



Safeguarding Policy & Prevent Duty

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Policy adopted

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CTF Safeguarding Policy

Statement of Policy

The Cambridge Theological Federation's policy is to take all reasonable steps to prevent and reduce harm to children and vulnerable adults when they are in contact with CTF staff, those teaching and supervising on the CTF's behalf, volunteers or students.

To effect this policy we will:

- Promote and prioritise the safety and wellbeing of children and vulnerable adults;
- Ensure that everyone understands their safeguarding roles and responsibilities;
- Make all members of staff aware of this policy and ensure new staff are given time to read it during their induction period;
- Make sure everyone who teaches or supervises on behalf of CTF is aware of this policy and the Prevent Duty;
- Undertake risk assessments when we are made aware of children or vulnerable adults and implement any actions identified;
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or vulnerable adults arising from contact with CTF staff, students or volunteers, whether the harm has taken place on CTF premises or not;
- Ensuring those in contact with CTF students receive Prevent Awareness training.

The Safeguarding Code of Practice applies to all CTF members of staff, those teaching and supervising on the CTF's behalf, volunteers and students who come into direct contact with children and vulnerable adults.

This Safeguarding Policy does not apply to the CTF's member institutions which are separate legal entities and have their own internal policies and procedures.

Definitions

A child is any person under the age of 18.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability; or
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
- Has a reduction in physical or mental capacity; or
- Is in the receipt of any form of healthcare; or
- Is detained in custody; or
- Is receiving community services because of age, health or disability; or
- Is living in sheltered or residential care home; or
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

It is recognised that people who meet one or more of the criteria above may not be vulnerable at all, or all of the time. However, until we have direct contact with people individually it may be impossible to identify whether vulnerability exists in relation to an activity or event we are planning. Therefore, in order to support identifying and managing potential risks of harm to people effectively, and for the purposes of this policy only, a vulnerable adult will be identified as a person aged 18 or over who meets one or more of the criteria listed above.

Examples of activities involving children and vulnerable adults might include:

- Teaching students who are under 18;
- Research work which involves direct physical contact with children and/or vulnerable adults;
- Work experience students under 18;
- First aid delivery;
- Open days;
- Working with disabled students;
- Teaching a student with a mental illness.

Types of Abuse

A person may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm. There are four main forms of abuse, although there are variations within these:

Physical Abuse	Deliberate physical harm to children and vulnerable adults or any other form of harm which causes illness in a child or vulnerable person.
Sexual Abuse	Forcing or manipulating a child or vulnerable adult to take part in sexual activities.
Neglect	This involves the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development.
Emotional Abuse	This involves the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's emotional wellbeing and/or development.

Roles and Responsibilities

The **Board** takes overall ownership of the policy and will promote the importance of safeguarding within the CTF. They will periodically review the policy and update it to ensure compliance with relevant legislation and internal change.

The **CTF Safeguarding Lead** is the initial point of contact where any allegations of abuse against children and vulnerable adults are raised. They hold responsibility for:

- Dealing with any reported suspicions and allegations of abuse of children or vulnerable adults within the CTF;
- Providing appropriate information when making referrals to external agencies (such as Social Services or the Police) in all cases of suspected abuse of children or vulnerable adults;
- Ensuring that appropriate records are kept in relation to the reporting of suspected abuse;
- Ensuring that relevant staff had received training;
- Ensuring that Risk Assessments take place where required.

The **CTF Prevent Lead** is the initial point of contact where any suspicions of people being drawn into terrorism are raised. They hold responsibility for:

- Dealing with any reported suspicions and allegations of people being drawn into terrorism within the CTF;
- Providing appropriate information when making referrals to external agencies (such as Channel or the Police);
- Ensuring that appropriate records are kept;
- Ensuring that relevant staff have received training.

The **member of staff teaching** or leading an activity or event which involves working with children and vulnerable adults is responsible for:

- Identifying if the Safeguarding procedure is applicable to a particular activity or event;
- Ensuring that staff, volunteers and students working with children and vulnerable adults are familiar with the contents of the policy and its application before any new or changed activity/event;
- Completing /updating a risk assessment;
- Ensuring implementation and review of the actions identified by the risk assessment.

All staff, teachers, supervisors, students and volunteers working with children and vulnerable adults within the CTF should be familiar with this policy. In addition, they should, wherever possible, conduct themselves in accordance with the Safeguarding Code of Practice.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the CTF Safeguarding Lead.

Every individual who becomes aware of any suspicions or allegations regarding people being drawn into terrorism is required to report this immediately to the CTF Prevent Lead.

