

Harlaxton Safeguarding Policy

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1. Named Staff and Contacts

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Deputy Designated Safeguarding Lead (DDSL)

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Deputy Designated Safeguarding Lead (DDSL)

DDSL Oliver Haslam (Faculty)

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Deputy Designated Safeguarding Lead (DDSL)

DDSL Name: Annie Sills (Associate Director of Institutional Equity and Title IX Coordinator)

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Deputy Designated Safeguarding Lead (DDSL)

DDSL Name: Megan Clouse (Institutional Equity and Title IX Deputy Coordinator)

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Chair of the Trustees: Henrietta Chubb

Email: hchubb@harlaxton.ac.uk

Trustee Lead: Henrietta Chubb

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External Agencies (Lincolnshire)

- Emergency Services: **999**
- Lincolnshire Children and Young People's Services (8am-6pm, Mon-Fri): **01522 782111**
 - Out-of-Hours Emergency: **01522 782333**
- Lincolnshire Adult Safeguarding reporting (8am-6pm, Mon-Fri): **01522 782155**
- Police (Non-Emergency): **101**

2. Policy Statement

Harlaxton College is a charity registered in England and Wales. It is regulated by the Charity Commission and is based on the site of Harlaxton Manor. Harlaxton Manor is a Grade I listed historic estate which is owned by separate entity, Harlaxton Manor Enterprises, which has commercial and heritage related functions. Both Harlaxton College and Harlaxton Manor Enterprises are owned by the University of Evansville. This policy applies to both Harlaxton College and Harlaxton Manor Enterprises, which are referred to collectively throughout as "Harlaxton."

Harlaxton is committed to the safety and well-being of its community, including protecting children, children and adults at risk who participate in any Harlaxton activity. This policy covers events and activities that are managed and supervised by Harlaxton and which may bring individuals into contact with children, students and adults at risk. Activities at Harlaxton include academic programmes, residential operations, and summer programmes. Harlaxton maintains a Designated Safeguarding Lead ("**DSL**") to hold overall responsibility for safeguarding and implementing this policy. Details of the DSL are set out at section 7 of this policy.

3. Reason for Policy

Harlaxton is committed to safeguarding and promoting the welfare and well-being of its beneficiaries and all those it engages with, and takes all reasonable measures to ensure that no individual comes to harm as a result of contact with Harlaxton.

The safety and welfare of everyone affected by Harlaxton's activities, especially children and adults at risk, is of the highest priority and is reflected in all that Harlaxton does.

Documents taken into consideration when formulating this policy include:

- Relevant statutory guidance issued by HM Government, including “[Keeping Children Safe in Education](#)” (2025) ("**KCSIE**"). Whilst this statutory guidance is aimed at Schools and Colleges (and so is not binding on Harlaxton), we consider this appropriate and useful guidance for Harlaxton, and while Harlaxton will not be measured against these standards, they are appropriate standards to consider in the formulation of this policy.
- Charity Commission Guidance on [safeguarding for charities and trustees](#), which outlines the responsibility of a charity to keep everyone who comes into contact with the charity safe from harm, including volunteers, staff and beneficiaries.
- Additional guidance including [What to do if You are Worried a Child is Being Abused](#) (2015); [Working Together to Safeguard Children](#) (2026) ("**Working Together**") and [Information Sharing: Advice for Practitioners](#) (2024);

Relevant legislation including:

- [The Health and Safety at Work etc. Act 1974](#)
- [The Children Act 1989](#) (and 2004 amendment), which provides a framework for the care and protection of children;
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR);
- [The Sexual Offences Act 2003](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children;

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race);
- [The Care Act 2014](#);
- [The Counter Terrorism and Security Act 2015](#);
- [The Data Protection Act 2018](#); and
- [UK General Data Protection Regulation](#)

4. Who is Governed by the Policy?

All Harlaxton staff and students are expected to be familiar with and comply with this policy at all times. For the purposes of this policy, staff means everyone employed by, working for, or volunteering at Harlaxton, including but not limited to Trustees, employees, consultants, volunteers, contractors and University of Evansville employees who conduct activities or have operational responsibility at or for Harlaxton. Students and visiting faculty, and visiting faculty's partners and children are made aware of the policy and who they should speak to if they have a concern. Students will be expected to adhere to the Code of Conduct for Children and Students in Appendix D and should be asked to sign a copy of this to confirm their agreement.

This policy applies to everyone regardless of their age, marital status, sex, gender identity, ethnicity, nationality or race, religion or belief, disability, pregnancy or maternity or sexual orientation.

Where services or activities at Harlaxton are provided under the direct supervision or management of Harlaxton, this policy will apply. However, when services or activities are instead provided by an External Group, and Harlaxton's role is limited to renting out its facilities/ premises, Harlaxton does not assume responsibility for the supervision or safeguarding of such participants. Harlaxton will seek assurances that the External Group has its own appropriate safeguarding and child protection policies and procedures in place that are suitable for the nature of the activity being delivered and will be entitled to inspect these on request as part of its safeguarding assurance processes.

Harlaxton also rents accommodation that it owns to staff members with families, which means that children may live on the Harlaxton premises. In these circumstances, parents and guardians retain responsibility for the safeguarding of their children. Harlaxton does not assume responsibility for the supervision or safeguarding of these children.

On occasion, children may also be present at special events taking place at Harlaxton, such as weddings. Where such children are not attending as part of an External Group programme, they should be accompanied by a parent, guardian or some other adult who will be responsible for their safety and wellbeing. Harlaxton does not assume responsibility for the supervision or safeguarding of these children. Any risk assessment undertaken for such events must consider the safeguarding of those children in attendance. See section 18 for more information.

5. Definitions

Abuse: A form of maltreatment where a child or adult at risk is harmed, or placed at risk of harm, by an adult or another child, either through inflicting harm or through a failure to prevent harm. Abuse may include the following:

- **Physical Abuse** — Non-accidental physical force causing harm, such as hitting, shaking, throwing, poisoning, burning, or suffocating.
 - **Emotional Abuse** — Persistent emotional maltreatment causing severe and adverse effects on emotional development, including bullying, humiliation, or exposure to domestic abuse.
- Sexual Abuse** — Forcing or enticing a child or adult at risk to take part in sexual activities, whether physical or non-contact (e.g., grooming, exposure to sexual images), regardless of awareness.

Adult at Risk : means individuals over the age of 18 who are or may be in need of community care services by reason of disability, sensory impairment, age or illness, and who are or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Barred Lists: The Children's Barred List and Adults' Barred List maintained by the DBS. Individuals on these lists must not engage in Regulated Activity.

Child / Children: A person or people under the age of 18.

Child-on-Child Abuse: Abuse of one or more children against another child, including but not limited to bullying, sexual harassment, sexual violence, harmful sexual behaviour, initiation/hazing, coercive control, online abuse, and exploitation.

Contractor: A self-employed individual or business providing services to clients under a "contract for services" rather than a contract of employment.

Day-Only Setting: Any programme involving children where no overnight accommodation is provided.

Disclosure and Barring Service ("DBS"): The UK body responsible for criminal record checks and maintaining the Children's and Adults' Barred Lists.

External Group: An organisation, group or individual that hires Harlaxton's facilities or premises to deliver its own activities, where Harlaxton's role is limited to the provision of facilities and Harlaxton does not have direct supervision or management responsibility for participants.

Harm: Ill-treatment or impairment of health or development (physical, intellectual, emotional, social, or behavioural), including harm suffered from witnessing ill-treatment of others.

Local Authority Designated Officer ("LADO"): The statutory officer responsible for managing allegations against adults who work with children.

Low-Level Concern: Any concern about an adult's conduct toward a child that does not meet the threshold for a LADO referral but may indicate a breach of professional boundaries, as described in KCSIE.

Neglect: The persistent failure to meet basic physical or psychological needs, likely to result in serious impairment of health or development.

Online Safety: Protection from online risks including grooming, sexual exploitation, radicalisation, cyberbullying, exposure to harmful content, and misuse of digital communication platforms.

