

# Safeguarding Code of Conduct

**Version:**

1.2

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UCAS – Safeguarding Contact Sheet	
<b>UCAS Contact Details</b>	UCAS Rosehill New Barn Lane Cheltenham Gloucestershire GL52 3LZ  03714680468
<b>Designated Safeguarding Lead (DSL)</b>	Tessa Yates (General Counsel and Company Secretary) 01242 544736 <a href="mailto:safeguarding@ucas.ac.uk">safeguarding@ucas.ac.uk</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Kevin Allison (Chief Financial Officer) 01242 544749 <a href="mailto:k.allison@ucas.ac.uk">k.allison@ucas.ac.uk</a>
<b>Local Safeguarding Leads (LSL)</b>	Aimee Okafor (Events Team) 01242 544808 <a href="mailto:a.okafor@ucas.ac.uk">a.okafor@ucas.ac.uk</a>  Courteney Sheppard (CXC Team) 01242 223783 <a href="mailto:c.sheppard@ucas.ac.uk">c.sheppard@ucas.ac.uk</a>  Kim Eccleston (Schools Team) 01242 544946 <a href="mailto:k.eccleston@ucas.ac.uk">k.eccleston@ucas.ac.uk</a>
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<b>UCAS Executive Officer with Safeguarding responsibility</b>	Jo Saxton <a href="mailto:J.Saxton@ucas.ac.uk">J.Saxton@ucas.ac.uk</a>

<b>Local Authority Designated Officer (LADO)*</b>	<a href="mailto:amadmin@gloucestershire.gov.uk">amadmin@gloucestershire.gov.uk</a> Advice request form, <a href="#">here</a> 01452 426994
<b>Gloucestershire Safeguarding Children Partnership</b>	<a href="mailto:GSCP@gloucestershire.gov.uk">GSCP@gloucestershire.gov.uk</a>
<b>Gloucestershire Children and Families Front Door Service (Multi-Agency Safeguarding Hub)</b>	<a href="mailto:childhelp@gloucestershire.gov.uk">childhelp@gloucestershire.gov.uk</a> 01452 426565 (9am to 5pm) 01452 614194 (Out of Hours)

\*This is the administrative area for UCAS' offices, however, it may likely be more appropriate to contact the LADO in the Local Authority where the concern is reported the child is based.

## 1. Introduction

The safety and welfare of everyone working with, and engaged in UCAS' activities, especially children, is our highest priority. As an organisation with a vision of "*All who could benefit from higher education, do*" which seeks to support applicants in their journey to higher education, we interact with many under-18-year-old students when they access UCAS' services or come into contact with UCAS during our events and other activities.

This Code of Conduct highlights the importance of safeguarding to UCAS' culture and values, and it sets out how UCAS staff, and third parties acting on our behalf, should behave when interacting with children or vulnerable adults. It also outlines the process to be followed for reporting any safeguarding incidents or concerns.

Safeguarding legislation defines children as young people under the age of 18. A vulnerable adult is defined as an individual aged 18 or over who may need care and support due to age, illness or disability. They may be unable to protect themselves from harm or exploitation because of their situation. This includes those who require community care services or at risk of abuse or neglect.

This Code of Conduct must be read in conjunction with UCAS' Safeguarding Policy, Staff Code of Conduct, UCAS' Business Partner Code of Conduct, and the Whistleblowing Policy.

## 2. Requirements for all staff and third parties acting on UCAS' behalf

All staff are expected to conform to the following code of conduct when coming into contact with under-18s or vulnerable adults. Even if your role does not routinely require such interaction, there may be times when you encounter students under the age of 18 (i.e. children) at Rosehill/UCAS' other office spaces or other locations, including at UCAS events, and this is why the following expected behaviours apply to everyone.

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

- a. Have read and be familiar with this policy, the Safeguarding Policy, whistleblowing procedures and be aware of systems, policies and procedures within UCAS which support safeguarding;
- b. Be aware of the signs of abuse and neglect so that they are able to identify children 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;

- c. To keep UCAS informed on an ongoing basis of any information that might have implications for the safeguarding of the children who come into contact with UCAS; and
- d. Make a direct referral to Children's Social Services immediately if, at any point, there is a risk of immediate serious harm (as explained at section 7.1 of this policy).