Children and Vulnerable Adults Risk Assessment Procedure

The Risk Assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate):

- Recruitment to a new or existing post which involves working with children and/or vulnerable adults;
- The commencement of new activities or events involving or potentially involving children and/or vulnerable adults;
- Changes being made to activities or events involving or potentially involving children and/or vulnerable adults;
- A work experience placement is planned;
- The CTF becomes aware of new children or vulnerable adults or changes to vulnerabilities.
- A member of staff, teacher or supervisor discloses a relevant criminal record.

A risk assessment must be completed in advance of the relevant activity or event using the Children and Vulnerable Adults Risk Assessment form. Risk assessments must be completed by a competent person; that is, is someone who understands the job, activity or event and is aware of the hazards.

The purpose of the risk assessment is to enable the CTF to identify, mitigate and remove any potential risks relating to contact with children or vulnerable adults. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or vulnerable adult and considering whether the activity could be supervised or observed by others.

Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

The risk assessment should:

- Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised;
- Consider if there will be children and adults who are particularly at risk;
- Consider whether any children or vulnerable adults have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties;
- Identify any potential areas for harm;
- Evaluate the risks;
- Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented;
- Identify those situations that would require a DBS check or a basic disclosure check.

Risk Assessments and records will be kept in accordance with the Records Retention Schedule. Where an activity is ongoing but unchanged, the risk assessment should be reviewed regularly to ensure that the measures put in place are still relevant and appropriate.

Reporting suspicions and allegations

This policy requires that any suspicions and allegations involving harm to children and vulnerable adults are referred to the CTF Safeguarding Lead (or Prevent Lead, as appropriate) to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect staff, teachers, supervisors, students and volunteers from false or unfounded accusations.

Concerns for the safety and wellbeing of children and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse. **Everyone has a responsibility to act if they have any concerns about someone's behaviour towards a child or vulnerable adult.**

If you have a concern

- Listen carefully without making or implying any judgment as to the truth of the complaint or accusation.
- Capture all of the details of an allegation on an Incident Report form.
- Do not promise confidentiality when a concern is raised or an accusation made as information you receive will need to be passed on to others.
- Inform the CTF Safeguarding Lead (or Prevent Lead, as appropriate) and provide them with the Incident Report form.
- Only discuss the incident or concern with those people who need to know.
- In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), contact the police, social services or other appropriate authorities directly.

It is not your responsibility to decide whether abuse has taken place.

If you are worried about sharing concerns about abuse speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111).

The CTF Safeguarding Lead (or Prevent Lead, as appropriate) will:

- Carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action.
- If relevant, consider whether it is necessary to notify the Principal of the member institution to which the member of staff or student belongs.
- Consider whether the situation is such that there is a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.
- Only inform those people who need to know.
- Ensure incident report forms and other records are kept confidentially.

Safeguarding Code of Practice

When working with children and/or vulnerable adults, CTF staff, those teaching or supervising for the CTF, students, and volunteers are expected to take account of the guidance below.

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
- Wherever possible, work in an open environment with children where they can be seen by others.
- Avoid unnecessary physical contact.
- Avoid taking a child or vulnerable adult alone in a car on journeys, however short.
- Avoid taking a child or vulnerable adult to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person).
- In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
- Avoid showing favouritism towards particular participants.
- Ensure that any allegations are recorded and report incidents of alleged abuse, concerns about poor practice to the CTF Safeguarding Lead.
- Report any concerns about poor practice to the CTF Safeguarding Lead.
- Report any accidents to the CTF Safeguarding Lead.
- Avoid personal relationships with a child or vulnerable adult.
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of "a position of trust".
- Staff, students and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
- Inappropriate or abusive comments should not be made on social media.
- Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted.
- Participate in training available to you to support you in your work with children and vulnerable adults.
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
- Do not take children or vulnerable adults to your home.
- Maintain confidentiality about sensitive information.
- Obtain written consent (from parents/guardians in the case of children) before images of children or vulnerable adults are taken. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement.



Prevent Duty

CTF Prevent Duty

The CTF (company number 04700056) is in the scope of Prevent legislation because it is a registered higher education provider with the Office for Students. This means that the CTF “must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism”¹.

Because the CTF’s member institutions (‘Houses’) are independent legal entities and are not registered with Office for Students they do not come under the scope of the Prevent Duty. Not everyone at a House is a CTF student but those students at Houses who are registered with CTF come under the scope of the duty when the CTF is acting in its capacity as a higher education provider. The Houses are not comparable to the Cambridge Colleges which are only in the scope of the Prevent duty by specific legislation.

