UNDER 18s SAFEGUARDING POLICY

MATTERS RELATING TO SAFEGUARDING ISSUES SHOULD BE ADDRESSED TO THE HEAD OF STUDENT HEALTH AND WELLBEING SERVICES, MS KAREN JAMES

QUERIES ABOUT, AND COMMENTS ON, THE POLICY SHOULD BE ADDRESSED TO THE ASSISTANT UNIVERSITY SECRETARY, MR ROBERT MELVILLE
INTRODUCTION

There are important implications of having children and young people on University premises including issues relating to safeguarding, health and safety, negligence, consent and data protection. The law protects those under 18 in different ways depending on the age of the children and young people involved, but all present risks to the University.

The University is committed to safeguarding and promoting the welfare of under-18s and vulnerable groups who participate in its organised activities or make use of its services, including students taking part in activities both on and off campus. The University must take reasonable steps to promote and safeguard the welfare of children, young people and vulnerable groups and ensure compliance with relevant legislation and guidance.

Children and young people may visit University premises for a variety of purposes: for open days, attendance at summer schools, as part of initiatives to generate early interest in Higher Education, accompanying adult visitors, or as trespassers. There are students on programmes who are under 18 for a period of their registration. Researchers may wish to involve under-18s in their research, and funding involving children and young people may be dependent on having in place procedures for checking staff, a safeguarding policy and ethical approval.

This document draws on the major policy statements relating to safeguarding. Use has also been made to the publication Working together to safeguard children; a guide to inter-agency working to safeguard and promote the welfare of children, together with other advice issued by the Department for Schools.

The intention is that this becomes a working document, which provides advice and support for those engaged in programmes and activities with children and young people. The document is divided into sections for ease of access, and there is a summary of the contents.

Robert Melville
Assistant University Secretary

Document History

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SUMMARY OF CONTENTS

Section 1 University Safeguarding Policy

This section sets out the University’s commitment to ensuring the safety of children and young people, and outlines the responsibilities of those who work with children and young people. The Policy is as much for an external audience as for staff and volunteers.

Heads of school/department are to make this section available to all staff and volunteers working with children and young people, and particularly directors of programmes and activities.

It is the responsibility of directors of programmes and activities to ensure that all staff and volunteers understand the Safeguarding Policy in advance of the commencement of the programme or activity.

A copy of the Safeguarding Policy should be given on request to any parent, guardian, carer, sponsor or partner institution.

Section 2 Safeguarding Code of Practice

This section supplements the University Safeguarding Policy, by setting out operational matters of concern to all staff and volunteers.

Heads of school/department are to make this section available to all staff and volunteers working with children and young people and, in particular, directors of relevant programmes and activities.

It is the responsibility of directors of programmes and activities to ensure that all staff and volunteers understand the Code of Practice in advance of the commencement of the programme or activity.

Where necessary or appropriate, directors of programmes and activities may supplement this Code of Practice by a statement specific to the programme or activity. Any supplementary statement is to be compatible with the University Code of Practice.

Section 3 Safeguarding – Guidelines for Staff and Volunteers

This section sets out guidelines for staff and volunteers on the importance of taking steps to avoid any allegations of child
abuse and the required action in the event that there are any allegations.

*Directors of programmes and activities* are to make this section available to *all staff and volunteers* working with children and young people, and to ensure that *all staff and volunteers* understand the Guidelines in advance of the commencement of the programme or activity.

**Section 4  Health and Safety**

This section sets out the health and safety issues relating to programmes and activities for under 18s, in particular relating to duty of care, risk assessments, basic safety precautions, accidents, fire safety, activities away from University sites and medication.

*Directors of programmes and activities* are to ensure that

(a) this section is made available to *all staff and volunteers* working with children and young people on the programme or activity;

(b) *all staff and volunteers* understand the requirements relating to health and safety in advance of the commencement of the programme or activity;

(c) all risk assessments are properly completed, recorded, discussed with relevant staff and volunteers, and stored; and

(d) there are arrangements in place for recording, investigation and reporting all accidents, incidents and near misses.

**Section 5  Insurance**

This section sets out the requirements relating to insurance for programme and activities for those under the age of 18 years.

The section is relevant to *Heads of school/department* and *directors of programmes and activities*. Where it is necessary, this section needs making available to *relevant staff and volunteers*.

It is the responsibility of *directors of programmes and activities* to ensure that

(a) appropriate insurance arrangements are in place in advance of the commencement of the activity.
(b) **all staff and volunteers** understand the requirements relating to insurance in advance of the commencement of the programme or activity.

**Section 6**  
**Organizing Formal Activities for Children and Young People at the University: A Guide for Directors of Programmes and Activities**

This section sets out the main issues of a practical nature that need consideration when organizing a programme or activity. The practical arrangements will differ. The purpose of the advice is to prompt those concerned with planning and organization to consider the range of relevant issues.

The section is relevant to **Heads of school/department and directors of programmes and activities**. Where it is necessary, this section needs bringing to the attention of **relevant staff and volunteers**.

**Section 7**  
**Disclosure and Barring Service**

This section sets out arrangement for obtaining a disclosure from the Disclosure and Barring Service.

It is of relevance for those responsible for the engagement of staff and volunteers for programmes and activities for children and young people.

**Section 8**  
**Work Experience for Children and Young People at the University**

This section sets out the requirements relating to work experience for people under the age of 18 years.

It is of relevance for those members of staff arranging work experience.

**Section 9**  
**Employment of Children and Young People at the University**

This section sets out the requirements relating to the employment of people under the age of 18 years.

It is of relevance for those members of staff arranging such employment.

**Section 10**  
**Contracts with Children and Young People**

This section sets out information relating to contracts with children and young people.
It is of relevance to those members of staff responsible for the contracting of services to children and young people.

Section 11  Complaints made by Children and Young People, Including Students under the Age of 18

This section sets out the arrangements should a child or young person wish to make a complaint.

The procedure follows the University complaints procedure for students, with the exception that account needs taking of the parent, guardian or carer.

The section is of relevance to directors of programmes and activities.

Section 12  Children and Young People as Research Participants

This section identifies a number of issues relating to children and young people as research participants.

It is essential for those engaging in research to comply with the requirements of the University Research Ethics Policy relating to children and people.

Section 13  Guidance Relating to Children and Young People on University Site other than for University Programmes and Activities

This section sets out the policy of the University relating to children and young person on University sites, other than for programmes and activities specifically organised for them.

Section 14  Photographs, Videos, Websites and Webcams

This section sets out the policy of the University relating to the use of photographic images of children and young person on all University related activities.

The section is relevant to Heads of school/department and directors of programmes and activities. Where it is necessary, this section needs making available to relevant staff and volunteers.

Section 15  Arrangements for Under 18s Arriving at the University from Outside the United Kingdom, Islands and Eire

This section sets out the policy of the University relating to the arrangement for ensuring that children from outside the UK, islands and Eire are met at the point of entry to the UK and transported to the University campus.
The section is relevant to heads of Admissions Agencies. Where it is necessary, this section needs making available to relevant staff and volunteers.
SECTION ONE

UNIVERSITY SAFEGUARDING POLICY

1.1 The Children Act 1989 s105(1) defines a ‘child’ as a person under the age of 18. The Management of Health and Safety Regulations 1999 s 1(2) regard a ‘child’ as a person who is not over the minimum school leaving age and a ‘young person’ as a person who has not attained the age of 18. For the purpose of this policy, a ‘child’ is under 16 and a ‘young person’ is over 16 but under 18. Both children and young people are included in this policy.

Statement of Principles

1.2 Canterbury Christ Church University recognises children and vulnerable groups have a right to protection and is committed to providing, as far as is reasonably practicable, an environment that is safe from harm for those under the age of 18.

1.3 All children and young people have the right to protection from abuse, freedom from injury and a safe and healthy environment while in the care of the University.

1.4 The University seeks to ensure that appropriate procedures are in place for dealing with allegations of child abuse. The University will respond to any allegation of abuse with all due speed.

1.5 Safeguarding depends on all staff and all agencies working together, and overrides confidentiality, relationships with the family and hierarchy.

Managerial Responsibility

(a) Senior Management

1.6 The responsibility for oversight of the University’s Safeguarding Policy rests with the Vice-Chancellor, with delegated responsibility to the relevant members of the University.

(b) University Safeguarding Co-ordinator

1.7 The Vice-Chancellor nominates an appropriate person as the University’s Safeguarding Co-ordinator, who will be a person of sufficient seniority in the University. The Safeguarding Co-ordinator is the senior member of staff responsible for safeguarding issues within the University.

1.8 The nominated University Safeguarding Co-ordinator is Ms Karen James (Head of Student Health and Wellbeing Services).

1.9 The Safeguarding Co-ordinator may designate other full-time members of the University staff to cover for absences or to act on behalf of the Co-ordinator.
1.10 Heads of school/department should identify the University’s Safeguarding Co-ordinator to all staff and volunteers organising activities involving children and young people, and draw attention to this Safeguarding Policy and associated documentation. This extends to those engaged in activities such as summer schools, research, and University programmes of study where there are identified students under 18.

(c) Admissions

1.11 Offers of admission to students who will be under 18 at registration should only be made where the University is satisfied that the student is equipped to study within a mainly adult, independent learning environment. Applicants should be notified of the University’s safeguarding policy and procedures and the expectation that there will be compliance with any arrangements to support and safeguard under-18s (for example relating to licensed premises on campus and providing emergency contacts in event of welfare concerns).

1.12 It is the responsibility of the relevant Head of school/department or person responsible for recruitment and admissions for a specific programme or activity to engage in the early identification of children and young people, and to notify the appropriate members of staff of these students.

(d) Director of the Programme or Activity

1.13 The key managerial responsibility for any programme or activity rests with the individual appointed for this purpose by a member of the Senior Management Team or Head of school/department. This individual is termed ‘the director of the programme or activity’, although the title may differ according to the event.

1.14 Where appropriate, the member of the Senior Management Team or Head of school/department may appoint a person (‘appointed person’) to take responsibility for safeguarding issues for the programme or activity.

1.15 The director of the programme or activity is responsible for

(i) ensuring the programme or activity is planned, organised and delivered in accordance with this policy;

(ii) devising the means by which the policy is implemented;

(iii) providing any safeguarding statement for the programme or activity additional to this policy;

(iv) arranging the training, induction and guidance for all staff and volunteers appropriate for the programme or activity concerned, which includes drawing attention to this policy;

(v) informing the University Safeguarding Co-ordinator of specific safeguarding measures for the programme or activity, including the
name of any appointed person for those safeguarding measures where this is appropriate.

Checks on Staff

1.16 Appropriate checks will be made of staff and volunteers having substantial unsupervised contact with children and young people. These checks need to be undertaken as part of the recruitment process when entering the role. The line manager continues to be responsible for monitoring the individual once in post.

Responsibility to Report Allegations of Abuse

1.17 The Children Act 1989 section 1 requires the safety or welfare of the child or young person to be of paramount importance; it overrides all other considerations.

1.18 All members of staff working closely with children or young people have a responsibility to be alert to the possibility that a child or young person may have been, or may be at risk of being, abused.

1.19 Any member of staff or volunteer having any concern about issues relating to the protection of a child or young person should make direct contact with either the appointed person for safeguarding for the programme activity or the University Safeguarding Co-ordinator (Ms Karen James, Head of Student Health and Wellbeing Services) as soon as is reasonably practicable.

Scope of the Safeguarding Policy

1.20 This policy extends to all members of the University staff working with children and young people, even if for a temporary period. It also extends to volunteers and contract workers engaged on behalf of the University.

Availability of the Safeguarding Policy

1.21 Directors of programmes or activities should inform parents, guardians and carers that this safeguarding Policy is available on request.

Review of the Safeguarding Policy

1.22 The University will review the Safeguarding Policy periodically.
SECTION TWO

SAFEGUARDING CODE OF PRACTICE

It is important to read this Code of Practice in conjunction with the University’s Safeguarding Policy and other supporting documentation.

Safeguarding Co-ordinator

2.1 The University Safeguarding Co-ordinator is Vice-Chancellor Ms Karen James (Head of Student Health and Wellbeing Services).

2.2 The University Safeguarding Co-ordinator will be responsible for the oversight of safeguarding issues within the University.

2.3 The Safeguarding Co-ordinator may designate other full time members of the University staff to cover for absences or to act on behalf of the Co-ordinator.

