2021 (DFE Guidance)

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.

14. College Prevent Duty

- 14.1 The Counter-Terrorism and Security Act 2015 places a duty on higher education institutions to have ‘due regard to the need to prevent people from being drawn into terrorism’. This commonly referred to as the ‘Prevent duty’.
- 14.2 At the same time, the College also has a legally defined role to secure freedom of speech and promote academic freedom. The balance is to ensure that the College remains a place where debate and free speech can prosper, while maintaining a safe campus community.
- 14.3 The government’s ‘Prevent Duty Guidance’ does stress that the duty is intended ‘to be implemented in a proportionate and risk-based way’. In the light of this guidance, the College has adopted the set of Prevent principles articulated by the Open University <https://479141-1506839-raikfcquaxqncofqfm.stackpathdns.com/wp-content/uploads/2020/11/100.037.01-Prevent-Duty-Policy.pdf>.

15. Relevant College Policies

- 15.1 Prevent (Counter-Terrorism) Duty Policy

19. Relevant Legislation

- 16.1 Counter-Terrorism and Security Act 2015

Revision History

Revision Number	Effective Date	Description of Change
00	March 2017	New Policy
01	July 2021	Added safeguarding lead Updated formatting Updated programme info
03	April 2022	New policy to meet OU Admin Audit conditions. Policy re-written with external professional advice from AUA Consulting.
04	June 2022	OU-required amendments (May 2022)

Annexe A

Role of Safeguarding Lead/Officer

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

The role of the Safeguarding Lead Officer and Officers is as follows:

1. To raise awareness by:
 - 1.1 Reviewing on a regular basis the activities of the College involving children or adults at risk;
 - 1.2 acting as a senior strategic figurehead for Safeguarding issues at the College;
 - 1.3 ensuring that the Safeguarding Policy is implemented, and promulgated;
 - 1.4 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:
 - 2.1 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;
 - 2.2 advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the policy;
 - 2.3 liaising with external agencies where appropriate (such as the Police or the Cambridgeshire and Peterborough Safeguarding Partnership Board); and

- 2.4 ensuring that those involved in any case are appropriately supported.

- 3. To undertake and promote appropriate training by:
 - 3.1 engaging in training to ensure that knowledge is kept up to date;
 - 3.2 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 Officer in consultation with the Operations Director will be responsible for identifying roles within the College for which an Enhanced DBS check is required.

- 5. The Safeguarding Lead Officer will report annually to Board of Trustees on matters concerning the protection of children and adults at risk and on the operation of the College’s Safeguarding Policy.

Annexe B

CMC Safeguarding Report Form

RECORD OF ALLEGATION OR SUSPICION OF ABUSE

Date & Time of Initial Report:
 To Safeguarding Officer (Name):

Name of person reporting concerns	Name and contact details of Child/Young Person/Adult in a vulnerable situation	Place of alleged abuse

Name(s) of people present:

Details of Allegation or Suspicion:

Please give as much information as about the allegation or suspicion, including if you suspect abuse what alerted your attention to the situation. Please include all names of the people involved.

Name of person reporting incident (capitals): _____

Signed: _____ Date: _____

Dept: _____

Email: _____

Please send to the Safeguarding Lead Officer, Mina Morris, BA Programme Coordinator, Zainab AlKhatib or Student Welfare Officer, Nabila Winter, or to welfare@cambridgemuslimcollege.ac.uk

Annexe C

CMC Safeguarding Guidance for Staff

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 demonstrate exemplary behaviour. .
- 1.2 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 difficulty.
- 1.3 Care should be taken to ensure that your conduct is appropriate to each circumstance and environment as well-intentioned actions can be misinterpreted.
- 1.4 All 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.
- 1.5 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 the Safeguarding team.

- 1.6 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:

- 2.1.1 Treat everyone within the College community with respect;
- 2.1.2 Provide an example of good conduct for others to follow;
- 2.1.3 Ensure you have completed any required training, check if you are uncertain with the College safeguarding team and that you know what you should do if a child or adult at risk makes a disclosure to you;
- 2.1.4 Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in;
- 2.1.5 Give due regard to cultural difference;
- 2.1.6 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;
- 2.1.7 If you have to give feedback, take care that it is not unnecessarily negative;
- 2.1.8 Avoid being in a situation where you are alone with a child and make sure that others can clearly observe you;
- 2.1.9 Take care that your language is not open to sexual connotation;
- 2.1.10 Report any suspicions promptly and confidentially to the Safeguarding team.
- 2.1.11 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:

- 2.2.1 Engage in, or allow, any form of inappropriate touching.. 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);
- 2.2.2 Use inappropriate language, or allow others to use it without challenging it;
- 2.2.3 Allow yourself to be drawn into inappropriate attention-seeking behaviour;
- 2.2.4 Show favouritism to any individual;

- 2.2.5 Rely on the College's good name to protect you;
 - 2.2.6 Engage in any sexual relationship with a person to whom you are in a position Of trust, even if they give their consent;
 - 2.2.7 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 other than regarding the activity (for example through the official website for the activity);
 - 2.2.8 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;
 - 2.2.9 Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on;
 - 2.2.10 Allow personal preconceptions about people to prevent appropriate action being taken;
 - 2.2.11 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;
 - 2.2.12 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 the Safeguarding team if:
- 2.3.1 You suspect a relationship is developing which may be an abuse of trust;
 - 2.3.2 You are worried that a child or adult at risk is becoming attracted to you or a colleague;
 - 2.3.4 You think a child or adult at risk has misinterpreted something you have done or said;
 - 2.3.5 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;
 - 2.3.6 A child or adult at risk tells you that they are being abused, or describes experiences that You consider may be abuse;
 - 2.3.7 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

- 3.1 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 Safeguarding Officer 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;

- 3.2 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);
- 3.3 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 this policy;
- 3.4 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;
- 3.5 Avoid 'leading' questions, or expressing a view about what you have been told;
- 3.6 Use clear language, appropriate to the person you are dealing with;
- 3.7 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 Safeguarding Officer;
- 3.8 Complete a Safeguarding Report Form (Annexe B) and submit it to one of the College Safeguarding team. 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.