The Prevent Duty does cover:

- All full time & part time students registered with CTF, whether taught in classrooms in the UK, including in Enfield, on a CTF placement, or through distance learning.
- Events arranged by CTF, including Federation worship.
- Activities at the Bounds House premises (which is the only property owned by CTF)
- Those teaching on behalf of the CTF, whether employed by the CTF or not.

The Prevent Duty does not cover:

- CTF students taught abroad (eg Africa, Hong Kong)
- Participants on unaccredited courses
- Events arranged by Houses or their students which are not events arranged on behalf of CTF².

Freedom of expression

The CTF has duties to ensure freedom of speech and academic freedom which are not overridden by the Prevent duty.

Risk Assessment

The CTF has undertaken an assessment of the risk of students and staff being drawn into terrorism. The Board considers that the policies and procedures in place, as detailed in this document and risk assessment, are sufficient to minimise the risk to a “**low**” level.

Speakers

The CTF has adopted a policy and procedure for events with external speakers (see below) to minimise the risk of speakers drawing students and staff into extremism. The CTF rarely arranges events outside of regular curriculum teaching or research seminars. There is a “**very low**” risk of CTF events taking place that will draw staff or students into extremism.

¹ Counter-Terrorism and Security Act 2015. Part 5, Chapter 1

² Inviting other students to join events does not necessarily make them CTF events

Training

All CTF staff and all those who teach or supervise CTF students are required to take Prevent Duty awareness training. We recommend use of the Home Office training which can be found at www.elearning.prevent.homeoffice.gov.uk.

Welfare, pastoral care and chaplaincy support

The CTF only employs administrative staff. It does not employ any staff with pastoral or chaplaincy roles.

The CTF has no faith spaces in the Bounds House office, which is its only property.

All students who also belong to a House are provided with welfare, pastoral care and chaplaincy support through that House.

Students admitted directly to the CTF only have access to welfare, pastoral care or chaplaincy support through informal arrangements with staff at one of the Houses, as the need arises. The only students admitted directly to the CTF are part time students studying for a Professional Doctorate with Anglia Ruskin University.