2.4 The Safeguarding Co-ordinator is responsible for instituting any investigation into allegations of child abuse. It is the responsibility of the Co-ordinator to determine the means of making an appropriate University response. Depending on the nature of the allegations, such a response may include a recommendation to the Vice-Chancellor suspending from the programme or activity the person against whom allegations are made and consultation with an outside agency, such as the Kent Social Services Department or Kent Police.

2.5 The Safeguarding Co-ordinator will be responsible for informing parents, guardians or carers of any allegations of abuse. In some cases, where there is a need to refer the matter to an outside agency, it will be the responsibility of the outside agency to decide, in conjunction with the Co-ordinator, what information will be conveyed to the parents, guardians or carers and at what stage.

2.6 The Safeguarding Co-ordinator will keep all records relating to safeguarding issues, including allegations of child abuse.

Appointed Person for Safeguarding

2.7 The relevant member of the Senior Management Team or Head of school/department must appoint a suitably qualified person (‘appointed person’) to take responsibility for safeguarding issues for the programme or activity. This may be the Director of programmes or activities or another person.

Arrangements for Checks on Staff

2.8 Where at the time of appointment it is known staff will be working with children the University should make appropriate checks regarding the person’s past before the person is appointed and must make them before the person begins engaging in regulated activity. This includes taking up references and ensuring
that the referees have knowledge of the individual’s work, preferably as line manager, and that there is at least one reference obtained from the individual’s current or most recent employer.

2.9 There should be a specific request to the referee to confirm that the applicant is suitable for the post advertised and as to his or her suitability to work with children. In some cases, it may be appropriate to check on the identity of the referee. There should also be a check of the individual’s identity in conjunction with undertaking a check through the Disclosure and Barring Service (DBS) (see Section 7)

2.10 All the necessary checks need completing before the commencement of the programme or activity.

Suspicion of Abuse arising during Conversations

2.11 If during the course of conversation, a member of staff or volunteer has any reason to suspect that a child or young person has been abused, it is important to listen to the child or young person and ask only the minimum of questions. Staff should take care not to ask questions that are not relevant to their role and responsibility for the child or young person and which may also prejudice any action the police or others may wish to take in connection with any offence someone may have committed.

Recording Suspicions of Abuse arising during Conversations

2.12 In any cases of suspected abuse, the member of staff or volunteer involved should make a written report of the details as soon as possible to ensure accuracy in recalling events later if this should be necessary. A record should be made of the adults involved and action taken. Where a report of a conversation is made this should be, as far as possible, verbatim, not summarised. The report should include details of the child or young person concerned, the date and time of any allegations made, conversations reported or action taken. The full name of the member of staff of volunteer making the report should be clearly printed, and the report signed. The report is to be signed, dated, and passed to the appointed person or University Safeguarding Co-ordinator.

Reporting Suspected or Actual Instances of Abuse

2.13 If staff or volunteers, in the course of their work at the University, have a safeguarding issue bought to their attention, observe an incident of abuse themselves, or have cause for concern, they must treat this as a priority over other work and address the issue immediately.

2.14 A member of staff or volunteer who has any suspicions about any adult working with the child or young person, must immediately convey the concerns to the appointed person taking responsibility for safeguarding issues. The appointed person must immediately inform the University Safeguarding Co-ordinator. Where it is not possible to inform the appointed person, or there is no appointed person, it is essential to inform the University Safeguarding Co-ordinator.
2.15 Where an employee, such as a counsellor, student adviser or tutor, receives information suggesting that child abuse may have occurred, it is essential to ensure that the matter is reported to the appointed person or the University Safeguarding Co-ordinator as soon as is reasonably practicable. This is to enable an immediate response.

2.16 Although a recipient of information may owe duties of confidence or confidentiality to the child or young person, or other person, the welfare of the child or young person is paramount and not to pass information on resulting in abusing occurring. For this reason, it is vital for any member of staff to report as soon as is reasonably practicable any actual or suspected cases of child abuse.

2.17 The University Safeguarding Co-ordinator will acknowledge receipt of the information from the member of staff or volunteer concerned, even when notified through the appointed person. Any person making a report should notify the Safeguarding Co-ordinator should no receipt be received within five working days.

Confidentiality and Abuse

2.18 When there are any concerns, it is essential to respect the privacy of the child or young person. Only those who need to know should be told. However, members of staff or volunteers should not promise a child or young person to keep the allegations entirely confidential, since the concerns will require investigation. Staff should reassure the child or young person that only those who need to know would be told.

Bullying

2.19 The director of the programme or activity is to report any instance or allegation of bullying of children or young people to the University Safeguarding Co-ordinator, together with a report of the action taken.

Abuse of Trust

2.20 The Sexual Offences (Amendment) Act 2000 section 3 created the offence of abuse of trust. It is an offence for a person aged 18 or over to have sexual intercourse with a person under 18, or to engage in any other sexual activity with, or directed towards such a person, if in either case that person is in a position of trust in relation to the under 18 year old. This applies even if the relationship is consensual.

2.21 A person aged 18 or over ("Person A") is in a position of trust in relation to a person under that age ("Person B") if any of four conditions are satisfied. One relates to the education field and is as follows: "Person A" looks after persons who are under 18 and are receiving full-time education in an institution and "Person B" is receiving such education within that institution. This applies within the University, and includes those in a professional support role and volunteers.
2.22 It is a defence to show that the person charged did not know, or could not reasonably have been expected to know, that the other party was a person in relation to whom he or she was in a position of trust.

**Training and Guidance**

2.23 Staff and volunteers who have substantial unsupervised contact with children or young people should receive appropriate training and guidance. The director of the programme or activity should ensure that there is provision of suitable training or guidance to all staff and volunteers connected with the programme or activity, as appropriate for the activity concerned.
SECTION THREE

SAFEGUARDING - GUIDELINES FOR STAFF AND VOLUNTEERS

It is important to read these guidelines in conjunction with the University's Safeguarding Policy and Code of Practice, and other supporting documentation.

Safeguarding Co-ordinator

3.1 The University Safeguarding Co-ordinator is Ms Karen James (Head of Student Health and Wellbeing Services).

Categories of Abuse

3.2 The following categories of abuse are recognised by the NSPCC:

Online abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

Sexual abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities. This does not have to be physical contact, and it can happen online.

Physical abuse

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It includes actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child including deliberate poisoning, suffocation and Munchausen’s syndrome by proxy.

Neglect

Neglect is the ongoing failure to meet a child's basic needs, including cold or starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child’s health or development, including non-organic failure to thrive. It's dangerous and children can suffer serious and long-term harm.

Emotional abuse

Children who are emotionally abused suffer emotional maltreatment or neglect. It has sometimes been called psychological abuse and can cause children serious harm.
Child sexual exploitation

Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status.

Female genital mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons.

Bullying and cyberbullying

Bullying can happen anywhere – at school, at home or online. It is usually repeated over a long period and can hurt a child both physically and emotionally.

Domestic abuse

Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

Child trafficking

Child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold.

Grooming

A stranger or by someone they know (for example a family member, friend or professional) can groom children and young people online or in the real world.

Harmful sexual behaviour

Children and young people who develop harmful sexual behaviour harm themselves and others.

Avoiding Allegations of Abuse

3.3 All members of staff and volunteers working with children and young people must recognise they are vulnerable to accusations of abuse. Allegations made could be false, malicious or misplaced, and may be either deliberative or innocent of such intent. It is necessary for staff and volunteers to be mindful of the need to minimise the opportunities for such allegations.

3.4 To help prevent allegations of abuse, and to help those who work with children and young people, the following guidelines should be followed:

(a) Avoid one-to-one situations, and conduct all conversations in a public place. Where this is not possible, for instance for counselling and mentoring roles, it is important to draw up a risk assessment.
(b) Always be publicly open when working with children and young people, avoiding where possible situations where a member of staff or volunteer and an individual child or young person are left alone.

(c) Avoid physical contact. If physical contact is necessary, for the purposes of coaching or instruction, this should be done openly. Children and young people, as well as their parents, guardians and carers, are becoming increasingly sensitive about their being touched and this needs respecting.

(d) Staff should never over-criticise children or young people or use language that may cause them to lose self-esteem or confidence.

(e) A member of staff or volunteer should never take any individual child or young person to the home of that member of staff or volunteer.

(f) Avoid visits to a young person’s accommodation. If a visit is necessary, another adult should accompany the staff member or volunteer.

(g) For private car journeys, it is desirable to obtain in advance written permission from the parent, guardian or carer before the commencement of the journey. Only in exceptional circumstances should oral permission be relied upon. The presence of a further adult in the vehicle should be normal. A child should normally be seated in the rear of the car. It is essential to check that business use is added to or already included in the appropriate motor insurance for a private car to be used on University business in advance of the journey.

(h) It is not possible to guarantee confidentiality in all conversations with children and young people. Therefore, no member of staff or volunteer should make such a promise.

(i) Never give any personal details to a student including phone or social network details.

Appropriate physical contact with children and young people

3.5 There are occasions when physical contact with children and young people is necessary or appropriate. It is important, however, that members of staff and volunteers are aware that whenever they touch a child or young person their actions may be misconstrued.

3.6 Some examples of when it may be appropriate for staff to touch children or young people are:

- in an emergency, e.g. to prevent a child from falling
- to administer first aid
- to restrain a child, e.g. to prevent injury or damage to property
- to assist a child with a disability, such as visual or hearing impairment or with mobility difficulties
3.7 Staff and volunteers should be aware that some individuals are particularly sensitive about physical contact. If an individual’s reaction shows that he or she is uncomfortable with being touched, staff should refrain from making physical contact.

*Formal Interviews with a Child or Young Person*

3.8 There are occasions when it is necessary to interview a child or young person, or conduct a formal private discussion for tutorial or disciplinary purposes. A person of sufficient seniority should conduct such interviews, and inform another person, preferably in writing, that such an interview is to take place, the location and the expected duration.

3.9 Where possible, it is desirable to conduct interviews in a public place, for example in an open office space or a classroom. Those conducting the interviews need to consider who should be present, whether more than one person should be involved in the interviewing of the child, whether a parent, guardian, carer, or other responsible adult should accompany the child and whether the gender of the interviewer is likely to raise issues bearing in mind the children and young people being interviewed. It is important to take notes of the interview.

*Protocol for Interviews with Children and Young People*

3.10 The following protocols should be adopted when undertaking a formal interview with a child or young person:

(a) All interviewers working alone should have been subject to an appropriate check with the Disclosure and Barring Service (DBS).

(b) A record is to be made of the interview.

(c) The child or young person has the right to stop the interview at any time, either to take a break or to terminate the interview.

(d) Interviewers will keep all information confidential, except when Safeguarding concerns arise during the course of the interview. Any such concerns need communicating in the first instance to the appointed person, or if this is not possible to the University’s Safeguarding Co-ordinator.

*Interviews Concerning Alleged Abuse*

3.11 Any enquiry into allegations of abuse is only to be conducted by a person appointed for the purpose by the University Safeguarding Co-ordinator or nominee.
3.12 If you suspect a child is suffering abuse or you receive a disclosure or have concerns about another member of staff’s conduct (including volunteers) you must take immediate action.

3.13 The reporting of allegations of abuse is a sensitive issue, particularly when made against someone known personally or professionally. The knowledge that a report is likely to involve the police heightens such sensitivities. However, the overriding concern is with the safety and welfare of the child or young person.

3.14 The following points are important for those who may be confronted by revelations of alleged abuse:

(a) Stay calm and do not take hasty or inappropriate action.

(b) Listen to what the child or young person is saying to you, rather than engage in questioning. Demonstrate that you take the matter seriously.

(c) Do not stop or interrupt a child who is recalling freely significant events.

(d) Make it clear to the child or young person that it may not be possible to maintain confidentiality.

(e) Make a verbatim note of what the person says, taking care to record the date, time, place and people present. Do not summarise the statements, and do not engage in conjecture.

(f) Let the person know that you understand how difficult it must have been to confide in you give reassurance, stressing that they are not to blame. Do not offer any opinions or solutions to the young person or make any promises.

(g) Do not approach any person about whom there is an allegation of abuse.

(h) You must report the matter immediately to the appointed person who takes responsibility for safeguarding issues for a particular programme or activity and the University Safeguarding Co-ordinator.

3.15 At the earliest opportunity, you must write an account of the allegation, disclosure, behaviours, observations or the reasons for suspecting the child abuse. Include all details given by the person. It may be necessary to include a description of the observed injuries, particularly if sustained during the event. You need to submit the information to the University Safeguarding Co-ordinator who will retain the document and liaise with the Safeguarding Children Board, parents/carers and other agencies as appropriate. Any information recorded will be retained in secure/confidential files.