Prevent Duty: The statutory duty to have due regard to preventing people from being drawn into terrorism, including identifying concerns, reporting to the DSL, and making Channel referrals where appropriate.

Regulated Activity (Children): Unsupervised activities in the Harlaxton context including teaching, training, instruction, care, supervision, or advice provided to children, when carried out frequently (once a week or more), intensively (four days in 30), or overnight between 2am and 6am.

Regulated Activity (Adults): Activities including the provision of personal care, healthcare, social work, assistance with household or financial matters, assistance in the conduct of an adult's own affairs, or conveying an adult to or from health or social care services.

Residential Setting: Any Harlaxton-operated or Harlaxton-hosted programme in which children stay overnight on Harlaxton premises.

Risk Register: A dynamic document used by Harlaxton to identify, assess, and manage risks to children and adults at risk.

Safeguarding: Proactive measures to protect a child or adult at risk's health, well-being, and human rights, enabling them to live free from harm, abuse, and neglect.

Section 42 Care Act 2014: The requirement for Local Authorities to make enquiries where there is reasonable cause to suspect an adult with care and support needs is experiencing abuse or neglect and cannot protect themselves.

Sexual Exploitation, Abuse and Harassment (SEAH)

- **Sexual Exploitation (SEA)** — Taking advantage of a power imbalance to coerce or manipulate someone into sexual activity, including profiting from such exploitation. Child Sexual Exploitation (CSE) involves manipulating a person under 18 into sexual activity, even if it appears consensual.
- **Sexual Abuse** — Any non-consensual sexual activity, including sexual assault and rape. For children, this includes being forced or enticed into sexual activity.
- **Sexual Harassment (SH)** — Unwanted sexual behaviour (verbal, physical, or non-physical) that causes intimidation, humiliation, fear, or offence, including unwanted touching, sexual comments, or sharing of sexual content.

Student: For the purpose of this policy, student refers to an individual who is enrolled at Harlaxton College.

The 5 Rs of Safeguarding: Recognise signs of abuse or neglect; respond with immediate and appropriate action; report concerns through the procedures in this policy; record information accurately; refer to statutory authorities when required.

6. Multi-Agency Safeguarding Requirements

Harlaxton collaborates with the Lincolnshire Safeguarding Children Partnership ("LSCP") and the Lincolnshire Safeguarding Adults Board ("LSAB") to support multi-agency safeguarding arrangements in accordance with Working Together 2026 and the Care Act 2014. While Harlaxton is not a statutory safeguarding partner, it is a relevant agency and will engage with the partnership and/or Board for the purpose of strategy discussions, section 47 child protection enquiries, section 42 adult safeguarding enquiries, and lawful information sharing. Harlaxton is committed to following Local Authority guidance on intervention, escalation, and multi-agency coordination. Details of the LADO as well as relevant contact details for the LSCP and LSAB can be found at the beginning of the policy.

Where relevant, Harlaxton will contribute to Early Help processes by identifying children who may benefit from support, sharing concerns with the LSCP and LSAB, and participating in Early Help assessments and multi-agency meetings when appropriate. Early Help is a voluntary process undertaken with the consent of the family and focuses on identifying strengths and needs through an Assessment and Action Plan. Harlaxton's role is to support Early Help, not to lead statutory assessments.

Harlaxton will follow the principles set out in the Data Protection Act 2018, UK General Data Protection Regulation ("**UK GDPR**") and the golden rules of information sharing contained in the Department of Education, non-statutory guidance Information Sharing: Advice for Practitioners. Safeguarding information will be shared when it is necessary, proportionate, and lawful to do so, including circumstances where information must be shared without consent to protect a child or adult at risk from harm. Harlaxton will respond to information-sharing requests from safeguarding partners in a timely manner.

7. Safeguarding Responsibilities

7.1 Harlaxton Staff

All staff understand that safeguarding is everyone's responsibility. To that end, they all have a responsibility to:

- Have read and be familiar with this policy and the Code of Conduct for staff at Appendix D;
- Be aware of the systems, policies and procedures in place at Harlaxton which support safeguarding;
- Be aware of the signs of abuse and neglect so that they are able to identify children and adults at risk who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, working with other services as needed;
- Keep the Harlaxton DSL informed on an ongoing basis of any information that might have implications for the safeguarding of children or adults at risk for individuals who are on the Harlaxton premises or associated with Harlaxton programmes.
- Make a direct referral to the LSCP or LSAB immediately if, at any point, there is a risk of immediate serious harm and the DSL and Deputy Designated Safeguarding Leads ("**DDSLs**") are unavailable; and
- Complete regular safeguarding training as required.

7.2 Designated Safeguarding Lead

Harlaxton has appointed a DSL whose role is to provide strategic leadership and oversight of safeguarding across Harlaxton. The DSL is Harlaxton's primary point of contact for all safeguarding and child protection matters, and they also have lead responsibility for safeguarding and child protection at Harlaxton.

The DSL is a senior member of staff with the authority, time, and resources to fulfil the role. The DSL is supported by a team of three DDSLs who support the DSL and will act in their absence. For the purposes of this policy, references to the DSL include the DDSLs unless otherwise specified. The DSL and DDSLs will complete all required training, including Level 3 Safeguarding Children and Designated Safeguarding Lead training, and will undertake regular refresher training.

The DSL at Harlaxton is:

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Student Experience Manager
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The DDSLs at Harlaxton are:

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The role of the DSL includes:

- overseeing the safeguarding decision tree, including determining when residential safeguarding rules apply;
- ensuring that all staff and External Groups understand their safeguarding responsibilities;
- making referrals to statutory agencies where safeguarding thresholds are met;
- working with the Harlaxton Office of Human Resources to ensure safer recruitment practices are followed and that individuals unsuitable to work with children or adults at risk are not engaged;
- acting as Harlaxton's primary point of contact with statutory safeguarding partners, including the LADO, the LSCP, LSAB and the Police;
- ensuring that the Safeguarding Policy is reviewed and updated at least annually.
- ensuring that individuals engaged by Harlaxton receive safeguarding training on induction and at least annually thereafter;
- ensuring that safeguarding training covers topics including recognising abuse, responding to disclosures, reporting procedures, maintaining a safe culture, bullying and online risks, and relevant legislation;

- ensuring staff receive Prevent Duty training appropriate to their role; and
- maintaining accurate and up-to-date records of all safeguarding-related training.

7.3 Trustee Lead

The Harlaxton Board of Trustees has appointed one member to serve as the Board-Level Safeguarding Lead (“**Trustee Lead**”).

The Trustee Lead has responsibility for:

- providing strategic oversight of safeguarding across Harlaxton on behalf of the Board of Trustees;
- supporting the Board in maintaining effective governance of safeguarding in accordance with Working Together 2026 and Charity Commission expectations;
- maintaining an appropriate level of knowledge of relevant UK safeguarding legislation and guidance;
- providing appropriate challenge and support to the DSL and DDSs to ensure safeguarding arrangements are robust, well resourced and effective;
- exercising strategic oversight of safeguarding arrangements across Day Only and Residential settings;
- holding leadership to account through scrutiny and challenge to ensure safeguarding risks are properly identified and reflected in Harlaxton’s Risk Register
- ensuring that the Board receives regular updates on safeguarding activity, incidents, training and compliance;
- assuring themselves that Harlaxton is meeting its multi-agency safeguarding responsibilities, including adherence to LSCP and LSAB procedures, information-sharing expectations and statutory referral processes;
- reviewing the effectiveness of the safeguarding assurance process for External Groups; and
- ensuring that Harlaxton's safeguarding culture is evaluated annually as part of Board-level oversight.

The Trustee Lead does not hold operational responsibility for safeguarding, but is responsible for ensuring that:

- appropriate safeguarding policies, procedures and oversight mechanisms are in place; and
- the DSL has the authority, resources and support required to fulfil their role effectively.

8. Recruitment Practices

Harlaxton is committed to safer recruitment practices for all individuals who work or volunteer at Harlaxton, including those engaged in Regulated Activity with children or adults at risk. Harlaxton will verify identity, right to work, employment history, and qualifications in accordance with UK legal requirements and safeguarding guidance. All job advertisements will include a safeguarding commitment statement and will make clear that successful applicants will be subject to appropriate background checks, including DBS and enhanced DBS checks where required.