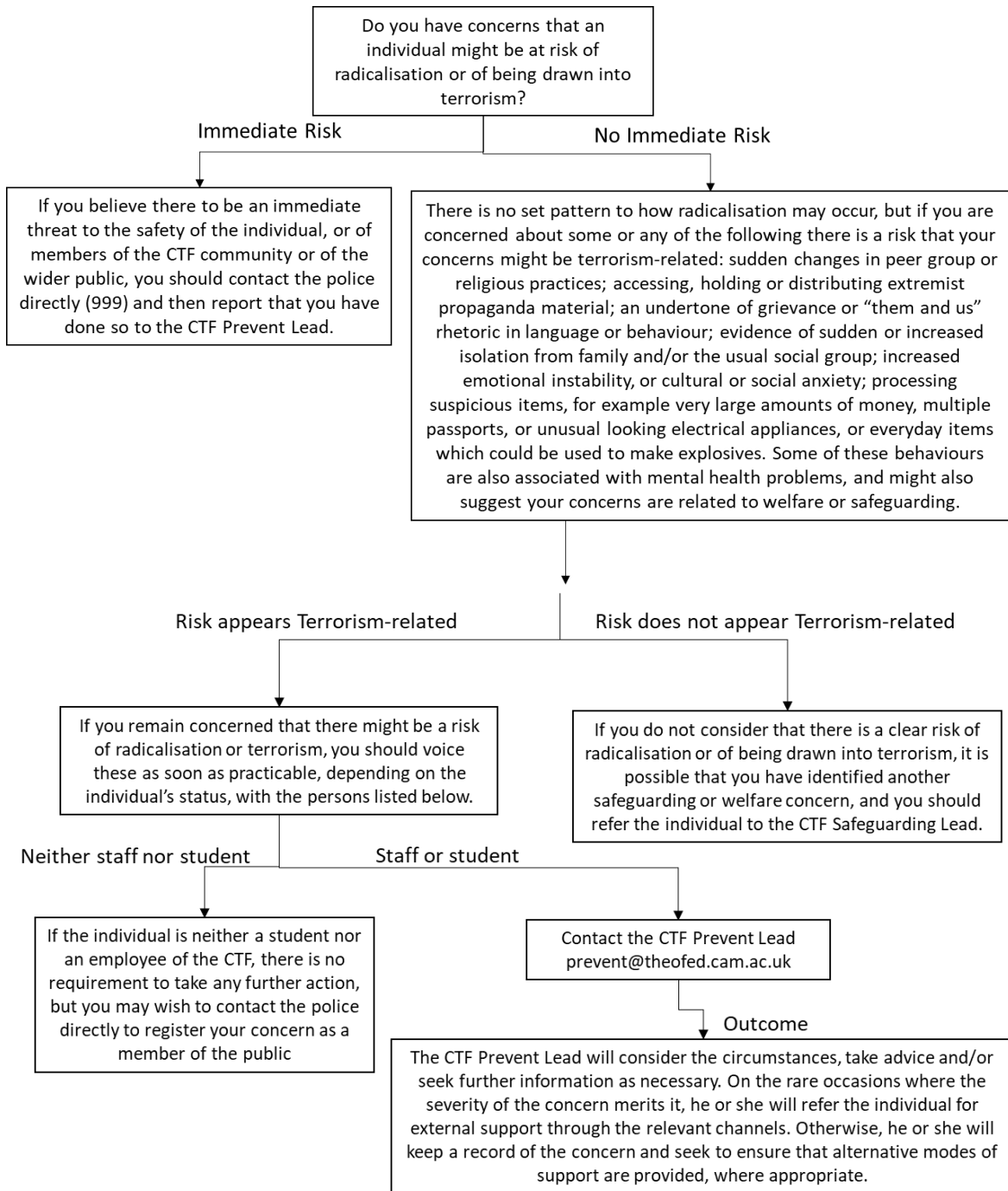
IT policy

The CTF's IT policy is available at www.theofed.cam.ac.uk/policies. It applies to everyone who uses the CTF's IT infrastructure and services, which includes all registered students, CTF staff, and some teaching and administrative staff from the member institutions.

Students union

There is no students union at the CTF. A Student Forum exists as a consultative and representative group.

Process for reporting Prevent concerns



The CTF Prevent Lead will report relevant concerns about BTh students to the Divinity Faculty on administrator@divinity.cam.ac.uk.

The CTF Prevent Lead will report relevant concerns about Anglia students to Paul Bogle (paul.bogle@anglia.ac.uk) as Secretary & Clerk and copied to his PA louise.andrews@anglia.ac.uk.

Events with External Speakers policy and procedure (Prevent Duty)

Policy

All speakers at Cambridge Theological Federation (CTF) events have a responsibility to abide by the law and:

- Must not contravene the CTF's Statement on Freedom of Speech and Expression
- Must not advocate or incite hatred, violence or call for the breaking of the law
- Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- Must be mindful of the risk of causing offence to or seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge
- Are not permitted to raise or gather funds for any external organisation or cause without the CTF's express permission.

As a condition of being able to participate in CTF events, all external speakers are required to act in accordance with the policy statement above at all times.

Definitions

An **external speaker** is deemed to be anybody who is neither a registered student, a member of staff or a Trustee of the CTF. For the purposes of this policy, students, staff and trustees from each of the CTF's member institutions are treated as "internal speakers", as are teaching staff from Universities with whom we have partnership contracts (Anglia Ruskin University, Durham University and the University of Cambridge).

An **event** may be one that is hosted on CTF premises or in the name of the CTF at an external venue.

Booking requests for events with external speakers

Booking requests for events with external speakers should be made to the Bounds House office using the contact details on the website: www.theofed.cam.ac.uk/contact. Bookings must be made no later than 14 days before the date of the event. This is to allow for adequate checks as well as allowing time for alterations to the event if necessary.

Events involving external speakers may not be publicised until the event is confirmed. This includes advertisement through any social media platform.

Events with enforced segregation will not be accepted.

Approving an event

In deciding whether to approve an event, the CTF aims to abide by all relevant legislation, in particular its duties to ensure freedom of speech with reference to the Education Act 1982, its duty to prevent people from being drawn into terrorism with reference to the Counter Terrorism and Security Act 2015 and its obligation to prevent individuals from discrimination under the Equality Act 2010.

The CTF Prevent Lead is responsible for risk-assessing the event based on:

- The potential for any decision to limit freedom of speech
- The potential for the event going ahead to cause risk to the CTF's reputation
- The potential for the speaker's presence on site to cause fear or alarm to students or members of staff and/or to give rise to breach of peace
- The potential of a speaker to cause incitement to commit criminal acts, the expression of hate speech, or radicalisation of attendees.