3.16 Careful handling at an early stage can facilitate the reporting and referral process, and may be crucial in winning the confidence of the child or young person.
3.17 Any person reporting an allegation may need to assist the competent authorities, including Social Services or the police, with any enquiries.

3.18 After any disclosure, you may feel the need to talk. You may also feel shocked, angry, upset or guilty. If this is the case, contact the University Safeguarding Co-ordinator for advice on the appropriate support arrangements.

External Relations

3.19 An allegation of child abuse, or that staff may have criminal convictions likely to affect their suitability to work with children and young people, is likely to have a high profile and be widely reported. It is essential that the Director of Marketing or member of the Senior Management Team be engaged in dealing with such matters.

3.20 In the event there is an enquiry from the media relating to any allegation, the matter should not be dealt with at department, programme or activity level, and no member of staff or volunteer is to make any comment. All members of staff or volunteers must advise the journalist that media enquiries are handled centrally by the Department of Marketing and then refer the journalist to the Director of Marketing.

Sources of Information

Department for Schools

Safeguarding children

Supervision of activity with children

Working together to safeguard children; a guide to inter-agency working to safeguard and promote the welfare of children

Keeping children safe in education

What to do if you’re worried a child is being abused

NSPCC

What is child abuse?

Keeping children safe

Child protection in the UK
SECTION FOUR

HEALTH AND SAFETY

Duty of care

4.1 The duties owed by the University, and its members of staff and volunteers, to students differ according to the age and understanding of the students.

4.2 The University owes a duty to visitors to take reasonable care in relation to the safety of the premises, as well as activities. In essence, this means that the University needs to take such measures as are reasonable in the circumstances, to ensure that visitors will be safe in using the premises to which they are invited or to which access is permitted. It is important to recognise that this duty of care extends to those who are uninvited, including trespassers.

4.3 Where children and young people, and especially those who are immature, are to any extent under the care and/or control of one or more adults, those adults have a duty to take reasonable care to ensure their safety. Nevertheless, the more mature the child or young person is, and more able to take care, the less the care that is required from the adult(s). Furthermore, where a group of children and young people is in the charge of an adult, the common law will take into account the size of the group in determining what amounted to reasonable care in the circumstances.

4.4 There is a higher duty of care owed to children and young people. The Occupier’s Liability Act 1957 requires that an occupier must be prepared for children and young people to be less careful than adults will be in a similar situation. This will be even more so if the child or young person is known to have learning difficulties or is known to have a medical condition that may make the individual more vulnerable than the average to foreseeable risk of harm.

Children and Young People on Campus

4.5 Any person in charge of children and young people owes them a duty to take reasonable care for their safety. The duty when on campus is reasonably straightforward: it is comparable to the duty of a teacher in charge of a class of the same age.

4.6 There have been many cases concerning liability for accidents suffered by school pupils while at school. Out of these cases has evolved a general principle, which identifies the standard of care for teachers as that of a reasonably prudent parent, taking into account the fact that a teacher will have responsibility for a whole class. This means that teachers are not required to achieve perfection with regard to their supervision, but that if they fall below the standards of a reasonably prudent parent and injury is suffered as a result, the teacher may be held to be negligent.
**Risk Assessments**

4.7 The Management of Health and Safety Regulations 1999 require that employers must make risk assessments and specify controls to reduce the risks of their activities. This includes risks to visitors (including students of any age) and assessments of risks to the employment or work experience of young people (see Sections 8 and 9).

4.8 Directors of programmes or activities should carry out a risk assessment of buildings to identify areas where children and young people should not be permitted to go. These areas should be clearly marked as such, protected by lock or card access and staff notified that children and young people should not be allowed in these areas.

4.9 Where a building is likely to be used by parents with children, all public areas in the building should be safe for children.

4.10 Directors of programmes or activities should carry out risk assessments for all activities undertaken as part of the programme.

4.11 When carrying out risk assessments, it is vital to attend to the requirements relating to the duty of care outlined above, and the other aspects of health and safety outlined in this section.

4.12 Directors of programmes or activities can obtain advice on the production of any risk assessment from the University Health and Safety Manager.

4.13 Where risk assessments are carried forward from a previous activity, these should be reviewed periodically. **There should be an annual review of all standing risk assessments.** It is good practice to review a risk assessment after an event, when there is an element of immediacy and as an opportunity to share experience and improve the quality of provision. The University Health and Safety Manager will facilitate the sharing of practice.

**Basic Safety Precautions**

4.14 Where it is known that a child will be present in a specific area, basic safety precautions should be taken to ensure that dangerous articles are kept securely, and proper supervision employed when they are in use.

4.15 It is important to alert other staff working within the area that a child is present, so that additional precautions can be made.

**Accidents, Incidents and Near Misses**

4.16 The accident reporting procedure is outlined in Reporting of Accidents, Incidents and Near Misses. All accidents, incidents and near misses involving children and young people need recording on the University's accident report form. Directors of programmes and activities must make clear to all staff and volunteers the arrangements for reporting accidents.
4.17 It is the responsibility of the director to ensure that there is an investigation into each accident, incident or near miss, and that the report is made to the University Health and Safety Manager as soon as is reasonably practicable.

4.18 Where a child or young person is taken to hospital, the event will need reporting to the University Health and Safety Manager using the University's accident report form.

4.19 It is the responsibility of the University Health and Safety Manager to notify the Health and Safety Executive (HSE) where this is necessary. A director of a programme or an activity should not engage in any form of direct contact with the HSE in the first instance.

4.20 The director of the programme or activity should inform the parent, guardian or carer as soon as is reasonably practicable of any injury or hospitalisation.

**Fire Precautions**

4.21 Risk assessments should include specific attention to fire safety. In particular, there needs to be consideration given to establishing arrangements for children and young people with disabilities. The University fire policies and procedures provide the framework for risk assessments relating to fire safety.

4.22 Directors of programmes and activities should be familiar with the fire evacuation procedures in place and, where appropriate, should arrange fire evacuation practices with the University Fire Safety Adviser. Such practices are particularly important where children and young people are on residential activities.

**Trips and Activities away from the University**

4.23 Experience in other organizations has shown that trips and activities away from the campus represent one of the most serious health and safety concerns for children and young people.

4.24 All external trips and activities need careful examination before the visit goes ahead. It is the responsibility of the director of the programme or activity to carry out a risk assessment. There should be close liaison between those involved at the host site, including establishing their track record and their competence. It is important to ensure that transport is safe for the age group concerned. Risk assessments should then be completed before the event.

4.25 The situation off-campus is the same, in principle, as on campus. However, there are more matters to take into consideration. It is necessary to take into account the fact that some children and young people are prone to mischief when they are on an activity away from the University. High spirits when working in a large group away from the campus may lead to the taking of risks by children or young people that are more unlikely when on their own.

4.26 When students or young people are undertaking physical and adventurous activities, it is essential to check the qualifications and suitability of the
supervising staff. It is also important to be familiar with the safety arrangements.

4.27 It is important to note that the regulation of centres and providers of facilities where children and young people engage in adventure activities falls within the Activity Centres (Young Persons Safety) Act 1995.

4.28 There should be an appropriate staff-student ratio that takes into account:

- the sex, age and ability of the individual
- the nature of the activities
- any special educational needs or medical needs the individual may have
- the experience of the adults in off site supervision
- the duration and nature of the journey
- the type of any accommodation
- the competence of staff both general and on specific activities
- requirements of the organisation/location to be visited
- the competence and likely behaviour of the individual
- first aid cover

4.29 There should always be staff of both genders where the children and young people are of both genders.

4.30 When arranging trips and visits outside the University, directors of programmes and activities should also attend to the insurance issues outlined in Section 5, as well as obtaining the consent of the parent, guardian or carer.

Emergencies

4.31 Both on and off campus, an emergency could arise. For example, a child may be asthmatic and may suffer a dangerous asthmatic attack. In that situation, the child would be unlikely to be able to give any consent to a trespass to the person. However, the staff called upon to assist would, in the unlikely event that need arises, be able to rely on the common law defence of necessity in relation to any action taken with a view to diminishing the danger for the child. Furthermore, the member of staff and the University could rely upon the Children Act 1989 section 3(5), which empowers a person who has care of a child to do what is reasonable in all the circumstances of the case for the purpose of safeguarding or promoting the child’s welfare.

4.32 The director of the programme or activity should ensure there is an emergency contact number, and that this number is readily accessible in the event of an emergency. This includes making provision for access when the director is unavailable or when the programme or activity office is closed.

4.33 An appointed member of staff should take charge when someone is injured or ill, be responsible for first aid equipment and summon emergency help when necessary. It is imperative that the director of programme or activity knows these details and about the location of the University first aiders.
Medication

4.34 It is possible that a participant on a programme or activity will have medical needs. As such, there are issues to address with regard to being responsible for these children and young people. A valuable source of information is the Department for Education publication *Managing medicines in schools* and the DENI guide *Supporting Pupils with Medication Needs*.

4.35 Medicine administration needs to be well controlled and documented. The level of supervision will depend upon the age and ability of the child. Usually secondary school children and above can take care of their own medication and undertake self-administration.

4.36 Medication should not be given without the written consent of a parent, guardian or carer. When parents, guardians or carers give consent, they need to provide details and instructions concerning administering medication to the child or young person. Where there is a need for overnight stays, the parents, guardians or carers should be asked to provide the director of the programme or activity with an appropriate written medical history and details of the child’s GP.

4.37 It is vital to know of any serious allergies and health problems that may exist. This of particular importance where there are overnight stays, or where day visitors are un-accompanied. Emergency administration is an area where additional training may be required. For example individuals with serious allergies may carry adrenalin in the form of an "epipen" for use in an emergency. Where there are children and young people who need this, it is to be applied only by those trained in their use. The director of the programme or activity should have a clear written plan, shared with the relevant staff and volunteers, of the action to be taken in such circumstances.

4.38 When a member of staff administers medication, it should be strictly controlled and documented. Every time that it is administered, a record should be made. Children and young people with longer-term medical needs should have a health care plan, a copy of which will be requested from parents, guardians or carers, and sent with the consent form. It is important to obtain sufficient information about the child’s needs. Directors of programmes need to know, and share with the appropriate people, the following information:

- the details of the condition;
- any special requirements e.g. precautions to be taken before specific activities;
- the medication and any side effects;
- the action to take in an emergency, through a personal emergency plan

4.39 Safety procedures must be in place for storage and safe administration of medicines. The following are important points:
do not store large quantities of medication
any that are stored must be labelled with the participant’s name, the name and doses of the drug and how often it needs administering
each drug should be stored in a separate container
staff should check the name and information on the medicine and match it to the child’s details on the consent form before giving them the medication
check that the medication has not exceeded the ‘use by’ date before each administration

4.40 Although it is important to keep the majority of medicines locked away, some need to be more readily available to the child or young person, for instance inhalers for asthma. They must not be available to others.

4.41 It is necessary for an appropriate risk assessment to be in place, and arrangements for supervision by an appropriately qualified specialist if this is necessary.

Minibus

4.42 The use of minibuses for minors raises no issues that are not applicable where adults are taken in such vehicles. However, its use should be included as part of the risk assessment.

4.43 Where use is made of a University minibus, the director of the programme or activity is to make application to the Security and Transport Manager.

Sources of Information

(a) University Information

Health and Safety

Reporting of Accidents, Incidents and Near Misses

Risk Assessments
(b) External Information

Department for Schools

*Health and safety: Advice for schools*

*First Aid in Schools*

Health and Safety Executive (HSE)

*School trips and outdoor learning activities: Tackling the health and safety myths*
SECTION FIVE
INSURANCE

5.1 This section is of concern to those responsible for the organization of any activity that involves children and young people, including Heads of school/department and directors of programmes or activities. It needs reading as a whole, although some sections are more specific in their orientation.

5.2 In planning and organising any activity that involves children and young people, it is important not to assume that full insurance cover is automatically in place. For this reason, it is necessary to provide the University’s Insurance Adviser with detailed information.

Roles and Responsibilities

5.3 The Insurance Officer is responsible for all matters relating to University insurance, including activities involving children and young people.

5.4 The director of the programme or activity is responsible for notifying the Insurance Adviser of all activities taking place, with the exception of students under 18 years of age on University award bearing programmes.

5.5 Directors of programmes or activities should ideally give as much notice as possible to Insurance Adviser with full details of intended activities (including any off-Campus) so that appropriate levels of cover can be confirmed before activity starts. If this involves additional premiums, Directors of Programmes will be informed and may be recharged appropriate costs. The University Insurance Adviser will report any areas of risk insurers decline to cover, immediately, so that Senior Management Team member(s) can make appropriate decisions.