**You MUST:**

- a. Respect the rights, dignity and worth of every individual and treat everyone with equality.
- b. Ensure that the welfare and safety of under-18s and vulnerable people is your top priority.
- c. Be a good role model and display consistently high standards of behaviour and professionalism.
- d. When working or communicating with a child or vulnerable adult (including by telephone, email, and social media), maintain an appropriate distance, both professionally and physically.
- e. Remember that someone else might misinterpret your words or actions, no matter how well intentioned.
- f. Ensure that when you have face-to-face contact with children or vulnerable adults it is in an open environment (i.e. not in closed meeting rooms).
- g. Bear in mind the fact that children and vulnerable adults may have complicated and/or traumatic backgrounds which could make them sensitive to certain issues.
- h. Take any safeguarding disclosures seriously and report them in writing using the procedure outlined below.
- i. Be alert to any signs of possible abuse or neglect displayed by children or vulnerable adults and report your concerns promptly and confidentially to UCAS' Designated Safeguarding Lead (DSL) via the [safeguarding@ucas.ac.uk](mailto:safeguarding@ucas.ac.uk) email address.

**You must NEVER:**

- a. Have physical contact with, or get too close to, children or vulnerable adults (Note: There may be occasions when limited contact is appropriate, e.g. a handshake in a professional environment).
- b. Be unaccompanied with children or vulnerable adults when representing UCAS, except in open spaces with other adults in the vicinity.
- c. Allow an individual student to be filmed or photographed without written consent having been provided in advance. For group photographs or filming in communal areas, you must ensure that suitable notices are in place notifying students that such photographs or film recordings will be taking place during set time periods to ensure students may exclude themselves from such areas so they do not appear in such photographs or film recordings.
- d. Use actions or language that may cause a child or vulnerable adult to lose self-esteem or confidence, or to feel uncomfortable, including use of inappropriate language.
- e. Make sexually suggestive remarks to a child or vulnerable adult.
- f. Share your personal contact information with a child or vulnerable adult or engage in personal communication with them.
- g. Record the contact details of a child or vulnerable adult outside UCAS application systems for personal or non-work related use.
- h. Allow allegations of harm made by a child or vulnerable adult to go unreported.

**3. Breaches of the Code**

UCAS has a zero-tolerance approach for any form of potentially harmful behaviour and has adopted this Code of Conduct to ensure that effective safeguarding mechanisms are in place. Breaches of this Code of Conduct or the Safeguarding Policy will be taken seriously and could result in disciplinary action being taken.

In the case of a breach of this Code being reported that involve a third party, UCAS will conduct an investigation confidentially with the party in question, which may include termination of relevant services.

UCAS' Designated Safeguarding Lead will also determine whether it is appropriate to make a referral to a third-party agency or the police in relation to any breaches of this Code.

Any investigations into breaches of this Code will be conducted thoroughly and fairly and resulting courses of action are appropriate and proportionate. Further measures will be taken to reduce the risk of a recurrence, where necessary.

#### **4. How to report a safeguarding incident or concern**

**If a child or adult at risk is in immediate danger, or there is an immediate threat of harm, you must first put in place measures to ensure they are kept safe, insofar as you can do so without risk to your own safety. A referral should then be made to the Local Authority and/or Police immediately. If a crime is in progress, or a life is at risk, dial emergency services on 999.**

**If you work in the CXC, Schools or UCAS Events Team**, you should report any safeguarding incident or concern promptly in writing to your Local Safeguarding Lead (LSL) in the first instance, whose contact details are at page 2. The LSL will then follow the procedure at Annexure 1 below.

Staff in all other teams should follow the procedure at Annexure 1 below and send their concerns directly to UCAS' Designated Safeguarding Lead (DSL), Tessa Yates, and her deputy Kevin Allison, whose contact details are on page 2.

Alternatively, you can report your concern confidentially as per the Speak up or whistleblowing policy, using the Navex Global. If you use this service, you can remain anonymous if you wish. If you are prompted for an access code, please enter 'ucas'.

- (a) by calling 0-800-89-0011. Then at the English prompt, dial 833-558-1922. If you are prompted for an access code, please enter 'UCAS'; or
- (b) online via [ucas.ethicspoint.com](http://ucas.ethicspoint.com)

Alternatively, the issue can be raised directly with the Chair of the Audit Committee, Mark Felix (email: [m.felix@ucas.ac.uk](mailto:m.felix@ucas.ac.uk)).

UCAS will not tolerate any members of staff who seek retribution from, or who harass, victimise or otherwise mistreat another member of staff who has raised a concern. Appropriate action will be taken which may include disciplinary, up to summary dismissal.

## Annex

### Safeguarding Reporting Procedure – Concerns about Children