One of the following decisions will be made:

- To permit the event to go ahead without restriction
- To permit the event to go ahead with agreed steps to reduce risk (e.g. the inclusion of opportunities to debate or challenge the view being held)
- To permit the event but refuse a particular speaker
- To refuse the event.

In the spirit of debate, the Federation will normally seek to ensure that events or speakers identified as posing a risk will go ahead subject to the agreement of appropriate safeguards. Cancellation of an event will only occur in exceptional circumstances, for example on the advice of Police.

Reasons for refusing an event booking could include (but are not restricted to):

- A person or group on, or linked to, the UK Government list of proscribed terror organisations
- Talks by organisations generally considered to be extremist
- A speaker who is known to have spoken previously at another institution on a topic that has caused fear or intimidation of students or staff
- A speaker is considered to be accepted in the mainstream as being highly controversial
- A link or links to any person or group that has been connected with any controversy of a negative or positive nature
- A speaker who has significant profile and attracts a following that could create crowd control and safety issues.

Steps that can be taken to reduce risk (at the organisers' cost) include:

- Appoint an independent Chair for the event
- Requesting submission of the speeches in advance of the event
- Placing a limit on attendees
- Seeking declaration of attendees in advance of the event
- Requesting stewards be provided by the organisers
- Placing a limitation on what attendees may bring to the event, which may include banning food or drink or anything that could be used as a potential weapon
- Placing a ban on banners, flags, placards or similar items being allowed into the venue and its immediate surroundings
- Altering the conduct of the meeting and/or its facilitation.

Cambridge Theological Federation Prevent Risk Assessment

This assessment follows the requirement in the “Prevent Duty Guidance for higher education institutions in England and Wales” (HM Government revised July 2015) for higher education bodies “to carry out a risk assessment for their institution which assesses where and how their students might be at risk of being drawn into terrorism”.

Where students might be at risk of being drawn into terrorism

The activities that CTF carries out in exercise of its functions are:

- Teaching students
- Arranging practical placements for some students
- Arranging corporate worship at non-CTF locations
- Administering student records
- Maintaining library systems

The first three of these could conceivably provide opportunities for drawing students into terrorism.

The CTF does not have any residential or social facilities.

How students might be at risk of being drawn into terrorism

Students could be drawn into terrorism by:

- Teaching staff
- Administrative staff
- Other students
- Speakers from outside of the CTF
- People they meet whilst on placements
- Online activity

Likelihood of students being drawn into terrorism

There is nothing in the taught curriculum that is likely to draw students into terrorism. Research topics that increase the likelihood of students being drawn into terrorism are not permitted.

Students do not have sustained contact with administrative staff and so are unlikely to be drawn into terrorism by them.

The likelihood of students being drawn into terrorism by other students is low, particularly as the majority of students are either in or training for ordained ministry in the Christian churches. The risk is marginally higher with students on non-ordination programmes (eg the MAs with Anglia Ruskin) but they are still considered a “**low**” risk.

The CTF does not arrange events outside of the curriculum. All speakers from outside the CTF are engaged to teach content regulated by the curriculum and are chosen for their expertise in the relevant area. There is a “**low**” risk of engaging speakers likely to draw students into terrorism.

It is harder to manage the contacts that students will have whilst they are on placements provided by CTF. However, the placements are all in a pastoral context and designed not to put students at any risk. They include structures for support and feedback with tutors. In this context the risk of students being drawn into terrorism is “**low**”.

The CTF does not monitor online activity of staff or students. Whilst this is a higher risk than other areas, purely because of unmediated access to extremist views, the Board considers that in the context of the Federation the likelihood remains "**low**".

Federation Worship is primarily Christian in context, though occasionally has elements from other Abrahamic faiths. It is attended by students and staff from across the Houses. It does not provide an opportunity for drawing students into terrorism.

Actions taken to minimise the risk of students being drawn into terrorism

All staff who teach and supervise CTF students in the UK are required to undertake Prevent awareness training. All CTF administrative staff undertake Prevent awareness training.

A clear reporting procedure is in place for responding to concerns about students being drawn into terrorism.

The following policies assist minimising the risk:

- Anti-bullying and harassment
- Complaints procedure
- Freedom of speech
- IT policy
- Placement policy
- Social Media

There are no particular measures relating to the physical management of the estate in the context of the Prevent duty. The estate only consists of one building where the CTF's office is located. Any external events held in its meeting rooms would be in accordance with the "Risk management of external events" policy.

The Prevent duty is an item on the CTF's main Risk Register.