Insurance Cover

5.6 The University insurance cover portfolio includes:

(a) **Employer’s Liability** policy to cover liabilities arising from accidents suffered by staff, apprentices or volunteers, including children and young people, whether or not caused by them. There are no age restrictions or limitations

(b) The **Material Damage** policy covers vandalism and malicious or accidental damage caused by individuals, including children and young people to University property. This is subject to normal University insurance policy excesses.

(c) The **Public Liability** policy covers any injuries or damage to the property of third parties including that caused by children and young people when under the University’s control, or to children and young people by the University.
5.7 Any new programmes or activities involving children or young people the University undertakes need declaring to insurers as this may result in an additional premium.

**Information Required by Insurers**

5.8 The following information would generally be required by insurers for under 18 activities with the University

(i) Number, age and sex of under 18s

(ii) Indication of any disabilities

(iii) Confirmation of Parental/Guardian consent

(iv) Risk assessments of proposed activities (on and off campus); duration of time with University; any accommodation provision. Please see section on Health & Safety concerning supervision.

5.9 The University does not insure individual personal possessions and will only consider claims for damage/loss caused by the University. Parents & Guardians should be advised by Directors of Programmes so they can ensure that their personal contents insurance cover extends to possessions and valuables (including musical instruments) for their under 18s whilst they are with the University.

**Notification of Claims**

5.10 The University should notify the insurers of all claims and potential claims, relating to under 18s under University control.

5.11 Directors of programmes and activities must notify the Insurance Adviser of any potential claim as soon as is reasonably practicable. Claims should be directed to the Insurance Adviser immediately, background information for both should include:

- the name of the child or young person
- the name (and approx age) of any person who was a witness
- the nature of the loss, damage or accident
- the circumstance of the loss, damage or accident
- the time, date and place the loss, damage or accident took place

5.12 Where there is an accident/injury involving a child or young person as well as advising the Insurance Adviser, it is vital to complete, and to forward urgently to the University Health and Safety Manager [a completed accident report form](#). The Health and Safety Manager may conduct an independent investigation into the accident.

**Employing Young People**

5.13 The Employer’s Liability policy is written to include children and young people working for the University.
5.14 Human Resources and Organisational Development monitor the extent of the University’s employment (whether paid or not) of children and young people, and periodically inform the Insurance Adviser.

**Young Students**

5.15 The University’s exposure to claims for injury or loss to any young person registered as a student on a programme due to University actions, property or equipment is covered under the University’s Public Liability Insurance cover any claims should be referred to the University’s Insurance Adviser.

5.16 In the unlikely event that a child or young person registered as a student is involved in work experience outside the University with a host employer, the Programme Director should ensure the host’s Employer’s & Public Liability extends to cover the student. If there are any issues, the Programme Director should contact the University’s Insurance Adviser.

**Summer Schools**

5.17 The University’s liability for injury to Summer School visitors, including under 18’s or damage to their property caused by University staff, property or equipment is included under the University’s Public Liability cover. If Summer School activities are held off Campus at recognised establishments (such as outward-bound centres/museums) then during such time the establishments own Public Liability Insurance will cover their visitors including under 18’s. Directors of Programmes or Activities are asked to advise the Insurance Adviser with relevant details prior to the start of the Summer School so that University’s insurers can be put on notice.

5.18 In the briefing for parents, guardians and carers, it should be made clear that the University cannot be held responsible for the loss of any personal belongings or valuables not caused by the University and that these should be covered as an extension of the parents, guardians and carers own contents insurance policies.

5.19 Where there is a summer school that entails taking the participants on a trip within the UK away from the campus especially if overnight, it would be advisable for the originating school or college to take out a group (schools) travel policy or for parents, guardians or carers to make suitable travel insurance arrangements. The University’s business travel insurance scheme does not currently extend to any students. Summer Schools originating from abroad, should have their own travel insurance and the Director of Programme or activity should satisfy themselves this is in place.
**Visits outside the UK**

5.20 If summer school participants are being taken to another country in the European Union, it is essential to gain specific consent from the parent, guardian or carer. In addition, a [European Health Insurance Card](#) should be obtained for each individual by originating school, parent, guardian or carer as should an appropriate policy of travel insurance; this cannot be supplied by the University. Similar arrangements regarding travel insurance cover should be made if travel anticipated to countries outside the EU. In all instances [Foreign and Commonwealth Office advice](#) regarding such matters as vaccinations should be followed.

**Research Projects**

5.21 The University has to specify to its insurers any new or altered Research projects, to ascertain if insurance protection remains appropriate. Currently the cover under Public Liability Insurance arrangements does not cover clinical trials. Should any proposed research involve Children or Young people, the appropriate Director of programme or activity should advise the Insurance Adviser at the earliest opportunity, including details of insurances held by any external partner involved in such research.

5.22 Any extensions required to University's existing insurance cover may result in additional premiums that may be recharged to the appropriate department. The University's Insurance Adviser is able to provide specific advice.

5.23 Reference should be made to the University’s policy on [Research Governance and Ethics](#).

**Sources of Information**

(a) University Information

[Insurance web pages](#)
SECTION SIX
ORGANIZING FORMAL ACTIVITIES FOR CHILDREN AND YOUNG PEOPLE
AT THE UNIVERSITY

A GUIDE FOR DIRECTORS OF PROGRAMMES AND ACTIVITIES

6.1 When a department arranges activities for groups of children and young people at the University, including any of its campuses and buildings, the Head of school/department, relevant manager or officer of the Students’ Union must ensure compliance with the relevant sections of this policy.

6.2 Heads of school/department should ensure that the relevant personnel engage in early planning of activities to ensure appropriate contact with the appropriate officers of the University. In particular, it should be noted that it may take up to three months to complete the process where there is a need to recruit, interview, acquire references and satisfactory checks of employment, and DBS clearance of employees and volunteers.

6.3 An example of a set of Protocols setting out the requirements for the organizing, booking and running of activities for schools and details the responsibilities of all parties produced by Aimhigher appears at the end of this section.

*Director of Programme or Activity*

6.4 A key appointment is the director of the programme or activity, who will have specific responsibilities detailed in the various sections of this policy.

6.5 The director of the programme or activity is responsible for:

(i) the safety of the children and young people while in their care;

(ii) establishing and implementing health and safety systems to ensure the children and young people are in a safe environment at all times when on University premises;

(iii) gaining the appropriate consents from parents, guardians and carers (for instance relating to medication (section 5) and photographs (section 14));

(iv) producing a suitable and sufficient written risk assessment, including risks, hazards and appropriate control measures;

(v) confirming that there is sufficient insurance cover for the activities;

(vi) ensuring that the children and young people have sufficient supervision for the duration of the visit, provided by suitably qualified supervisors.
Contact with the child or young person and their family

6.6 When arranging a programme or activity, it is important to consider the nature of the contact making with the participants and the families before the commencement of the programme or activity. The following are important issues that need consideration, although the nature of each will vary according to the programme or activity:

(a) the application form
(b) the parental consent form
(c) medical details, and parental consent forms relating to medication
(d) any special dietary requirements

6.7 It is important to be clear what the child or young person is to bring, and, perhaps more significantly, what is not to be brought.

6.8 Families should receive relevant details of the programme and the arrangements for contacting the director of the programme or activity in an emergency. The protocols for early withdrawal need consideration.

Handover or Reception Point

6.9 Where a child or young person will be remaining unaccompanied on University premises, there is a need for a clearly defined handover or reception point. It is at this point that the University’s duty of care begins.

Orientation and Support

6.10 It is important to consider the orientation and induction arrangements. This includes outlining the support arrangements in place.

6.11 Consideration should be given to preparing an information pack, including relevant maps and plans, contact names and numbers and roles of adults, ‘frequently asked questions’, outline programmes, arrangements relating to fire and evacuation, and expected conduct.

6.12 It is useful to talk through the planned activities at an orientation session to address any fears and concerns.

Code of Conduct

6.13 Where the activity or programme requires a residential element or sustained contact with the University, there should be a Code of Conduct. The form of the Code depends on the nature of the programme or activity.

6.14 The Code of Conduct sets out what is expected, and what is unacceptable behaviour. It is essential the child or young person signs a copy once the Code has been explained and any questions addressed. The child or young person should receive a copy of the Code. The child or young person should not commence the programme or activity until the Code is signed.
6.15 There should also be a code of conduct when a child or young person is undertaking work experience (see Section 8).

6.16 An example of a code of conduct from a Higher Education Summer Camp appears at the end of this section.

**Removal from a Programme or Activity**

6.17 As a last resort, it may be necessary to remove the child or young person from the programme or activity for serious misbehaviour. Any Code of Conduct should cover this eventuality.

6.18 Removal from University premises can only take place when arrangements are in place for the supervised collection of the child or young person. If such collection is not possible, the child or young person needs escorting home by a suitable support worker.

6.19 Once there is a decision for removal, the child or young person must remain under close supervision until the handover is complete.

**Accommodation for Residential Programmes or Activities**

6.20 The following points need checking:

(i) separation of male and female sleeping and bathroom facilities for children and young people, and adults
(ii) suitability of employees and volunteers for working with children and young people
(iii) safety of the accommodation
(iv) appropriateness of accommodation for those with disabilities
(v) night time supervision arrangements

**Procedures in the Event of Emergency or Accident**

6.21 The following points need checking, in conjunction with the points outlined in Section Four:

(i) the emergency and evacuation procedures
(ii) the arrangements for reporting and investigation of accidents, incidents and near misses
(iii) the arrangements for when someone is injured or taken ill
(iv) the arrangements for dealing with any child or young person who has specific medical needs, including medication
(v) the arrangements for the storage of any medicines

**Insurance and Health and Safety**

6.22 The following points need checking, in conjunction with the points outlined in Sections Four and Five:

(i) the production of risk assessments for activities both on and off campus
the arrangements for the chaperoning of the participants
(iii) the insurance arrangements for activities both on and off campus
(iv) the safe storage of personal possessions
(v) the arrangements for the identification of participants and adults (e.g. name badges, sweatshirts), together with visitors

Supervision

6.23 The following points need checking:

(i) the exercise of control and supervision outside the classroom arena, particularly in relation to:
   (a) breaks between sessions
   (b) lunchtime
   (c) walking between buildings (and sites) unsupervised
   (d) the responsibility when travelling to and from the University

(ii) the arrangements for recording attendance
(iii) the procedures when a child or young person is absent from a class or activity

Data Protection

6.24 Data protection provisions require owing the duty of confidentiality to the child or young person, and not the parents, guardians or carers. A director of a programme and activity should generally obtain the consent of the child or young person before releasing information to a parent or other third party.

6.25 A director of a programme or activity may consider it prudent to obtain consent from all the participants for the release of specific data to specified third parties.

6.26 A director can obtain advice from the University Data Protection Officer.

Training and Induction of Staff and Volunteers

6.27 A director of a programme or activity must make appropriate arrangement for the training and induction of staff and volunteers.

6.28 The nature of the training will vary according to the programme or activity and the characteristics of the staff and volunteers. Matters that might be included are:

(i) issues covered by the Safeguarding Policy and Code of Practice
(ii) health and safety
(iii) how to deal with conflict, illness and accidents
(iv) fire and evacuation procedures
(v) dealing with breaches of security
(vi) operating the Code of Conduct
Variation in Teaching Strategies

6.29 Where members of the University staff are teaching those under the age of 18, they may need to be sensitive to any particular needs or difficulties such students may have. It should be recognised that teaching style and content should be designed to meet the expectations of younger people. What is acceptable for a nineteen-year-old student may not be entirely satisfactory for a sixteen year old.

Sources of Information

(a) University Information

(b) External Information

Information Commissioner’ Office

Exam Results Disclosure by Schools
AGREED PROTOCOL FOR SCHOOLS ACTIVITIES

This protocol outlines the requirements for the organising, booking and running of activities for schools and details the responsibilities of all parties; Aimhigher Kent and Medway (AHKM), partner Higher Education Institutions (HEIs), partner Further Education Colleges (FECs) and partner schools. It has been written by the AHKM Operations Group.

While all AHKM partners will sign their agreement to this protocol, this in no way overrides alternative agreements that might be made between individual partners. The aim is always to secure the most efficient means of delivery and high quality activity.