Applicants for roles involving work with children or adults at risk must complete a detailed application form. Shortlisting will be conducted by no fewer than two individuals, both of whom have received Safer Recruitment training every four years, who will scrutinize applications for inconsistencies or unexplained gaps in employment. Candidates must provide written explanations for any gaps. Harlaxton will consider carrying out an online search on shortlisted candidates as part of its due diligence. Shortlisted candidates will be interviewed by at least two interviewers, and interviews will include questions assessing motivation

to work with vulnerable groups, understanding of professional boundaries, and ability to safeguard children and adults at risk. Where relevant, interviews will assess understanding of safeguarding in residential settings.

Harlaxton's Human Resources, or the Hiring Manager at the directive of Human Resources will verify the candidate's qualifications and conduct at least two reference checks, including from the most recent employer. References will be obtained, recorded and scrutinised before appointment wherever possible and will be verified verbally. Where a role meets the legal definition of a Regulated Activity, Harlaxton will obtain an Enhanced DBS check with the relevant Barred List check. It is a criminal offence for Harlaxton to knowingly permit an individual on the Children's or Adults' Barred List to engage in Regulated Activity.

Where engagement is offered prior to the completion of all checks, the offer will be conditional on satisfactory references and DBS clearance. Human Resources will maintain a Single Central Record of all safer recruitment checks. If an individual begins work before DBS clearance is received, Human Resources will implement a written, risk-assessed supervision plan until clearance is confirmed. If an external Contractor has not received DBS clearance prior to working at Harlaxton, they will be accompanied by a vetted member of staff with a completed risk assessment. Staff without a DBS check on file with HR may not engage in a Regulated Activity, interact with, or have unsupervised access to children or adults at risk.

All staff engaged by Harlaxton are required to comply with the Code of Conduct for Staff (Appendix C).

9. External Groups

External Groups must comply with the safeguarding requirements contained in the Programme Facilities and Services Agreement with Harlaxton, as a condition of use and occupation of the premises. These expectations include ensuring the External Group conducts appropriate vetting and checks against staff and volunteers, that they are suitably trained, that they have appropriate reporting mechanisms (including reporting to the DSL at Harlaxton where necessary), and have identified someone with particular responsibility for safeguarding (who should be identified to Harlaxton.) The failure of an External Group to adhere to these requirements will lead to the immediate termination of the Programme Facilities and Services Agreement. External Groups must confirm in writing that they understand and will comply with all safeguarding requirements as a condition of using Harlaxton's premises.

External Groups hosting children on Harlaxton premises must also receive a safeguarding briefing prior to arrival. This briefing will include:

- Harlaxton safeguarding procedures
- reporting procedures and DSL contact information
- supervision expectations and ratios
- residential safeguarding rules (if applicable)
- prohibited conduct and boundary expectations
- requirements for vetting and Regulated Activity compliance

10. Missing Child Procedure

All staff and children should be encouraged to report concerns where a child's whereabouts are unknown and there are concerns about their health, wellbeing and/ or safety. The missing child procedure may also be triggered by an unplanned absence that gives rise to concerns.

In the first instance, any concerns should be reported to the DSL, who will be responsible for coordinating the initial response.

However, if there is a concern that someone is at imminent risk of harm, emergency services should be contacted immediately at 999.

The DSL will collate key information about the missing child including:

- Where and when they were last seen
- Who they were last seen with
- Whether there are any particular concerns for their safety
- Whether family members or next of kin are aware

The DSL will work with colleagues to undertake proportionate enquiries to try to locate the child. This may include attempting to contact the child directly, checking student card entry logs and, where appropriate, speaking with the missing child's friends, roommates, peers, or staff, taking care not to disclose unnecessary information or cause undue alarm. The DSL will also contact Harlaxton's insurance providers to ensure they are kept informed of any missing children.

Where the child's location and wellbeing cannot be confirmed, the DSL will assess the level of risk and, where appropriate, report the child as missing to the Police and notify the relevant embassy.

Child-on- Child Abuse

Child-on-child abuse is abuse of one or more children against another child. It can take place on a standalone basis or as part of a wider pattern of abuse and can occur in person or online.

It can manifest itself in many ways and can include bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Harlaxton takes a zero-tolerance approach to abuse, and comments and interactions should never be passed off as "banter" and "just having a laugh", "part of growing up" or "boys being boys," as this can lead to a culture of unacceptable behaviour and an unsafe environment for children.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, the safeguarding procedures in accordance with this policy will be followed, and support from external agencies will be sought, as appropriate.

Harlaxton recognises that children staying in residential settings can be particularly vulnerable and are alert to the potential for child-on-child abuse to occur in such environments.

11. Child Welfare and Safety

11.1 Boundaries

All Harlaxton staff are in a position of trust. Under the Sexual Offences Act 2003, it is a criminal offence for an adult to engage in sexual activity with an individual under the age of 18 where the adult is in a position of trust. This applies even where the individual is aged 16 or 17 and is otherwise legally able to consent to sexual activity. To ensure that all children are able to study in a safe, respectful, and supportive environment, Harlaxton prohibits any close or intimate relationship between Harlaxton staff members and students or children.

11.2 Mental Health

Harlaxton is committed to providing a safe and supportive environment in which child wellbeing is of the utmost importance. Staff must remain alert to signs of emotional distress, anxiety, self-neglect, or mental health concerns. Concerns must be reported to the DSL, who will determine whether safeguarding, medical, or pastoral interventions are required. Staff must not attempt to diagnose or provide clinical mental health treatment but may offer supportive listening and ensure the individual is connected to appropriate services.

11.3 Security

Harlaxton operates a staffed reception and provides security services during the day, evenings and overnight, with security cover at weekends. Security Officers liaise closely with the Student Engagement Office to support student welfare.

12. Residential Safeguarding

12.1 Emergency Procedures

Staff must know how to respond to medical emergencies, missing children and behavioural incidents. All emergencies must be reported to the DSL and documented in accordance with Harlaxton's procedures.

12.2 Expected Level of Staff Conduct

Staff must maintain professional boundaries at all times. Staff must not sleep in room assigned to children, socialise privately with children, or engage in behaviour that could be misinterpreted as overly familiar. Staff must not drink or be under the influence of alcohol and must be fully capable of supervising children during residential duties. Staff must adhere to call conduct expectations in the Code of Conduct for Staff (Appendix C).

12.3 Reporting Concerns

Any safeguarding concern arising in a residential setting must be reported immediately to the DSL. Concerns may include disclosures, missing children, behavioural changes, boundary violations, nighttime safety concerns, or any situation that places a child at risk. Staff must not investigate concerns themselves and must follow Harlaxton's reporting procedure which is to inform the DSL as soon as possible.

13. Meet a Family Programme

As part of its educational and cultural offering, Harlaxton offers students the opportunity to take part in the Meet a Family programme, which enables them to spend time with local families within the community. Harlaxton does not arrange or supervise such visits and does not assume parental responsibility for students during these interactions.

Local families welcoming students into their homes remain solely responsible for the safety, welfare and supervision of their own children at all times. Harlaxton does not oversee, approve or monitor private arrangements between students and local families and does not undertake safeguarding and background vetting checks in respect of these arrangements.

Students are expected to conduct themselves responsibly and appropriately at all times when visiting local families and must comply with Harlaxton's Code of Conduct for Children and Students (Appendix D) and behavioural expectations as set out in the pre briefing for the programme. Students must not place themselves or others at risk and are expected to respect household boundaries and safeguarding expectations.

14. Reporting

If a child, student or adult at risk is in imminent danger, emergency services must be contacted immediately at 999.