1. General organisation

1.1 Organisation of schools activities timetable

a) Activity providers will send information on activities planned for each academic year to the Aimhigher Schools Manager of each funded local authority and the AHKM Research and Evaluation Manager. The deadline for receipt of this information has been agreed by all parties to be the 30th September of the academic year concerned.

b) Activity providers will be responsible for ensuring that the dates and timings of events that they organise take account of school and FEC term and exam dates. It is important to note differences between school and FEC dates in relation to this.

1.2 Booking events

1.2.1 General

a) All partners agree that full-time staff will respond to phone messages within 48 hours. It is, however, acknowledged that some part-time staff are unable to do this. In the event of a designated contact being unavailable for more than 48 hours, all partners will ensure that there are telephone and email answering services directing contacts to immediate assistance.

b) The AHKM Administration Officer will keep a list of all activity provider contacts.

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1 The term ‘activity provider’ denotes any institution hosting a schools activity.
It is the responsibility of HEIs, FECs and Local Authorities to advise the AHKM Core Team of any changes to designated contacts in any sectors.

1.2.2 Attending schools/FECs

a) Attending schools/FECs will provide a named contact who will receive and process all schools activities correspondence.

1.2.3 Activity providers

a) Activity providers will provide a named contact who will receive and process all schools activities correspondence.

b) Activity providers agree that they are responsible for ensuring that their list of schools activities is current and any updates (e.g. new activities offered, activities withdrawn) are communicated to AHKM partner schools/FECs promptly.

1.3 Cancelling events

a) Attending schools/FECs will inform activity providers in writing at least ten working days prior to the event start date should they need to cancel the attendance of any or all of their students booked on the event. This will enable activity providers to recruit target students from alternative schools/FECs to fill places available.

b) If schools/FECs cancel at short notice, activity providers cannot guarantee the availability of places for students from these schools/FECs on future events organised by the activity provider.

2. Communication

2.1 Pre-event communication

2.1.1 Attending schools/FECs

a) Attending schools/FECs agree that they will provide activity providers with the following information at least two weeks prior to an event:

- The year group attending
- Ages of students attending
- Number of attending students
- The subjects being studied by the attending students
- What the students and teachers expect from the day
- Any special requirements for attending students and teachers (e.g. disabilities, allergies, dietary requirements)

b) Attending schools/FECs agree that they will pass any necessary information on individual students to activity providers as soon as it is available and prior to the event. Last minute information has implications for insurance for all parties and is therefore unacceptable. This does not preclude individual arrangements between participating institutions.
c) Attending schools/FECs agree that they will disseminate information to students and parents as appropriate.

2.1.2 Activity providers

a) Activity providers agree that they will provide attending schools/FECs with generic information at the time of booking events. Details of individual events and specific information will be agreed amongst all parties and sent to the attending school/FEC a minimum of two weeks prior to the event. The information must include:

- Risk assessment form
- A detailed itinerary for the day (see item f) below)
- Information on which students the event is suitable for
- A code of conduct (see item 3 below)
- First aid information
- Dress code
- Arrangements for the preparation of invoices, where applicable
- Activity provider contact details

b) Activity providers agree that they will include the following information within the itinerary:

- The arrival meeting point and time, including the coach drop-off/pick up point
- The timing of individual activities
- The timing and location of lunch and breaks
- What to do if a student becomes separated from the group
- The university code of conduct

2.2 Transport

a) Attending schools/FECs are responsible for arranging the transport of student to and from events, unless otherwise agreed between participating partners.

b) Attending schools/FECs agree that they are responsible for ensuring that the appropriate insurance for the transportation of students is in place.

c) Attending schools/FECs will invoice event providers for transport costs. Activity providers will provide schools/FECs with a list of approved suppliers if relevant.

2.3 Feedback

a) Attending schools/FECs are required to ensure that agreed feedback is returned to the activity provider’s named contact within one week of the event, according to the requirements of the AHKM Research and Evaluation Manager.
b) Activity providers are responsible for feeding back to the school/FEC’s named contact on any student behavioural issues on the same or next day.

Code of Conduct

3.1 Activity providers

a) Activity providers will provide a code of conduct, specific to school/FEC students visiting for activities. This will include behaviour during travel to and from the institution.

b) Activity providers must send the code of conduct to the school/FEC prior to each event. This must clearly state the following as a minimum:

• Attending schools/FECs must comply with DCSF guidelines on staff to student ratio
• School staff are fully responsible for their students and will be present at the event at all times
• School/FEC staff will discipline their students if necessary
• Activity provider staff have the right to deal with disciplinary issues if school/FEC staff have not dealt with them adequately, or when school/FEC staff are not able to be with the students for certain periods during the day

c) Activity providers agree that they will outline the policy again with the students at the start of the event day.

3.2 Attending schools/FECs

a) Attending schools/FECs agree to ensure that the code of conduct is properly understood by attending staff and students, and agree to sign and return the policy prior to the event.

4. The Event Day

4.1 Logistics

4.1.1 General

a) Attending schools/FECs and activity providers agree to meet each other at a prearranged time and location.

4.1.2 Activity providers

a) Activity providers agree that they will organise refreshments and comfort breaks throughout the day.

b) Activity providers agree that they will advise on general housekeeping at the start of the day.

4.2 Lecturers
a) Activity providers agree that all personnel who work with visiting students on the day will be DBS checked and suitably prepared for the event.

Activity providers agree that they will provide contributing lecturers and other staff with information on the age, type, and expectations of attending students in adequate time

b) before the event. The quality of this information will be contingent upon attending schools/FECs properly following the procedures detailed in point 2.1.1 a).

c) Activity provider staff delivering activities to students must be able to:

- Communicate effectively with a younger audience
- Liaise with school staff to agree on the appropriate level for the lecture
- Keep lectures generic unless a subject-specific lecture has been requested
- Keep to agreed times

4.3 Talks

a) Activity providers agree that they will ensure that activities (including lectures):

- Are planned in advance with clear aims and objectives which should be outlined to the school ahead of the day
- Involve interaction with students
- Are aspiration raising
- Are short enough to keep students’ attention (max 20-30 minutes for formal lectures)
- Are tailored for specific age groups
- Are stretching but not beyond the students’ level
- Meet national curriculum needs where possible
- Involve ambassadors and student mentors where appropriate
- Involve electronic visual aids where possible
- Offer a question and answer session if appropriate

I hereby agree on behalf of (insert institution name) to abide by the terms and conditions outlined in the above protocol.

Signature:…………………………………………………………………
Name: ………………………………………………………………………
Position: ………………………………………………………………………
Date:……………………………………………………………………
HIGHER EDUCATION SUMMER CAMP

CODE OF CONDUCT

For:

PRINT NAME

You must read this **Code**, and **you and your parent or carer must sign** in the box overleaf if you intend participating in the Higher Education Summer Camp at Canterbury Christ Church University.

1.1 **Expected behaviour**
Participating in this Summer Camp course for a week will be very different from your experiences at school. The Summer Camp is designed so that you, and all the other students attending, may benefit from the course and enjoy this new experience. In order to do this, you will be expected to show responsible behaviour while attending the Summer Camp. You must also respect the rights of other students and Summer Camp staff, as well as university property.

1.2 **Rules and regulations**
For health and safety reasons, and for **all** students to have the opportunity to benefit and enjoy the Summer Camp, the following rules and regulations will be in operation.

- You must not bring alcohol onto the Summer Camp site, nor must alcohol be consumed at any time during the week of the Summer Camp.
- The purchase or use of any illegal substances is strictly forbidden.
- Smoking is allowed only if you are aged 18, and only in certain designated areas, which will be indicated on the first day of the Summer Camp.
- You are expected to attend all timetabled activities unless there is a valid reason for absence, such as illness.
- You must not leave the Summer Camp site without permission from appropriate Summer Camp staff nor, on supervised visits, must you wander away from the group and the leader.
- You are expected to follow any emergency procedure, such as a fire drill, as directed by Summer Camp staff.
- There will be separate male and female accommodation. You must keep to your own house / dormitory, and not enter any others in the Halls of Residence.
- You are expected to be in your room at specified times; these will be indicated on the first day.

**Serious incidents of misbehaviour**
In the event of you being involved in serious incidents of misbehaviour, such as fighting, racial abuse or the use of illegal substances, you will not be allowed to continue on the Summer Camp and arrangements will be made for you to be collected by your parent or carer and taken home.
1.3 First day of Summer Camp
On the first day of the Summer Camp, or when undertaking specific activities, staff will explain any additional rules and regulations that will apply to activities you will be choosing. It is expected that you will adhere to them for your own health and safety, and that of other students and staff.

DECLARATION
I have read the information presented in this Code of Conduct and agree to adhere to the rules and regulations listed.

I also agree to adhere to any additional rules and regulations explained to me on the first day of the Summer Camp, and when undertaking specific activities.

I understand that I will not be allowed to continue on the Summer Camp course in the event of serious misbehaviour on my part.

SIGNATURE OF STUDENT:___________________________________________
DATE: ____________________________

I, __________________________________________(Print name of Parent / Carer) understand the expectations that have been agreed above.

I agree that a designated member of the Summer Camp may supervise the medication my child has to take (if appropriate; please give full details on pink medical form).

I undertake to collect my child without delay if s/he contravenes this agreement.

SIGNATURE OF PARENT/GUARDIAN: _________________________________

I am the □ Mother □ Father □ Guardian
DATE: ____________________________

PLEASE RETURN THIS COMPLETED FORM TO: [NAME, POSITION AND ADDRESS]
SECTION SEVEN

DISCLOSURE AND BARRING SERVICE

7.1 There are requirements in relation to the appointment of those who supervise and have substantial regular, unsupervised contact with children and young people. Certain staff across the University will be in regular or significant occasional contact with under-18s or vulnerable adults in the course of their teaching or other work, or will be in positions of particular trust. Many students are required to work or undertake placements that bring them into contact with under-18s or vulnerable adults.

7.2 The University maintains robust recruitment practices and take steps to ensure that it complies with the requirements of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012. This will include Disclosure and Barring Service (DBS) checks for staff and students required to work with under-18s or vulnerable groups in regulated activities. The University is committed to ensuring that relevant staff and students have appropriate checks in accordance with accepted practice to ensure their suitability to work with under-18s and vulnerable adults.

7.3 The University undertakes checks on both students who have access to the young and vulnerable on placements (which is the responsibility of the Director of Admissions and on staff (which is the responsibility of the Director of Human Resources and Organisational Development). This section concerns only staff.

7.4 The regime is in the process of development with the introduction of the Disclosure and Baring Service (DBS), which became operational in September 2012.

7.5 There are important duties placed on the University, which include:

(i) The University must not knowingly allow a barred individual to engage in a regulated activity

(ii) The University must refer certain information to the DBS where permission is withdrawn for the individual to engage in regulated activity or would or might have done so had the individual not ceased the activity. There is DBS Guidance on Referrals.

(iii) There is an increasing emphasis placed on ensuring there is a safeguarding regime within organisations. The oft-quoted example is the person who represents a threat and does not appear in any official record. To this end, DBS checking is not a substitute for ensuring relevant employees and students are appropriately recruited, trained and managed. Day-to-day management is essential in identifying the early identification of unusual or concerning behaviour and talking appropriate action.
7.6 The General Counsel, as the lead DBS Signatory, undertakes the reporting to the DBS. The Assistant University Secretary provides executive support for this process. Where there is a need to consider whether a referral should be made, the relevant head of school/department must inform immediately the Dean of Faculty (for students) or the Director of Human Resources and Organisational Development (for staff), who will liaise with the Assistant University Secretary.

**Regulated Activity**

7.7 Regulated activity is defined as work which an individual who is barred from working with vulnerable groups including children must not do.

7.8 The current definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

7.8.1 unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children

7.8.2 work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children’s homes, childcare premises. Not work by supervised volunteers;

    Note: Work covered by the above two sub-paragraphs is regulated activity only if done regularly (see below).

7.8.3 relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional

7.8.4 registered childminding; and foster-carers

7.9 The term ‘regularly’ carries its ordinary meaning as used in common parlance. Regularly could be used to describe the duties that a person carries out everyday but not all day; every week but not on every day; every month but only once a month. In this context, regulated activities are those that involve contact with children carried out frequently (at least once a month), intensively (on 3 or more days in any 30 day period) or overnight.

**Checks with the Disclosure and Barring Service**

7.10 The Disclosure and Barring Service (DBS) enables employers to request information on those who are to work, whether paid or voluntary, with children and young people. Information provided includes ‘spent’ convictions under the Rehabilitation of Offenders Act 1974.

7.11 The University has registered with the DBS and as a condition of registration has in place the required policies on the recruitment of ex-offenders, together with the secure storage, handling, use, retention and disposal of disclosures and disclosure information. There are also procedures for determining the process when a disclosure reveals a criminal offence. These policies are available on application to the Director of Human Resources and
Organisational Development. There is a requirement to meet the requirements of the DBS code of practice.

7.12 Those responsible for recruitment, both of members of staff and volunteers, should be aware when disclosures need obtaining and what level of disclosure is appropriate.

Types of Check

7.13 There are three types of check:

7.13.1 The standard disclosure covers spent and unspent convictions and reveals whether the individual is barred from working with children. Standard disclosure is available in respect of positions and professions within the terms of the Exceptions Order under the Rehabilitation of Offenders Act 1974.

7.13.2 The enhanced disclosure covers all spent and unspent convictions and other non-conviction information from local police records that a chief police officer thinks may be relevant in connection with the matter in question. Enhanced disclosure is available to a subset of those included in the Exceptions Order, in particular those who are involved in regularly caring for, training, supervising or being in sole charge of those aged under 18 or vulnerable adults.

7.13.3 Enhanced checks with a check against the children and/or the adults barred list(s): This includes all that an Enhanced check does, plus a check of the appropriate DBS Barred List. There are two DBS Barred Lists: one for adults, and one for children. The lists contain information on whether the applicant is barred from working with either of the two groups. An individual may only be checked against one or both barred lists if their job role is classified as a 'Regulated Activity' with children and/or adults.

Requesting disclosures

7.14 A disclosure should be requested when a member of staff or volunteer has regular contact with children or vulnerable adults.

7.15 Human Resources and Organisational Development makes checks with DBS for staff and volunteers. The director of a programme or activity must not apply for any checks.

7.16 It is important for a director of a programme or activity to notify Human Resources and Organisational Development of the need for requesting such checks at the earliest possible opportunity. This is particularly important since there can be a substantial delay on the part of DBS, particularly if there is a query on the information provided on the form.
**Applicant-only certification**

7.17 DBS certificates are issued to applicants only, rather than a duplicate also being sent to the University.

7.18 There needs to be an effective means of undertaking the necessary checks. These will need aligning with the procedures for safer recruitment and monitoring.

**Portability of DBS checks between employers when individual is in the same role**

7.19 There is an [Update Service] which allows individuals (if they choose to subscribe to it and pay the requisite fee) to apply for a criminal record check on one occasion only. If they need a similar sort of check again, to reuse their existing certificate, with an organisation checking online to see if it is still up to date. The intention is to avoid unnecessary repeat applications.

7.20 The Update Service is accessible only after a new-style check has been undertaken. It means that any checks made before the introduction of the Update Service are not eligible.

**Sources of Information**

(a) University Information

*Policy Statement on the Use of DBS Disclosures and Job Applicants with Convictions* (Human Resources and Organisational Development)

*Recruitment (Human Resources)*

(b) External Information

Department for Schools

*Working together to safeguard children; a guide to inter-agency working to safeguard and promote the welfare of children*

*Keeping children safe in education*

Disclosure and Barring Service

Information about the DBS can be found on their [website](#).
SECTION EIGHT

WORK EXPERIENCE FOR CHILDREN AND YOUNG PEOPLE AT THE UNIVERSITY

**Health and Safety Requirements: Risk Assessments**

8.1 The University has health and safety obligations relating to children and young people on work experience additional to those for adult employees.

8.2 The Management of Health and Safety at Work Regulations 1999 require a separate risk assessment, which takes account of:

(i) the inexperience, lack of awareness of risks and immaturity of young people

(ii) the fitting out of the workstation and area of work

(iii) the nature, degree and duration of exposure to physical, biological and chemical agents

(iv) the form, range and use of work equipment, and the way in which it is handled

(v) the organization of processes and activities

(vi) the extent of the health and safety training provided or to be provided to young people

8.3 Parents, guardians and carers of children and young people under 16 years of age on work experience should receive a copy of any written risk assessment relating to the work experience.

8.4 Departments providing work experience in the University may obtain advice on the production of any risk assessment from the University Health and Safety Manager.

**Young People on Work Experience with Disabilities, Learning Difficulties or Health Related Matters**

8.5 It is particularly important that the manager or supervisor is made aware of any disabilities, learning difficulties or health related matters that a young person has to ensure members of staff are able to provide the appropriate support, and to make reasonable adjustments.

8.6 The person arranging the work experience must seek information from the school, University or other sponsor of any disability or other special requirements the child or young person has.

8.7 It is important to make clear the University reserves the right to terminate with immediate effect the work experience if this information has not been forthcoming.
**Code of Conduct**

8.8 It needs to be a condition of the work experience that all participants read and sign acceptance of a Code of Conduct. Where appropriate the member of University staff responsible for the work experience should discuss with, and explain, the content of this Code. If need arises, the Code should also be read to the young person concerned.

8.9 A copy of the Code needs to be available to the school, University or other sponsor.

**Sources of Information**

(a) University Information

Guidance for Manager and Supervisors on Employment and Work Experience for Young Workers

Briefing for Young Workers in Employment and on Work Experience: An Aide Memoire

Questions that Might be Asked When Offering Work Experience

Risk Assessment and Young Workers or Work Experience Participants

(b) External Information

**Department for Education**

*Work experience for 16- to 19-year-olds*

**Health and Safety Executive**

*Young people and work Experience*  INDG 364
SECTION NINE

EMPLYING CHILDREN AND YOUNG PEOPLE AT THE UNIVERSITY

Requirements relating to the employment of young people

9.1 There are a number of restrictions affecting the employment of children and young people. Most of the statutory restrictions relate to health and safety, working hours and training.

9.2 An employment contract for young people is one of the exceptions to the general rule that contracts with a minor are unenforceable.

Training

9.3 An employee aged 16 or 17 has a right to take time off work for study or training leading to a relevant qualification. The amount of time that may be taken is that which is reasonable, taking into account the nature of the training or study and the needs of the employer.

Working Hours

9.4 Under the Working Time Regulations 1998, young workers are entitled to:

- A health and capacities assessment before being required to perform night work, and periodically thereafter
- A minimum rest period of 12 hours in every 24 hours
- Two days off per week
- A minimum 30-minute rest break after 4½ hours of continuous work

Health and Safety

9.5 In terms of health and safety, the relevant legislation is the Management of Health and Safety at Work Regulations 1999. In this context, all those under the age of 18 are included. Before young people start work, the employer must carry out a risk assessment to include:

(i) the inexperience, lack of awareness of risks and immaturity of young people
(ii) the fitting out of the workstation and area of work
(iii) the nature, degree and duration of exposure to physical, biological and chemical agents
(iv) the form, range and use of work equipment, and the way in which it is handled
(v) the organization of processes and activities
(vi) the extent of the health and safety training provided or to be provide to young people
9.6 Employers must ensure young people are protected at work from any risks to their health or safety because of their age and inexperience, and must not be given work that is beyond their physical or psychological capacity.

Managerial Responsibility

9.7 It is the responsibility of the Head of school/department concerned to ensure the implementation of the requirements set out above, including ensuring the proper undertaking of any risk assessment.

Sources of Information

(a) University Information

Guidance for Manager and Supervisors on Employment and Work Experience for Young Workers

Briefing for Young Workers in Employment and on Work Experience: An Aide Memoire

Questions that Might be Asked When Offering Work Experience

Risk Assessment and Young Workers or Work Experience Participants

(b) External Information

Department for Schools

Guidance on the employment of children

Health and Safety Executive

The Right Start - Work experience for young people INDG 364
SECTION TEN

CONTRACTS WITH CHILDREN AND YOUNG PEOPLE

10.1 Under contract law, the general rule is that a person does not have capacity to enter into a contract unless he or she is aged 18 or over, and therefore any contract entered into would be unenforceable during the minority.

10.2 An exception to this rule is where the contract is for ‘necessaries’, which includes contracts for education and accommodation. The University, therefore, can expect to be able to enforce, without risk, a contract for tuition and accommodation.

10.3 For terms to become part of the contract with children and young people, they need incorporating into it. It is vital for the terms to be brought to the attention of the applicant BEFORE the offer of a place is made. In essence, any terms must be fair and reasonable.

10.4 There may be other contracts falling outside the definition of ‘necessaries’.

10.5 Even where a contract is for ‘necessaries’, and therefore enforceable, the child or young person may have no assets with which to pay damages or otherwise meet the terms of a judgment, so the risk of having to write off a debt due from a minor needs to be taken into account.

10.6 It would be prudent for the relevant Head of school/department (e.g. Accommodation Manager) to obtain a guarantee in advance from the parent, guardian or carer of the child or young person for any fee or charge. This needs outlining in advance in a letter sent to the parent, guardian or carer. This may also extend to including a parallel agreement with the parent of a child covering matters such as attendance and discipline. What is important is to manage the expectation that parents have relating to the information provided about the child BEFORE the commencement of the programme.

10.7 Further advice on matters relating to billing arrangements is obtainable from the Director of Finance.
SECTION ELEVEN

COMPLAINTS MADE BY CHILDREN AND YOUNG PEOPLE, INCLUDING STUDENTS UNDER THE AGE OF 18

11.1 The University Student Complaints Procedure should be followed for all complaints.

11.2 The Complaints procedure for those under 18 is amended as follows:

“If a complaint is made under the University Student Complaints Procedure by a child or young person, the University will notify the parents, guardians or carer in writing, and keep them informed of the progress of the complaint, unless it is the express wish of the child or young person that this should not be done.

The University will permit the parents, guardians or carers to act on behalf of the child or young person during the process, provided the child or young person is able to understand the nature of the process and confirms agreement in writing beforehand.

The child or young person will be informed of this process at the time of making the complaint, and asked whether the University is to keep the parent or guardian informed.”

11.3 As a child approaches maturity, so the duties of the parent, guardian or carer diminish. This is why the key question to ask in relation to any child is what understanding and maturity the child has. There can be no doubt that a child who has such sufficient understanding may give a valid consent to the use of confidential information relating to him or her. It is also clear a child has rights in the law of confidentiality (and under Article 8 of the European Convention on Human Rights), and that it is accordingly necessary to respect those rights.
SECTION TWELVE

CHILDREN AND YOUNG PEOPLE AS RESEARCH PARTICIPANTS

12.1 Where children or young people are research participants, for example, in the educational, health or social sciences areas, difficult issues may arise.

12.2 It is vital to refer to the University policies relating to research ethics at the earliest stage. The reason for including reference to research in this policy is to indicate the issues that need addressing.

12.3 Researchers need to consider the following issues:

- Informed consent
- Safeguarding
- Ethics approval
- Good practice in the design and implementation of the project
- Management Information
- Insurance

Informed consent

12.4 The first question to ask is who may give consent. Generally, as a matter of principle, if a child has sufficient understanding and intelligence to understand to what it is he or she is consenting, then the child is able to give a valid consent. A parent’s power to give a valid consent to actions that would otherwise involve a trespass to the person in relation to a child is derived from a parent’s duty to take care of the child.

12.5 As a child approaches maturity, so the duties of the parent, guardian or carer and therefore powers in relation to the child, diminish. This is why the key question to ask in relation to any child is what understanding and intelligence the child has. There can be no doubt that a child who has such sufficient understanding and intelligence may give a valid consent to the use of confidential information relating to him or her. It is also clear that a child has rights in the law of confidentiality (and under Article 8 of the European Convention on Human Rights), and that it is accordingly necessary to honour those rights in this situation.

12.6 The British Sociological Association gives the following advice:

"Research involving children requires particular care. The consent of the child should be sought in addition to that of the parent. Researchers should use their skills to provide information that could be understood by the child, and their judgement to decide on the child’s capacity to understand what is being proposed. Specialist advice and expertise should be sought where relevant. Researchers should have regard for issues of Safeguarding and make provision for the potential disclosure of abuse."
Good practice in the design and implementation of the project

12.7 As well as addressing ethical issues and good research practice, the researcher should demonstrate that consideration has been given to safeguarding issues, ethics approval, data protection, and insurance matters.

Safeguarding

12.8 Any research by any member of staff or student of the University is governed by the University Code of Practice (Section 1), together with the relevant sections of the University Policy on Under 18s.

Ethics approval

12.9 It is important when considering any research involving children and young people to ensure that appropriate ethical approval is obtained in accordance with the University arrangements for obtaining ethical consent in those situations.

12.10 The process for obtaining ethical approval is set out in a flow chart available as part of the Research Governance and Ethics arrangements at: http://www.canterbury.ac.uk/research/governance/documents/ethics%20flowchart.pdf

Data Protection

12.11 The researcher should have in place procedures, which are regularly monitored, for the safe storage of research data, to include both paper and electronic material.