When a child, student or adult at risk makes a disclosure of abuse, neglect or harm, the individual receiving the disclosure must:

1. Listen to the disclosure calmly and empathetically without interrupting (focusing on fact and listening in a neutral/non-judgmental manner)
2. Avoid promising confidentiality and explain that information must be shared to keep them safe.
3. Avoid leading questions and use trauma-informed, open prompts.
4. Reassure the individual that their disclosure will be taken seriously and that they will be supported and kept safe

14.1 Safeguarding Concerns

Where a staff member has a safeguarding concern or receives a disclosure about the safety or welfare of a child, student or adult at risk, they must immediately notify the DSL or DDSL and complete a Safeguarding Concern Reporting Form (Appendix A). Where the concern or disclosure involves a residential setting, the DSL will assess whether the environment poses an ongoing risk during nighttime hours and will implement immediate protective measures.

The DSL must make a referral to the LSCP or LSAB immediately if the concern relates to a child or an adult at risk and within one working day where there is reasonable cause to suspect that a child or an adult at risk has suffered or is likely to suffer harm. Anyone can make a referral if the DSL is not available. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. In borderline cases, the DSL should discuss the safeguarding concern with the LSCP or LSAB. Following the discussion, the DSL should be guided by the advice of the LSCP or LSAB when deciding whether a referral should be made.

The DSL may seek clarification from the child or adult at risk to understand the concern but must not conduct any internal investigation without prior consultation with the LSCP or LSAB, or where necessary, the Police, so as not to jeopardise statutory investigations. All actions and decisions must be recorded and stored securely.

14.2 Allegations against Staff

Any allegation that a member of Harlaxton staff has abused, harmed, or exploited a child, student, or adult at risk must be reported without delay to the Designated Safeguarding Lead (DSL) and the Executive Director and Dean at Harlaxton (hereafter referred to as “the Dean”).

Where the allegation concerns the Dean, the matter must instead be reported without delay to the DSL, the Trustee Lead, and the President of the University of Evansville.

If there is a threat of imminent danger to a child, student or adult at risk, emergency services must be contacted at 999.

Allegations arising in residential settings will be treated as high-risk due to increased vulnerability during overnight accommodation.

Upon receiving an allegation against a staff member, the Dean will ensure that the individual is immediately separated from the child, student or adult at risk .

The Dean must refer the allegation to the LADO and the DSL must make a referral to the LSCP or LSAB immediately for emergent situations and within one working day in all other cases where:

- An adult has behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk;
- An adult has possibly committed a criminal offence against or related to a child or adult at risk;
- An adult has behaved in a way towards a child/children/ adult(s) at risk that indicates they may pose a risk of harm if they were to work regularly or closely with children or adults at risk; or
- An adult has behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk.

The Dean must conduct basic enquiries in line with local procedures to help establish the facts and determine whether there is any foundation to the allegation. However, no formal internal investigation should be conducted without prior consultation with the LADO, or where necessary, the Police, so as not to jeopardise statutory investigations. When to inform the individual who is subject to the allegation will be considered on a case by case basis, with guidance from the LADO, and if appropriate, the Police and the LSCP or LSAB. Subject to this point, the Executive Director will inform the individual as soon as possible of the allegations against them and offer an opportunity for them to respond verbally or in writing.

If the Dean determines that the individual cannot safely remain in their role whilst investigations are ongoing, they will work with HR to implement interim measures, which may include role reassignment, restricted duties, or removal from a Regulated Activity. Suspension should not be an automatic response when an allegation is reported but should be considered in cases where there is cause to suspect that a child, student or adult at risk would be at risk of harm, or if the case is so serious that it might be grounds for dismissal. Supportive measures will be offered to both the child, student or adult at risk and the staff member. All actions, decisions, and communications must be documented.

If an individual's employment is terminated, they resign, they are removed from a Regulated Activity, or Harlaxton ceases to use their services because they have harmed a child or adult at risk or may pose a risk of harm, the Dean must make a referral to the DBS. The referral must include:

- Full name, date of birth, and contact details
- Job title and description of duties
- Confirmation that the role involved a Regulated Activity
- A detailed chronology of concerns and evidence
- Assessment of risk to vulnerable populations

14.3 Notification Requirements

The reporting duties of the DSL include reporting any safeguarding concerns or incidents that meet the UK statutory reporting thresholds, and any involvement with statutory agencies (such as the LSCP or LSAB, medical services or the Police), to the Associate Director of Institutional Equity and Title IX Coordinator at the University of Evansville.

Where appropriate, according to the particular facts and circumstances of a safeguarding concern or allegation raised, the DSL will also consider whether to make a serious incident report to the Charity Commission in accordance with its guidance.

When Harlaxton receives an allegation or concern related to an External Group using its premises, it will follow its own safeguarding policies and procedures. Harlaxton will make referrals to the relevant statutory agencies, where statutory thresholds are met, irrespective of the External Group's internal processes or whether the External Group has already made a referral. External Groups must cooperate fully with all safeguarding enquiries made by Harlaxton and cannot delay or prevent Harlaxton from making statutory referrals.

14.4 Low-Level Concerns

A Low-Level concern is any concern or "nagging doubt" that a staff member may have acted in a way that:

1. Is inconsistent with Harlaxton's Code of Conduct for Staff and expectations around appropriate boundaries, including inappropriate conduct outside of work; and
2. Does not meet the harm threshold, or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly
- Having favourites
- Engaging with children, or adults at risk on a one to one basis in a secluded area or behind a closed door

Harlaxton encourages staff to self-refer if they find themselves in a situation that could be misinterpreted, which might appear compromising to others, and/or on reflection where they believe they might have behaved in a way considered to fall below the professional standards expected of them. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Harlaxton takes all concerns about safeguarding seriously and staff must not assume that a concern is too minor to report. Harlaxton recognises that addressing Low-Level Concerns creates a culture of openness, where accepted behaviour is modelled, monitored and reinforced by all staff.

All Low-Level concerns must be reported immediately to the DSL using the designated reporting form which can be found at Appendix E. Where a Low-Level concern is raised about the DSL, this should be reported to the Trustee Lead instead. The DSL will record all Low-Level concerns in Harlaxton's Low-Level Concerns Log and will monitor the log for emerging patterns, repeated behaviours, or escalating risk.

The DSL will review each concern to determine whether it remains low-level, requires additional monitoring, or meets the threshold for escalation to the LADO, Police, LSCP or LSAB. Where patterns of behaviour are identified, the DSL will take appropriate action to address the concern, which may include supervision adjustments, reflective conversations, training, or formal disciplinary processes.

Where a Low-Level Concern involves an individual engaged by an External Group, the DSL will notify the individual's employer.

All Low-Level Concerns will be stored securely in accordance with Harlaxton's Records Retention Policy and will be reviewed as part of ongoing safeguarding oversight.

Harlaxton will not include Low-Level Concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

15. Procedure Regarding Adults at Risk

Staff must recognise that safeguarding adults at risk differs from safeguarding children; adults have the right to make their own decisions, and intervention must be the least restrictive option that still protects the individual from harm.

They must remain alert to all forms of abuse affecting adults at risk, including:

- physical, emotional, sexual, or financial abuse;
- neglect or acts of omission;
- domestic abuse;
- discriminatory abuse;
- organisational abuse; or
- self neglect, including hoarding or failure to meet basic needs.

If a safeguarding concern, disclosure or allegation relates to an adult at risk, when assessing whether to make a referral to an external agency, the DSL must consider the views of the adult in all circumstances where it is possible and safe to seek their views. If an adult at risk refuses intervention to support them with a safeguarding concern, disclosure or allegation, this should be respected. There are some exceptions where the wishes of the adult may be overridden and a referral made, including (but not limited to) where the adult does not have capacity to make the decision, where other people are or may be at risk of harm, where an individual associated with Harlaxton is the subject of an allegation, or where a serious crime has been committed.

In working with adults at risk, the DSL/ DDSLs must

- Presume capacity unless there is clear evidence to the contrary;
- Assess capacity for specific decisions using the Mental Capacity Act 2005 framework;
- Support individuals to make their own decisions wherever possible, offering information in accessible formats and allowing time for processing;
- Involve advocates, family members, or friends where appropriate and with consent, unless doing so increases risk;
- Respect the individual's wishes and preferences, focusing on what "safe" means to them, not solely on procedural compliance;
- Build rapport and trust, recognising that adults may have experienced trauma, coercion, or previous negative interactions with services;
- Approach conversations with sensitivity, patience, and respect for autonomy;
- Use communication methods that meet the individual's needs, including simplified language, visual aids, or interpreters where required; and
- Prioritise dignity, privacy, and emotional safety in all interactions.

The DSL/DDSLs must ensure that responses to safeguarding concerns, disclosures or allegations involving adults at risk are:

- proportionate to the level of risk;
- the least intrusive option;
- the least restrictive on the individual's rights and freedoms; and
- focused on enabling independence and wellbeing.

16. Information Sharing and Confidentiality

Safeguarding requires timely, lawful, and proportionate information sharing. Harlaxton is committed to protecting the privacy of children, students, and adults at risk while ensuring that information is shared appropriately to prevent harm. All information sharing must comply with the Data Protection Act 2018, UK GDPR, Working Together 2026, and the Care Act 2014.

16.1 Consent and information sharing

Where appropriate and safe, Harlaxton will seek consent before sharing information. However, Harlaxton may share safeguarding information without consent where:

- a child or adult at risk is at risk, or there is a perceived risk of harm;
- there is reasonable cause to suspect that an adult has care needs and support, is experiencing or is at risk of abuse or neglect, and is unable to protect themselves because of those need;
- a crime may have been committed;
- information is required by statutory agencies such as the Police, LSCP or LSAB; or
- sharing is necessary to protect others from harm.

16.2 Principles of Information Sharing

All staff must follow the Seven Golden Rules of Information Sharing in the Department for Education non-statutory guidance Information Sharing: Advice for Practitioners by:

- prioritising protecting a child and adult at risk from harm over privacy and data protection concerns;
- if safe and practicable to do so, engaging with the child or adult at risk and their carer about who you intend to share information with and what you will be sharing;
- not requiring consent to share information if a child or adult at risk is at risk of harm;
- seeking advice if you are unsure how the legal framework supports information sharing in a particular case;
- taking steps to protect the identities of individuals who could be put at risk if their information were disclosed inappropriately;
- sharing information that is relevant, accurate and proportionate only to those who need it to safeguard the child or adult at risk; and
- recording what information was shared, with whom, for what purpose, and the reason for doing so.

The DSL will respond promptly to information-sharing requests and will ensure that all disclosures are lawful and documented.

Staff must not discuss safeguarding concerns or allegations with colleagues, students, children or External Groups except on a need-to-know basis as directed by the DSL.

17. Record Keeping

Accurate, timely, and secure record keeping is essential to effective safeguarding. Harlaxton will maintain comprehensive safeguarding records in accordance with the Data Protection Act 2018, UK GDPR, Working Together 2026 and its Records Retention Policy. All safeguarding records must be factual, objective, and stored securely.

17.1 Purpose of Safeguarding Records

Safeguarding records are maintained to:

- document disclosures, concerns, allegations, and incidents;
- support decision-making and risk assessments;
- identify patterns of behaviour or escalating risk;
- provide evidence for statutory referrals and multi-agency processes;
- ensure continuity of support for children, young people, and adults at risk; and
- demonstrate compliance with legal and regulatory requirements.

17.2 Types of Records Maintained

The DSL will maintain the following safeguarding records:

- disclosures made by children, adults at risk, or third parties;
- incident reports and safeguarding concern forms;
- LADO referrals and correspondence;
- social care referrals and responses;
- Police reports or crime reference numbers;
- internal risk assessments and protective measures;
- Low-Level Concerns Log;
- chronology of significant events for each child or adult at risk;
- records of meetings, decisions, and actions taken;
- DBS referral documentation;
- residential incident logs (room breaches, missing children, nighttime concerns); and
- External Group safeguarding communications.

17.3 Standards for Recording

All safeguarding records must be:

- accurate — reflecting facts, not assumptions
- timely — written as soon as possible after the event
- objective — avoiding personal opinions or speculation
- complete — including dates, times, names, and actions taken
- verbatim where possible — especially for disclosures
- signed and dated by the individual making the report

Records must clearly distinguish between:

- what the child or adult at risk said;
- what the staff member observed;
- actions taken by staff; and
- decisions made by the DSL.

17.4 Secure Storage, Access and Retention

Safeguarding records must be stored in a secure, access-restricted digital system separate from general personnel or student files. Access is limited to:

- the DSL
- the DDSLs
- designated safeguarding personnel approved by the DSL

Records must not be stored on personal devices, email accounts, or unsecured systems. Paper records, where used, must be scanned and uploaded securely, then stored in locked cabinets.

Safeguarding records will be retained in accordance with statutory guidance and best practice. Child protection records will be kept until a child's 25th birthday. Records of allegations against staff will be retained for 10 years, or until the employee is 65. Safeguarding records involving volunteers will be retained for 10 years after last contact. Records relating to allegations of child sexual abuse will be retained until the child reaches the age of 75. Records must be retained for the appropriate period to support potential future enquiries, including LADO investigations, DBS referrals, or legal proceedings. Disposal must be secure and documented.

17.5 Information Sharing and Transfer

Where safeguarding records must be shared with statutory agencies, the DSL will ensure that:

- information is necessary, proportionate, and lawful;
- only relevant information is shared;
- records are transferred securely; and
- a record is kept of what was shared, with whom, and why.

When External Groups are involved, the DSL will document all communications, concerns, and actions taken.

17.6 Monitoring and Oversight

The DSL will regularly review safeguarding records to:

- identify patterns of concern;
- ensure timely follow-up;
- monitor the effectiveness of safeguarding responses; and
- support annual safeguarding audits and policy reviews.

18. Risk Assessment Procedures

Harlaxton is committed to ensuring that all activities, programmes, and residential operations involving children, young people, and adults at risk are supported by robust, dynamic, and legally compliant risk assessments. Risk assessments must identify hazards, evaluate risks, implement control measures, and ensure that safeguarding considerations are embedded into all aspects of Harlaxton operations.

18.1 Purpose of Safeguarding Risk Assessments

Safeguarding risk assessments are required to:

- identify potential risks to children, young people, and adults at risk
- ensure appropriate supervision, staffing, and environmental controls
- prevent abuse, neglect, exploitation, and unsafe practices
- support safe delivery of Day-Only and Residential Settings
- ensure compliance with statutory guidance and insurance requirements
- document decision-making and protective measures

Harlaxton will maintain and regularly update the following categories of risk assessments:

- Activity-specific risk assessments — for academic sessions, excursions, physical activities, workshops and events.
- Residential Setting risk assessments — covering rooming, and nighttime supervision.
- Risk assessments for children under 18 – addressing situations where students participate in a Harlaxton programme before they reach their 18th birthday.
- External Group risk assessments — where External Groups are using Harlaxton's facilities or premises.
- Individual risk assessments — for children or adults at risk with medical needs, behavioural concerns, disabilities, or safeguarding vulnerabilities.
- Environmental risk assessments — for campus facilities, grounds, and high-risk areas.
- Transport and travel risk assessments — for off-site trips, transfers, and excursions.
- Staffing and supervision risk assessments — ensuring appropriate ratios, supervision, and Regulated Activity compliance.

All risk assessments must be:

- completed in advance of the activity or residential stay by the External Group;
- reviewed by the DSL when children or adults at risk are involved;
- proportionate to the level of risk;
- dynamic, allowing for adjustments as conditions change;
- documented, signed, and stored securely; and
- communicated to all relevant staff and External Group leaders (where applicable).

Risk assessments must consider:

- age, maturity, and needs of participants;
- staffing ratios and vetting requirements;
- environmental hazards and accessibility;
- supervision requirements, including nighttime supervision;
- emergency procedures and communication plans;
- safeguarding vulnerabilities, including mixed-age interactions; and
- Prevent Duty considerations where relevant.

Residential Settings require enhanced risk controls which are dependent on the ages of the students participating in the programme, including:

- gender-appropriate and age-appropriate rooming assignments;
- fire safety compliance and evacuation planning;
- protocols for missing children and room breaches;
- staff training in nighttime safeguarding; and
- restrictions on access to staff areas and private spaces.