12.12 The procedures should include the disposal of material when it is no longer required and the safe disposal of computers used for storing sensitive material.

12.13 The Information Commissioner has ruled that failure to have such procedures may breach the Data Protection Act 1998.

Insurance

12.14 Please see section 5 of this policy concerning Insurance particularly subsection regarding research

Sources of Information

(a) University Information

Research Governance and Ethics
(b) External Information

British Psychological Society

*Ethical Guidelines and Support for Psychologists*

British Sociological Association

*Statement of ethical practice*

National Children’s Bureau

*Guidelines for Research*

Department for Schools

*Safeguarding children research*

*Social work and child protection: research priorities and questions*
SECTION THIRTEEN

GUIDANCE RELATING TO CHILDREN AND YOUNG PEOPLE ON UNIVERSITY SITES OTHER THAN FOR UNIVERSITY PROGRAMMES AND ACTIVITIES AND EVENTS BOOKED THROUGH HOSPITALITY SERVICES

13.1 This guidance relates to children and young people on University property when they are not part of (i) a University organised events specifically organised from them or (ii) an event booked through the relevant hospitality services department where arrangements are put in place for the safeguarding of children and young people.

13.2 The guidance relates to situations where children and young people visit on a casual basis, including for demonstration purposes as part of a programme of study.

13.3 While children and young people, both invited and uninvited, cannot be excluded from the University, its buildings or grounds, their presence is not encouraged. Within the Student Handbook, there is a request that students do not bring children to the University and similar advice is given to staff via their Head of school/department and this guidance.

13.4 It is recognised the nature of the University and its work attracts people with childcare responsibilities. However, it is in everyone’s interests - including the children themselves - that no child is placed in a potentially dangerous or inappropriate situation.

13.5 The implications for the University of children in classes and in other areas are wide ranging - from insurance, through health and safety, to assertions made by failing students that their programmes were interrupted or compromised by the presence of children within teaching areas.

13.6 On occasions, children visit the University as a part of the learning experience for University students. In these cases, those initiating such arrangements must undertake a sufficient risk assessment in relation to the significant risks involved, supported by written procedures outlining how to reduce those risks to the lowest level possible. Such risk assessment should include:

- level of supervision
- emergency procedures
- suitability of teaching rooms, equipment etc.

13.7 Notwithstanding the advice of the University given in recent years, there is a growing awareness that the numbers of children on site are increasing, including children taken into lectures. This gives cause for concern. Previous advice offered to heads of academic departments suggested that, although half term weeks are normal teaching weeks for the University, it would be prudent to arrange teaching programmes to take account of half terms where this would be appropriate.

13.8 Where an adult brings a child to the site, for whatever reason, then the responsibility for appropriate supervision rests with that adult.
13.9 Heads of school/department should make all practical arrangements to reduce to a minimum the number of children on University premises, and emphasise the need for appropriate supervision when children are on the premises.

13.10 To avoid ambiguity, the children of staff members are regarded in the same way as the children of students and visitors.
SECTION 14 PHOTOGRAPHS, VIDEOS, WEBSITES AND WEBCAMS

Introduction

14.1 In the main, photographs for University and personal use, and those that appear in the media, are a source of pleasure, pride and enhanced self-esteem for children and young people and their families.

14.2 Although digital technology has vastly increased potential misuse of photography, in the main someone they know abuses those children and young people who are victims. There is a residual risk of a child being targeted for abuse through identification by a stranger. It is possible to minimise this risk by taking reasonable steps to ensure the appropriateness of the photograph and protect the identity of the individual.

14.3 The following guidelines are based on those issued by Act Now, which is based on work undertaken by Hampshire County Council.

14.4 The guidelines seek to raise awareness of the potential dangers to children and young people, while offering practical advice that is reasonable and proportionate.

14.5 University CCTV will capture the images of children and young people. Such images are subject to a separate University policy.

Issues of Consent

14.6 The Data Protection Act 1998 affects the use of photography, since an image of a child or young person is personal data for the purpose of the Act. Consequently, it is necessary to obtain written consent from the parent, guardian or carer for any photographs or video recordings for purposes beyond the University's core educational functions where the individuals are children under 16 years of age, and from the young person themselves where the individuals are over 16 years of age.

14.7 Because media opportunities can sometimes present themselves at short notice and it is helpful to have consent confirmed/refused in readiness. Therefore, if photographs are likely to be taken during the programme or activity, it may be convenient for the director of the programme or activity to seek consent before its commencement. If the intention is to seek publicity for the programme or activity, via either the media or University publications, it is vital to obtain consent.

14.8 A signed consent form should be obtained and kept on file, covering all cases where images of children or young people may be used for publication outside the University.

14.9 Consent gained for photographs or videos may not extend to website or webcam use. Therefore, if the intended use of photographic images is for this purpose, it is important to gain specific consent, which may be obtained as part of the consent in relation to photographs or videos.
14.10 Where the child is under 16 years of age, it is important to draw the attention to the importance of ascertaining the views of the child during the process of giving consent.

14.11 The young person (or the parent, guardian or carer in the case of a child) retains the right to withdraw consent at any stage, but they need to do so in writing.

14.12 Sample consent forms are at the end of this section. There is an example of a parental consent form and an example of a form for use with young people. These may be adapted to suit the particular circumstances of the programme or event.

Planning photographs of Children and Young People

14.13 Images and details of children and young people published together present the remote possibility that people outside the University could identify, and then attempt to contact, the child or young person directly. The measures described below should minimise the risk of such unsolicited attention.

(i) Where possible, use general shots of classrooms or group activities rather than close up pictures of individuals. Consider the camera angle; photographs taken over the shoulder, or from behind are less identifiable.

(ii) Use images in suitable dress, and take care when photographing sporting activities to maintain modesty. It may be appropriate, for instance, to photograph a group in tracksuits.

(iii) Consider alternatives. For instance, could a photograph of work produced by the individual be used instead?

14.14 It is helpful, wherever possible, to include images of individuals from different ethnic backgrounds, and positive images of those with disabilities to promote the University as an inclusive community.

Identifying Children and Young People

14.15 In situations where consent is unclear, the advice is:

- If the child is named, avoid using the photograph.
- If the photograph is used, avoid naming the child.

14.16 It is advisable to:

- Use the minimum information. Ask whether it is necessary to accompany a picture with the title of the programme or activity at the University, rather than the names.
- Avoid using photograph when fully naming a child or young person in any published text, whether in the University publications, website, or in the local press.
Using Photographs of Children and Young People Supplied by a Third Party

14.17 Copyright does not apply to images for private family use. However, copyright does exist in commercial photographs and it rests with the photographer.

14.18 Copyright is a right that the photographer automatically enjoys as the creator of the work to prevent other people exploiting the work and to control how other people use it.

14.19 Before using a photograph supplied by a third party, it is important to check that the third party owns the copyright in the photograph and obtain written permission to use it. To use a photograph without the copyright owner’s permission could lead to an action for copyright infringement.

14.20 Images downloaded from the Internet are subject to copyright.

14.21 Third Parties will generally be under the same obligations as the University to obtain consent to the use and distribution of photographs. It is important to ask the third party to guarantee that all relevant consents were given and that the third party is entitled to provide the image.

Use of Images of Children and Young People by the Press

14.22 There are occasions when the press take photographs. Parents, guardians and carers, as well as the children and young people, need to be aware of the potential risks, so they can make an informed decision about whether to agree to their children being featured in the press and whether their full name should accompany the photograph.

14.23 The way the press use images is controlled through relevant industry codes of practice as well as the law. However, if appropriate it may be sensible to check politely that broadcasters and press photographers are aware of the sensitivity involved in detailed captioning, one to one interviews, and close or sports photography.

Videos

14.24 Specific consent needs obtaining before a child or young person appears in a video. Therefore, if the intended use of photographic images is for this purpose, it is important to gain specific consent, which may be obtained as part of the consent in relation to photographs.

Websites

14.25 The use of photographic images on websites is an area gives particular concern because of the potential misuse of images. With digital photography, there is the remote possibility that images could be produced, manipulated, and circulated without the family’s knowledge. There is also a risk is that children might be exploited, and a University might be criticised or face action.
14.26 It is important to take care with identification, and to respect parental views on the use of any photography of children on a website.

**Webcams**

14.27 The regulations for using webcams are similar to those for CCTV (closed-circuit television) (reference to the University policy on CCTV is given below). This means that the area in which there is use of the webcam must be well signposted and people must know that the webcam is there before they enter the area, in order to consent to being viewed in this way. Children and young people need to give consent, as well as the parents, guardians or carers of all the affected children and young people.

14.28 In gaining consent, it is important to explain why the webcam is there, the use to which the images will be put, who might want to look at the pictures and what security measures are in place to protect access.

14.29 Webcams may pose particular risks, and these need to be taken into consideration when planning activities.

**Parental Photography**

14.30 Parents, guardians and carers may take photographs or making a video recording for their own private use. This includes any University events. They may not take photographs or to make a video recording for anything other than their own personal use (e.g. with a view to selling videos of a University event) without the consent of the other parents whose children may be captured on film. Without this consent, the Data Protection Act 1998 may be breached.

**Photographs taken by Other Third Parties**

14.31 It is important to ensure that people with no connection with the University do not have any opportunity to film covertly. Members of staff and volunteers should challenge anyone they do not recognise who is using a camera or video recorder during the programme or activity.

**The Storage of Photographs**

14.32 Photographs need treating in the same way as any other data. It is important to maintain securely any photographs retained for University use, and disposed of securely when no longer required.

**Official University Photographs**

14.33 On occasions, an official photographer from outside the University may take photographs. If this is the case, it is vital to assess the validity of the photographer or agency involved, and establish what checks or vetting has been undertaken. There needs to be appropriate levels of supervision to safeguard the welfare of children and young people at all times when visitors are present on the University site.
Sources of Information

(a) University Information

CCTV Policy and Procedures

(b) External Information

BECTA

Safeguarding children online: How e-safe are your school and your learners?

NSPCC

Guidance on helping keep children and young people safe online

Press Complaints Commission

Code of Practice

Act Now

Using images of people: photographs, videos and webcams: Guidance for schools

Information Commissioner

Taking Photographs in Schools
(This Good Practice Guidance is aimed at Local Education Authorities and those working within schools, colleges and universities.)
Canterbury Christ Church University

Photography

To  (Name of the child’s parent or guardian)

Name of child:

This letter explains why we need to ask you for your consent to any photographs of your child while on the programme at the University. When you have read the letter, you should fill in and return the form attached to let us know your wishes.

Generally, photographs for University and family use, and those that appear in the press, are a source of pleasure and pride, which we believe can enhance self-esteem for children and young people, and their families, and so are to be welcomed.

However, we live in an age in which digital technology has vastly increased the use, and potential misuse, of photography, and there has been publicity concerning the risk of a child or young person being identified by a photograph in the local press, and as a result being targeted for abuse.

The University takes the view that the risk of a child being identified by a stranger is small providing reasonable steps are in place in terms of the appropriateness of the photography and to protect the full name and contact details of children, photography will be permitted.

The University is mindful of the fact that for some families, there may be reasons why a child’s identification is a matter of particular anxiety. If you have special circumstances, now or at any time in the future, that would affect or change your consent on this issue, you need to let the director of the programme know.

You should discuss the matter of photographs with your child, and agree with them about the categories of consent. We invite you to use this letter to explore their feelings about being photographed while taking part in the programme.

Please complete the form attached. If you wish to discuss the matter, please contact the programme director.
Canterbury Christ Church University

Photography

Parental Consent Form

To Name of the child’s parent or guardian:

Name of child:

Occasionally, we may take photographs of the children at the University. We may use these images in the University’s printed publications, as well as on our website. We may also make video recordings for University use.

From time to time, the media may visit our University and take photographs or film footage of a visiting dignitary or other high profile event. Children will often appear in these images, which may appear in local or national newspapers, or on televised news programmes.

To comply with the Data Protection Act 1998, we need your permission before we can photograph or make any recordings of your child. Please answer questions 1 to 5 below, then sign and date the form where shown.

Please circle your answer

1. May we use your child’s photograph (unidentified) in University printed publications that we produce for promotional purposes? Yes / No

2. May we use your child’s image (unidentified) on our website? Yes / No

3. May we record your child’s image (unidentified) on video or webcam? Yes / No

4. Do you consent to your child being photographed or filmed in press events agreed by the University? Yes / No

5. Do you consent to your child’s full name being published with a press photograph? Yes / No

Please note that websites can be viewed throughout the world and not just in the United Kingdom where UK law applies.