The DSL will maintain a Residential Safeguarding Decision Tree to guide staff and External Groups on when residential safeguarding rules apply.

18.2 External Group Risk Assessments

External Groups that include children under 18 must submit their own safeguarding and activity risk assessments prior to arrival. The DSL will review these assessments to ensure they meet Harlaxton standards. External Groups must implement all required control measures and may not reduce supervision levels or modify risk controls without Harlaxton approval.

Where External Groups fail to provide adequate risk assessments, Harlaxton may refuse access to facilities or require additional supervision or controls.

18.3 Individual Risk Assessments

The DSL will complete individual risk assessments for children or adults at risk who:

- have medical or mental health needs;
- have behavioural concerns or a history of harmful behaviour;
- are subject to court orders or custody restrictions;
- present a risk to others or are at heightened risk themselves; and
- require additional support during residential stays.

These assessments will inform staffing, supervision, rooming, and protective measures.

18.4 Monitoring and Review

Risk assessments must be reviewed:

- before each programme or activity;
- after any incident or near-miss;
- when a participant's needs change;
- when environmental conditions change; and
- at least annually as part of Harlaxton's safeguarding review.

The DSL will review with Trustees safeguarding-related risk assessments as part of their ongoing governance oversight.

18.5 Record Keeping

All risk assessments must be stored securely in accordance with Harlaxton's Records Retention Policy. The DSL will maintain a Risk Register documenting key safeguarding risks, control measures, and monitoring actions.

19. Health, Safety, Fire and Medical Protocols

Harlaxton is committed to providing a safe and healthy environment for all children, students and adults at risk participating in Harlaxton activities. Health, safety, and medical procedures are integral to safeguarding and apply to all day-only and residential activities. Please refer to Appendix F for these protocols.

20. Safeguarding Training and Implementation

Harlaxton is committed to ensuring that all staff understand their safeguarding responsibilities and are equipped to implement this policy effectively. Safeguarding training is mandatory, role-specific, and continuous. Implementation of this policy is overseen by the DSL, with governance oversight from the Trustees.

20.1 Mandatory Training Requirements

All staff must complete safeguarding training appropriate to their role. Training will be delivered upon hire and refreshed at least annually. Required training includes:

- Safeguarding Children and Adults at Risk — recognising abuse, responding to disclosures, reporting procedures, and understanding professional boundaries.
- Prevent Duty Training — identifying and responding to risks of radicalisation, tailored to the employee's role.
- Residential Safeguarding Training — for those working in overnight settings, including room-check procedures, nighttime supervision, and emergency response.
- Low-Level Concerns and Professional Conduct — understanding boundary-related concerns, reporting expectations, and Harlaxton's Code of Conduct.
- Mental Capacity Act and Care Act Training — for staff engaging in Regulated Activity with adults at risk.
- Online Safety and Digital Conduct — understanding risks related to digital communication, cyberbullying, and harmful online content.

The Trustees will ensure that all Trustees receive appropriate safeguarding and child protection training at induction. This training should be updated annually.

Training content will be updated regularly to reflect changes in legislation, statutory guidance, and sector best practice.

20.2 Role-Specific Training

Certain roles require enhanced or specialist training:

- DSL and DDSL — Level 3 Safeguarding Children, Designated Safeguarding Lead training, Prevent Duty advanced training, safer recruitment, and ongoing professional development.
- Residential Supervisors — nighttime safeguarding, missing child protocols, fire safety, and emergency room-entry procedures.
- Human Resources Staff — safer recruitment, DBS eligibility, and handling allegations against staff.
- Staff in Regulated Activity — training on the Sexual Offences Act 2003, positions of trust, and working with adults at risk

20.3 Implementation of the Policy

The DSL is responsible for ensuring that this policy is implemented consistently across all Harlaxton operations. Implementation includes:

- communicating safeguarding expectations to all staff and External Groups;
- ensuring risk assessments incorporate safeguarding considerations;
- monitoring compliance with residential safeguarding procedures;
- reviewing incident reports, Low-Level Concerns, and patterns of behaviour;
- coordinating with the Health and Safety Officer on emergency procedures;
- ensuring that External Groups receive safeguarding briefings prior to arrival; and
- maintaining the Safeguarding Decision Tree for residential programmes

The DSL will work with the Dean, Human Resources, and Programme Leads to ensure that safeguarding responsibilities are embedded into daily practice.

20.4 Monitoring and Quality Assurance

The DSL will monitor training completion and implementation through:

- annual training audits;
- review of incident reports and safeguarding logs;
- supervision sessions with staff in high-risk roles;
- evaluation of residential programme operations;
- feedback from staff, students, and External Groups; and
- review of risk assessments and protective measures.

The Trustees will receive anonymised safeguarding data to support governance oversight and ensure accountability. This information, as well as any additional information, will be reviewed in Executive Session of biannual Trustee meetings.

20.5 Record Keeping

Human Resources and the DSL will maintain accurate records of all safeguarding training, including:

- dates of completion;
- type and level of training;
- staff roles and responsibilities;
- refresher training schedules; and
- External Group training confirmations.

Training records will be stored securely and retained in accordance with Harlaxton's Records Retention Policy.

21. Policy Governance and Review

This policy is governed through a clear structure of leadership, oversight, and accountability to ensure that safeguarding remains a central, continuously improving function at Harlaxton. Governance responsibilities extend across operational leadership, strategic oversight, and Board-level assurance, with defined review cycles and escalation routes.

21.1 Governance Structure

Safeguarding governance is shared across several key roles. The DSL provides operational leadership, ensuring day-to-day implementation, staff compliance, and coordination with statutory agencies. The Dean supports institutional enforcement of safeguarding expectations and ensure that safeguarding considerations are embedded into academic, residential, and operational planning. The Trustee Lead provides strategic oversight, ensuring that the Board maintains effective governance of safeguarding and receives regular updates, at least bi-yearly, on safeguarding activity, risks, and compliance. The Board of Trustees holds ultimate accountability for ensuring that safeguarding arrangements are robust, well-resourced, and compliant with statutory requirements. Human Resources ensures safer recruitment, training compliance, and appropriate handling of allegations involving staff.

21.2 Policy Review Cycle

This policy will be reviewed at least annually by the DSL, in consultation with the Dean, t, Human Resources, and the Trustee Lead. Reviews will consider changes in legislation, statutory guidance, sector best practice, and lessons learned from incidents, audits, or multi-agency feedback. Interim updates may be made sooner if required by changes in law, regulatory expectations, or operational needs. All revisions will be approved by the Board of Trustees.

21.3 Continuous Improvement

Safeguarding practice will be strengthened through ongoing monitoring, training audits, review of incident logs, and evaluation of residential operations. The DSL will identify areas for improvement and implement corrective actions, including updates to procedures, training content, or supervision models. Feedback from staff, students, External Groups, and statutory partners will inform continuous improvement efforts. Harlaxton will participate in multi-agency safeguarding initiatives and incorporate learning from national reviews, local safeguarding partnerships, and sector guidance.

21.4 Communication of Policy Updates

Any changes to this policy will be communicated promptly to staff. Updated versions will be published in accessible formats and key points will be incorporated into training, onboarding materials, and where necessary, Programme Facilities and Services Agreements. Staff will be required to acknowledge receipt of updated policies, and External Groups will be required to confirm compliance with various safeguarding obligations as a condition of use.

Policy Origination Date: June 2026

Last Review Date: 26 June 2026

Next Review Date: 1 June 2027

Appendix A

Safeguarding Concern Reporting Form

CONFIDENTIAL

Online Form: https://cm.maxient.com/reportingform.php?UnivofEvansville&layout_id=12

Person completing the form

Name:

Role:

Contact details:

Date and time completed:

Person(s) of concern

Name(s):

Age (if under 18):

Relationship to College (e.g. student/visitor etc.):

Nature of concern

☐ Physical abuse	☐ Self-harm / suicide risk
☐ Emotional abuse	☐ Exploitation
☐ Sexual abuse	☐ Radicalisation
☐ Neglect	☐ Online safety
☐ Bullying / harassment	☐ Other:

Details of concern (Factual account only)

Immediate risk identified?

☐ Yes ☐ No Action taken:

Witnesses (if any)

Names:

Relationship to College:

Reported to DSL

Date

Time:

Name of Reporter:

Signature

Appendix B

Summary of Reporting Routes

Emergencies and Immediate Danger

If a child, student, or adult at risk is in **immediate danger**, staff must contact **999** without delay. Once emergency services have been contacted, the DSL must be notified as soon as it is safe to do so.

Safeguarding Concerns, Disclosures, or Observations

Any concern—no matter how small—must be reported **immediately** to the DSL. This includes:

- disclosures of abuse or neglect
- observations of concerning behaviour
- signs of harm
- unsafe or boundary-crossing conduct
- concerns arising during residential hours

Staff must complete Harlaxton's Safeguarding Reporting Form at Appendix A and provide a factual, verbatim account of what was said or observed.

Low-Level Concerns

Low-level concerns are concerns that are:

1. inconsistent with Harlaxton's Code of Conduct and expectations around appropriate boundaries, including inappropriate conduct outside of work; and
2. Do not meet the harm threshold, or are otherwise not serious enough to consider a referral to the LADO

These should be reported to the DSL using the Low-Level Concerns Form. The DSL will:

- record the concern in the Low-Level Concerns Log
- monitor for patterns or repeated behaviours
- notify external organisations when concerns involve External Group staff

Low-Level Concerns must never be dismissed or handled informally.

Allegations Against Staff

Any allegation that a staff member or External-Group leader has:

- harmed or may have harmed a child, student or adult at risk;
- possibly committed a criminal offence against or related to a child, student or adult at risk;
- behaved in a way that indicates they may pose a risk of harm if working with children, students or adults at risk; or
- behaved in a way that indicates they may not be suitable to work with children, students or adults at risk.

must be reported **directly to the Dean**

If the allegation involves the Dean, the DSL must notify the Trustee Lead and President of the University of Evansville.

Staff must not investigate or question the child, adult at risk or alleged perpetrator.

LADO and Statutory Referrals

The DSL must refer all allegations meeting LADO thresholds **immediately for emergent situations and within one working day for all other situations**. The DSL will also make referrals to:

- the Lincolnshire Safeguarding Children Partnerships and the Lincolnshire Safeguarding Adults Board
- the Police

Statutory referrals cannot be delayed by internal processes or External Group procedures.

External Group Reporting

External Groups must report all safeguarding concerns, disclosures, or incidents to the DSL immediately.

External Groups cannot:

- delay reporting
- prevent Harlaxton from making statutory referrals

The DSL will notify the External Group's safeguarding lead when appropriate.

Residential Safeguarding Concerns

Concerns arising in residential settings must be reported immediately to the DSL or the designated residential supervisor. These include:

- room breaches
- missing children
- nighttime safety concerns
- boundary violations
- any disclosure made during residential hours

Residential concerns are treated as high-risk due to increased vulnerability in overnight settings.

Medical, Mental Health, or Welfare Concerns

Medical emergencies must be reported to **999** when necessary and to the DSL and residential supervisors.

Mental health concerns—including signs of distress, self-neglect, or emotional crisis—must be reported to the DSL and the Wellbeing Coordinator for assessment and support planning.

Anonymous or Third-Party Reports

Harlaxton accepts anonymous reports and third-party disclosures. These must be forwarded to the DSL for assessment and action. Staff must not dismiss concerns due to incomplete information.

Documentation and Follow-Up

All reports must be documented using Harlaxton's safeguarding reporting systems. The DSL will:

- maintain secure records
- track follow-up actions
- ensure concerns are addressed in accordance with statutory guidance
- escalate concerns where thresholds are met

Appendix C

Code of Conduct for Staff

All staff are expected to uphold the highest standards of professional conduct to ensure the safety and wellbeing of children. This Code of Conduct applies to all staff and includes those who may have only incidental or occasional contact with children.

Respecting others

Staff must use appropriate language at all times (avoiding any language that could be offensive, suggestive, or otherwise inappropriate and respect the rights and feelings of others). Staff should challenge the use of inappropriate language, unlawful or poor behaviour from fellow staff members, and demonstrate a supportive and constructive attitude, maintaining the highest standards of professionalism at all times. These standards should be applied regardless of an individual's gender, race, ethnicity, religion or beliefs, disability, sexual orientation, marital status or age.

Professional Boundaries

Staff must maintain clear professional boundaries at all times. This includes avoiding behaviour that could be misinterpreted as overly familiar, personal, or inappropriate. Staff must not form inappropriate private relationships with children, communicate with them through personal devices or social media, or engage in one-to-one unsupervised contact unless explicitly risk-assessed and approved by the DSL.

Appropriate Physical Contact

Physical contact with children must be limited, appropriate, and necessary for safety or instructional purposes. Staff must avoid initiating physical contact and must never use physical punishment, restraint (except in emergencies to prevent harm), or any behaviour that could be perceived as sexualised or intrusive.

Position of Trust

All Harlaxton staff are in a position of trust. Under the Sexual Offences Act 2003, it is a criminal offence for an adult to engage in sexual activity with an individual under the age of 18 where the adult is in a position of trust. This applies even where the individual is aged 16 or 17 and is otherwise legally able to consent to sexual activity. To ensure that all children are able to study in a safe, respectful, and supportive environment, Harlaxton prohibits any close or intimate relationship between Harlaxton staff members and students. Staff must not engage in sexualised conversations, jokes or behaviour with children.

Online and Digital Conduct

Staff must use digital devices and communication platforms responsibly. They must not:

- communicate privately with children through personal accounts
- share or view inappropriate or harmful content
- record or photograph children without explicit authorisation
- use digital platforms to bully, harass, or intimidate

All digital communication with children must occur through approved Harlaxton channels.

Supervision and Duty of Care

Staff must provide appropriate supervision of children at all times, including during transitions, activities, and residential periods. Staff must follow supervision ratios: under 2 years - one adult to three children, 2

- 3 years - one adult to four children, 4 - 8 years - one adult to six children, 9 - 12 years - one adult to eight children, and 13 - 18 years - one adult to ten children; maintain line-of-sight supervision where required; and ensure that children and adults at risk are never left unattended in high-risk areas such as residential corridors, stairwells, or outdoor spaces after dark.

Residential Conduct

Staff working in residential settings must follow all overnight safeguarding procedures, including:

- adhering to the two-adult rule for emergency room entry
- never entering a child's bedroom except for safety reasons and in accordance with Harlaxton protocols
- reporting any room breaches, missing children, or safety concerns immediately

Staff must not sleep in children rooms or invite children into staff bedrooms or private staff areas.

Prohibition on Harmful Behaviour

Staff must not engage in any behaviour that could cause physical or emotional harm, including:

- bullying, humiliation, or degrading treatment
- coercive control or manipulation
- discriminatory or abusive language
- unsafe physical interventions
- encouraging risky or dangerous behaviour

Substance Use

Staff must not consume alcohol, or be under the influence of alcohol or drugs, while supervising children. Outside of the hours that children and Staff may buy and consume alcohol in the Bistro, Staff must not provide alcohol, tobacco, vapes, or any prohibited substances to children.

Reporting Safeguarding Concerns

Staff must report any safeguarding concern, disclosure, allegation, or incident immediately to the DSL. They must not investigate themselves, question the individual beyond initial listening, or discuss the concern with others except on a need-to-know basis. Failure to report a safeguarding concern may result in disciplinary action.

Confidentiality and Information Sharing

Safeguarding information must be handled confidentially and shared only with the DSL or statutory agencies. Staff must comply with the Data Protection Act 2018, the UK GDPR and Working Together 2026, including circumstances where information must be shared without consent to protect a child or adult at risk.

Compliance with Policies and Training

Staff must comply with all Harlaxton safeguarding policies, residential procedures, health and safety rules, and conduct expectations. Staff must complete safeguarding and Prevent Duty training upon hire and annually thereafter. Staff must participate in additional training when required by the DSL.