‘Unidentified’ above means we will only use the first name.

Please note that the conditions for use of these photographs are on the back of this form.

I have read and understood the conditions of use on the back of this form.

Parent’s or guardian’s signature: ___________________________ Date: __________

Parent’s or guardian’s Name (in block capitals): ___________________________
Conditions of University Use

1. This form is valid for five years from the date you sign it. The consent will automatically expire after this time. It is your responsibility to let us know if you want to withdraw or change your agreement at any time.

2. The University will not use the personal details or full names (which means first name and surname) of any child or young person in a photographic image on video, on our website, in University printed publications.

3. The University will not include personal e-mail or postal addresses, or telephone or fax numbers on video, on our website, or in University printed publications.

4. If the University uses photographs of individuals, the name of that child or young person will not appear in the accompanying text or photo caption, unless we have your agreement.

5. If the University names a child or young person in the text, we will not use a photograph of that child to accompany the article.

6. Group or class photographs or footage with very general labels, such as “a science session” may be used.

7. Only images of children or young people who are suitably dressed will be used, to reduce the risk of such images being used inappropriately.

8. As the child’s parents/guardian, you agree that if you take photographs or video recordings of your child/ren that include other children or young people, you will use these for personal and family use only. Where consent has not been obtained from the other parents for any other use, there would be a breach of the Data Protection Act 1998 if recordings were used for any wider purpose.
Canterbury Christ Church University

Photography

Consent Form (for young people)

Name: ________________________________

Occasionally, we may take photographs at the University. We may use these images in the University’s printed publications, as well as on our website. We may also make video recordings for University use.

From time to time, the media may visit our University and take photographs or film footage of a visiting dignitary or other high profile event. Individuals will often appear in these images, which may appear in local or national newspapers, or on televised news programmes.

To comply with the Data Protection Act 1998, we need your permission before we can photograph or make any recordings. Please answer questions 1 to 5 below, then sign and date the form where shown.

1. May we use your photograph (unidentified) in University printed publications that we produce for promotional purposes? Yes / No

2. May we use your image (unidentified) on our website? Yes / No

3. May we record your image (unidentified) on video or webcam? Yes / No

4. Do you consent to you being photographed or filmed in press events agreed by the University? Yes / No

5. Do you consent to your full name being published with a press photograph? Yes / No

Please note that websites can be viewed throughout the world and not just in the United Kingdom where UK law applies.

‘Unidentified’ above means we will only use the first name

Please note that the conditions for use of these photographs are on the back of this form

I have read and understood the conditions of use on the back of this form.

Signature: _____________________________ Date: ________________
Conditions of University Use

1. This form is valid for five years from the date you sign it. The consent will automatically expire after this time. It is your responsibility to let us know if you want to withdraw or change your agreement at any time.

2. The University will not use the personal details or full names (which means first name and surname) in a photographic image on video, on our website, in University printed publications.

3. The University will not include personal e-mail or postal addresses, or telephone or fax numbers on video, on our website, or in University printed publications.

4. If the University uses photographs of individuals, your name will not appear in the accompanying text or photo caption, unless we have your agreement.

5. If the University names you in the text, we will not use a photograph of you to accompany the article.

6. Group or class photographs or footage with very general labels, such as “a science session” may be used.

7. Only images of individuals who are suitably dressed will be used, to reduce the risk of such images being used inappropriately.

8. You agree that if you take photographs or video recordings that include other children or young people, you will use these for personal and family use only. Where consent has not been obtained from the other parents for any other use, there would be a breach of the Data Protection Act 1998 if recordings were used for any wider purpose.
Section 15 Arrangements for Under 18s Arriving at the University from Outside the United Kingdom, Islands and Eire

Introduction

15.1 Under the Borders, Citizenship and Immigration Act 2009 section 55, there is a requirement to have regard to the need to safeguard children and to promote their welfare.

15.2 The University must ensure that all children (defined as those under the age of 18) studying in the UK have suitable care arrangements in place for their travel, their reception on arrival in the UK and for their living arrangements while in the UK. If the University fails in this duty, United Kingdom Visa and Immigration (UKVI) will immediately revoke the University’s Sponsor licence.

15.3 The arrangements for students under the age of 18 arriving at the University from outside the United Kingdom, Islands and Eire must be read in conjunction with other aspects of the Under 18s Policy, and appropriate action taken.

15.4 In drawing up these arrangements, the following sources have been used:

- UKVI Guidance (September 2011)
- UKCISA International students under 18: guidance and good practice (2008)

Responsibility for Implementation and Oversight of the Arrangements

15.5 Responsibility for securing the effective implementation of the arrangements set out in the following paragraphs rests with the head of the department where the University Admissions Agency resides.

15.6 The Admissions Agency must recognise that it is responsible for all aspects of the requirements set out, unless there is a specific agreement that another department (including the International Office) will assume responsibility for a particular arrangement.

Marketing, recruitment and publicity

15.7 Staff engaged in international recruitment in the Admissions Agencies, whether administrative or teaching staff, are to be made aware of the procedures relating to the admission of under 18s. They are to be able to give guidance on these to children and their parents within the limits of the information available and know to whom to refer them when this information is not available.

15.8 The Admissions Agency is to take into account whether the student or parent is making a booking or application direct or through an agent, and the impact this will have on the flow of information, e.g. whether agents are suitably briefed on the issues.
15.9 Parents and agents will be reliant on prospectuses and websites for information, and this is to be taken into account when producing documentation, for instance in providing visual information. Where possible, there should be a welcome address in the main languages. There should be a link to the University’s Under 18 Policy.

15.10 Parents should be given clear information that those under the age of 18 are in legal terms children in the UK, that there are regulations concerning children, and repercussions for the University if these are not followed. This might be made clear through inclusion in the parent consent form.

15.11 Sufficient information needs to be provided at the offer stage concerning their child’s programme, accommodation and leisure activities to ensure parents are informed about the detail of arrangements before signing any contracts. The information may be accessible on the web, in handbooks or in other documents. Separate copies should be provided for the parents and the child, so that the parents have access to copies while the child is away. It is good practice also to send parents a pre-arrival pack, with further information about the programme and activities available on and off-site.

**The University as an Adult Environment**

15.12 The offer letter from the Admissions Agency is to set out the extent of the responsibility the University has concerning Under 18s and the supervision that can realistically provide, taking account of the kind of educational experience.

15.13 Parents of international students may have very little knowledge of the education system in the UK and may not be aware that the University is primarily an adult environment. They may assume that the child will be in a supervised environment, akin to a boarding school. Parents should be made aware of the amount of freedom their child will have, and their attention drawn to the general information provided for all students about the security measures and support available on site and in accommodation to enable them to make a decision about whether the University will provide a suitable environment.

15.14 As part of the consent form, parents should sign an agreement noting the child will be in a primarily adult environment, and this includes student accommodation.

**UK Guardians**

15.15 Where the child is on a longer programme (more than four months) it should be recommended by the Admissions Agency that parents consider appointing a UK-based guardian e.g. if someone needs to take responsibility for the child during vacations. Account should be taken of the date the child turns 18, as the requirements will no longer apply.

15.16 Parents are to be made aware that they are responsible for the welfare of their children when they are staying with the guardian, not the University. The University should request parental permission to contact the guardian in
the event of an emergency and to send copies of information concerning students to their ‘guardians’ as well as to parents.

**Insurance**

15.17 Advice should be given on the desirability of taking out insurance, and to make clear, for instance, what medical costs students would be covered for by the NHS, and what costs they should expect to have to pay for.

15.18 This insurance might include: personal accident or injury, private medical, personal belongings, delayed or lost luggage, money, emergency replacement passport, cancellation, travel delay, missed departure, personal liability.

**Visa and immigration requirements**

15.19 Information sent to parents is to include information on visa requirements, including details of the likely length of time needed to apply and the documentation required.

15.20 The International Student Adviser provides immigration advice to students (prospective, current and recent graduates) and their immediate dependants.

**Disabilities**

15.21 It is essential that any disabilities mentioned on the application form are followed up with Student Support and Guidance to ensure that support can be provided and that it will be in place when the child arrives, as the child may not have coped without the support of the family before. Discussions will be necessary to ensure that all the support needs have been identified. Both students and their families may be used to quite different systems of support, as well as different cultural attitudes to disability.

15.22 The Admissions Agency should identify areas where it may be required to fund equivalent provision to ensure international students with disabilities do not receive less favourable treatment and ensure parents are aware of any additional costs at the earliest opportunity.

15.23 The Admissions Agency should obtain a signed written guarantee from parents that they will meet the cost of any support (e.g. for personal care) that the University does not provide and for which these students are ineligible to receive from elsewhere (e.g. Social Services).

**Arrangement for Meeting and Greeting Under 18s**

15.24 The Admissions Agency is to ensure there are special and appropriate arrangements in place for the arrival of international students under 18. These arrangements are to operate in conjunction with the parents. If the parent undertakes responsibility, through means of a signed statement, for accompanying the student to the reception area in the University, the following arrangements do not apply.
15.25 The Admissions Agency will request that the parents ensure that the child has the following information available on arrival in the UK (following advice from the UKVI):

- a signed letter from their parents or guardian giving permission to travel
- the name of the person with whom they are staying (homestay or residence)
- a confirmation of offer letter from the University (the CAS for overseas students or an unconditional Offer letter if an EU student)
- the name of the Vice-Chancellor and the Head of the International Office
- the transport arrangements from the airport or other point of entry (e.g. the contact details of the Admissions Agency representative or the UK guardian meeting the child or the taxi firm that is collecting the child from the airport or other point of entry)

15.26 The Admissions Agency will ensure the parents have details of what meet and greet arrangements the University will provide for their child, how to book these and the costs involved, as well as emphasising that, if the service is not available at all times, the parents are responsible for making appropriate arrangements outside the set times. The price should be set and published in advance.

15.27 All under 18s travelling without an adult are to be met at the airport or other point of entry. Where possible, this will be by an Admissions Agency representative unless there are specific arrangements made in advance for an under 18 student to be met by a local guardian appointed by the parent, guardian or carer and signed written authorisation is provided to the University in advance of departure.

15.28 Where the Admissions Agency is responsible for meeting the child at the UK airport, parents (or their appointed representatives) are required to complete detailed travel information for the arrival of the child by a specific date prior to their arrival. Any additional costs incurred by the University in assisting a child because of a failure to notify will be charged to the parents.

15.29 The travel information is to include the point of departure and details of departure, including times, and any connection details, as well as the arrival data.

15.30 The Admissions Agency will ensure that unaccompanied children entering the UK are provided with an emergency contact number to call if they encounter problems at immigration.

**Parental Responsibilities**

15.31 It is to be made clear to parents that they have a responsibility in ensuring the safe arrival of their child. The Admissions Agency should request that parents ensure the child has the following:
• the written details of the telephone number, address and contact
details of the person meeting them and advise them to go with no
one else
• a passport valid for the period, with visas obtained for the countries
the child is travelling to or through
• a photocopy of the passport, kept in a separate place from the
passport
• a copy of the travel arrangements (including flight return details)
• the parents’ contact details, which should also be written in the child’s
passport
• the address of the nearest embassy or consulate in case of the need
to contact someone urgently
• some money or credit to phone if there is a need to and the full
telephone number of all necessary contacts
• any essential medication placed in the hand luggage
• details of prescriptions for medicines, which should be kept separate
from the medicines
• the letter of acceptance
• details of any airline child supervision service where the child will be
supervised by a member of the airline staff
• details of the meet and greet arrangements, whether by the
Admissions Agency representative, UK guardian or through other
agreed arrangements
• instructions that if for any reason the child misses the representative
at the arrivals point to go to the information desk and phone the
emergency contact number and remain at the information desk until
the contact arrives and not leave the building

15.32 In the case of written information, the parents should provide it in an English
language translation wherever possible.

_Taxis_

15.33 Where it is necessary to the Admissions Agency to arranges a to collect the
child, the Admissions Agency will request the taxi company gives written
confirmation whether or not an enhanced DBS check has been undertaken
for their taxi drivers.

15.34 It is advisable that taxi companies use chaperones for those students under
18 travelling alone as a precaution for students and to protect drivers against
false allegations of abuse. The arrangements need clarifying with the taxi
company.

15.35 The Admissions Agency will be responsible for ensuring the payment of the
cost of the taxi, including the recharging of the parents where this forms a
contractual term. Such contractual terms must be agreed in advance of the
arrival of the student. It will be usual that the parents would meet the cost
of the taxi as part of the agreement.