Consequences for Breaches

Breaches of this Code of Conduct may result in disciplinary action, removal from duties, suspension, termination of employment, and referral to the LADO, Police, or DBS where thresholds are met.

Appendix D

Code of Conduct for Children

Children participating in programmes at Harlaxton are expected to uphold a safe, respectful, and inclusive environment for all members of the community. These expectations apply to children in both Day-Only and Residential Settings.

Respectful Behaviour

Children must treat all individuals with dignity and respect. Bullying, harassment, discrimination, intimidation, or any behaviour that causes physical or emotional harm is prohibited. This includes in-person conduct and online behaviour such as cyberbullying, harassment, or the sharing of harmful content.

Boundaries and Personal Space

Children must respect personal boundaries and physical space. Any form of unwanted physical contact, coercion, or behaviour that makes another person feel unsafe is prohibited.

Prohibition of Sexual Activity

All Harlaxton staff are in a position of trust. Under the Sexual Offences Act 2003, it is a criminal offence for an adult to engage in sexual activity with an individual under the age of 18 where the adult is in a position of trust. This applies even where the individual is aged 16 or 17 and is otherwise legally able to consent to sexual activity. To ensure that all children are able to study in a safe, respectful, and supportive environment, Harlaxton prohibits any close or intimate relationship between Harlaxton staff members and students.

Online and Digital Conduct

Children must use digital devices responsibly and in accordance with Harlaxton rules. The following behaviours are prohibited:

- sharing or viewing sexual, violent, or otherwise harmful content
- engaging in grooming, coercive control, or online exploitation
- using digital platforms to bully, harass, or intimidate others
- recording or photographing others without consent

Substance Use

Children must not possess, use, or distribute tobacco, vapes, or prohibited substances. Students over the age of 18 are only permitted to consume alcohol in designated areas on the Harlaxton site, on designated evenings, or where legally allowable off Harlaxton premises. For those over 18, smoking and vaping is only permitted in designated areas. Students over the age of 18 must not provide alcohol, tobacco, or any prohibited substance to children under the age of 18 under any circumstances.

Site Access

Children must not enter staff bedrooms or private staff areas.

Prohibition on Harmful or Dangerous Behaviour

Children must not engage in behaviour that places themselves or others at risk of harm, including physical aggression, dangerous pranks, initiation/hazing activities, or misuse of facilities or equipment. Children should not tamper with equipment on site, such as fire safety equipment.

Reporting Concerns

Children are expected to report any concerns about their own safety or the safety of others to a staff member, chaperone, or the DSL. Children will not be penalised for making a report in good faith.

Compliance with Staff Instructions

Children must follow the instructions of Harlaxton staff and External Group Leaders. Failure to comply with safety instructions may result in removal from activities or, in serious cases, removal from the programme.

Children under 18

Children under the age of 18 participating in residential programmes must follow all residential safeguarding rules, including:

- not leaving residential areas without permissions
- adhering to curfews and room-check procedures
- remaining in assigned rooms during quiet hours unless permitted by staff
- complying with gender-appropriate and age-appropriate rooming arrangements
- following fire safety and emergency procedures
- reporting any safety concerns immediately to staff
- not entering private areas such as bedrooms or bathrooms assigned to other individuals unless explicitly permitted by residential supervisors in accordance with the supervision rules.

Consequences for Misconduct

Violations of these expectations will be addressed in accordance with Harlaxton's safeguarding procedures. Consequences may include:

- verbal warnings
- loss of privileges
- removal from activities
- contacting parents or guardians, for children under 18
- removal from the programme
- referral to statutory agencies where behaviour meets thresholds for harm, exploitation, or criminal conduct

APPENDIX E

Low Level Reporting Form

Low Level Reporting Form https://cm.maxient.com/reportingform.php?UnivofEvansville&layout_id=13

Please only use this form to report genuine concerns about an adult's conduct. This includes concerns, however small, that someone may have:

- acted inconsistently with Harlaxton's Code of Conduct; and/or
- behaved (in or outside of work) in a way that raises questions about their suitability to work with children.

Please provide a clear and concise record of the concern, including brief context and a chronological, factual, accurate account of the relevant incident(s). Do not add any personal opinions. Use additional pages if needed.

All records must be signed, dated, and timed.

Reporter Name:

Reporter Role:

Staff member of concern name:

Date(s) of low-level incident:

Location(s) of low-level incident:

Details of concern:

Signed:

Date/Time:

Received by:

Time of receipt:

Date of receipt:

Action(s) taken:

Signed:

Date/time:

This record will be held securely in accordance with Harlaxton's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Harlaxton may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

APPENDIX F

Health, Safety, Fire and Medical Protocols

Harlaxton is committed to providing a safe and healthy environment for all children, students and adults at risk participating in Harlaxton activities. Health, safety, and medical procedures are integral to safeguarding and apply to all day-only and residential activities.

Health and Safety Responsibilities

Harlaxton will ensure compliance with the Health and Safety at Work Act 1974, the Regulatory Reform (Fire Safety) Order 2005, and all relevant Local Authority requirements. Staff and External Group leaders must follow all Harlaxton health and safety procedures, including emergency response, fire safety, and incident reporting. The DSL, in collaboration with the Health and Safety Officer, will ensure that safeguarding considerations are embedded into all risk assessments and operational planning.

Medical Information and Care Plans

Parents, guardians, or External Group leaders must provide accurate and up-to-date medical information for all children and adults at risk prior to participation in any Harlaxton programme. This includes:

- allergies and dietary restrictions
- chronic medical conditions
- medication requirements
- mobility or accessibility needs
- mental health considerations
- emergency contacts and consent forms

Where necessary, Harlaxton will develop Individual Medical Care Plans in consultation with parents, guardians, or External Group leaders. These plans will outline required adjustments, emergency procedures, and staff responsibilities.

Medication Management

Medication for children and adults at risk must be stored securely and administered in accordance with Harlaxton procedures. Staff must:

- ensure medications are clearly labeled
- document all medication administration
- store medications in locked, supervised areas
- never administer medication without written authorisation

Children must not self-administer medication unless explicitly approved through a risk-assessed plan.

First Aid and Emergency Response

Harlaxton will ensure that an adequate number of staff are trained in First Aid, CPR, and emergency response. First aid kits and automated external defibrillators ("AEDs") will be available in designated locations. In the event of a medical emergency, staff must:

- contact emergency services (999) when required
- provide immediate first aid within their level of training
- notify the DSL and (where applicable) residential supervisors
- document the incident in Harlaxton's incident reporting system
- inform parents, guardians, or External Group leaders as appropriate

All medical emergencies must be reviewed by the DSL and Health and Safety Officer to determine whether additional safeguarding actions are required.

Fire Safety and Evacuation

All programme participants must receive a fire safety briefing upon arrival. Staff must ensure that:

- fire exits remain unobstructed
- evacuation routes are clearly communicated
- fire drills are conducted as required
- children are accounted for during evacuations
- any tampering with fire safety equipment is reported immediately

Residential staff must be trained in nighttime evacuation procedures and must know how to support individuals with mobility or sensory needs.

Illness, Injury, and Contagious Conditions

If a child becomes ill or injured:

- staff must assess the situation and provide appropriate support
- the DSL and residential supervisors must be notified
- parents, guardians, or External Group leaders must be contacted
- the individual may be isolated if contagious illness is suspected
- medical advice may be sought where appropriate

Harlaxton may require removal from the programme if their illness poses a risk to others.

Accident and Incident Reporting

All accidents, injuries, near-misses, and health-related incidents must be documented using Harlaxton's incident reporting system. Reports must include:

- date, time, and location
- individuals involved
- description of the incident
- actions taken
- follow-up required

The DSL and Health and Safety Officer will review all incidents to identify patterns, risks, or required policy updates.

External Group Responsibilities

External Groups must comply with all Harlaxton health, safety, and medical protocols. They must:

- provide accurate medical information for all participants
- ensure adequate supervision during medical or health-related incidents
- follow Harlaxton medication and emergency procedures
- report all illnesses, injuries, or medical concerns to Harlaxton staff immediately