



# UNDER 18s SAFEGUARDING POLICY

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**SAFEGUARDING ISSUES SHOULD BE ADDRESSED TO THE HEAD OF SAFEGUARDING**

**The University Head of Safeguarding is Annelli Peavot**

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# CANTERBURY CHRIST CHURCH UNIVERSITY

## UNDER 18s SAFEGUARDING POLICY

### INTRODUCTION

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

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

Children and young people visit University premises for various 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 courses who are under 18 for their registration period. Researchers may involve under-18s in their research. Funding can depend on having procedures for checking staff, a safeguarding policy and ethical approval.

The document draws on the policy statements relating to safeguarding. There was particular use made of [Working together to safeguard children, a guide to inter-agency working to safeguard and promote the welfare of children.](#) It also drew on other advice issued by the Department for Schools.

It is a working document which provides advice and support for those engaged in courses and activities with children and young people. For ease of access, there is a summary of the contents, and the material is in sections.

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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. It 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, particularly *directors of courses and activities*.

The directors of courses and activities are responsible for ensuring that **all staff and volunteers** understand the Safeguarding Policy before the commencement of the course or activity.

Directors should provide a copy of the Safeguarding Policy 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 addressing 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, particularly *directors of relevant courses and activities*.

It is the responsibility of *directors of courses and activities* to ensure that **all staff and volunteers** understand the Code of Practice before the commencement of the course or activity.

Where necessary or appropriate, *directors of courses and activities* may supplement this Code of Practice with a statement specific to the course or activity. Any supplementary information 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 necessary action if there are any allegations.

*Directors of courses and activities* are to make this section

available to **all staff and volunteers** working with children and young people and ensure that **all staff and volunteers** understand the Guidelines before the commencement of the course or activity.

## Section 4

### Health and Safety

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

**Directors of courses 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 course or activity.
- (b) **All staff and volunteers** understand the requirements relating to health and safety in advance of the commencement of the course or activity.
- (c) All risk assessments are properly completed, recorded, discussed with relevant staff and volunteers, and stored.
- (d) There are arrangements for recording, investigating and reporting all accidents, incidents and near misses.

## Section 5

### Insurance

This section sets out the requirements for insurance for courses and activities for those under 18 years.

The section is relevant to **Heads of School/Department** and **directors of courses and activities**. This section must be made available to relevant staff and volunteers where necessary.

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

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

## Section 6

### Organising Formal Activities for Children and Young People at the University: A Guide for Directors of Courses and

## Activities

This section sets out the main issues of a practical nature that need consideration when organising a course or activity. The arrangements will differ. The advice aims 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 courses and activities* who need to bring it to the attention of appropriate staff and volunteers.

## Section 7

### Disclosure and Barring Service

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

It is relevant for those responsible for the engagement of staff and volunteers for courses 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 for work experience for people under 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 for employment of people under 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 contracting services to children and young people.

## Section 11

### Complaints made by Students under the Age of 18

This section sets out the arrangements should a child or young person who is a student wish to complain.

The procedure follows the University complaints procedure for

students, taking account of the parent, guardian or carer.

The section is of relevance to *Course Directors*.

## **Section 12 Children and Young People as Research Participants**

This section identifies several issues concerning children and young people as research participants.

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

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

This section sets out the policy of the University relating to children and young people on University sites, other than for courses 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 people in all University-related activities.

The section is relevant to *Heads of School/Department* and *directors of courses and activities*. This section must be made available to relevant staff and volunteers where necessary.

## **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 the meeting for children from outside the UK, islands and Eire. It is at the point of entry to the UK and includes arrangements for transportation to the University campus.

The section is relevant to *heads of Admissions Agencies*. This section must be made available to relevant staff and volunteers where necessary.

## **Section 16 The Prevent Duty**

This section sets out the University's approach to the Prevent duty. The statement is as much for an external audience as for *all staff and volunteers*.

The Prevent Duty relates to staff, students and visitors. It is

essential to recognise that children can be particularly subject to grooming, leading to radicalisation. Concerning children, this section needs reading in conjunction with Section 3.

## SECTION ONE

### UNIVERSITY UNDER 18 SAFEGUARDING POLICY

- 1.1 The [Children Act 1989](#) s105(1) defines a 'child' as a person under 18. The [Management of Health and Safety Regulations 1999](#) s 1(2) regard a 'child' as a person not over the minimum school leaving age and a 'young person' as someone who has not attained the age of 18.

#### *Statement of Principles*

- 1.2 Canterbury Christ Church University recognises children and vulnerable groups have a right to protection. As far as is reasonably practicable, the University commits to providing an environment safe from harm for those under 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 appropriate procedures are in place to deal with child abuse allegations. The University will respond to any allegation of abuse with all due speed.
- 1.5 Safeguarding depends on all staff and agencies working together and overrides confidentiality, relationships with the family and hierarchy.
- 1.6 We set out our approach to safeguarding in our [Safeguarding Statement of Policy](#).

#### *Managerial Responsibility*

##### *(a) Senior Management*

- 1.7 The responsibility for oversight of our [Safeguarding Statement of Policy](#) rests with the Vice-Chancellor, with delegated responsibility to the relevant members of the University.

##### *(b) Director of Student Resolution and Student Protection*

- 1.8 The Director of Student Resolution and Student Protection is responsible for implementing our [Safeguarding Statement of Policy](#) on behalf of the Vice-Chancellor.

The Director of Student Resolution and Student Protection is Dr Dionne Spencer
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Email: <a href="mailto:safeguarding@canterbury.ac.uk">safeguarding@canterbury.ac.uk</a>
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- 1.9 The University Head of Safeguarding is responsible for coordinating all safeguarding matters. The University Head of Safeguarding
- a. oversees the handling of individual cases
  - b. provides guidance and support relating to safeguarding



- c. advises on specific procedures for individual services
- d. ensures the highest level of confidentiality while ensuring that information is shared as necessary to safeguard individuals
- e. ensures the University's compliance with legislation, regulation, relevant guidance and the protection of the University's reputation

The University Head of Safeguarding is Anelli Peavot.

Email: [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk)

- 1.9 Heads of school/department should identify the University's Head of Safeguarding to all staff and volunteers organising activities involving children and young people. They must draw attention to this Safeguarding Policy and associated documentation. It includes summer schools and University courses of study for under 18 students and research involving Under 18s.

(c) **Admissions**

- 1.10 The University is only to make offers of admission to students under 18 at registration if the student is equipped to study within a mainly adult, independent learning environment. The University is to notify applicants of the safeguarding arrangements and the expectation there will be compliance with support and safeguarding under-18s (for example relating to licensed premises on campus and providing emergency contact details).
- 1.11 It is the responsibility of the relevant Head of School/department or person responsible for recruitment and admissions for a specific course or activity to identify children and young people early and notify the appropriate staff members of these students.

(d) **Director of the Course or Activity**

- 1.12 The key managerial responsibility for any course or activity rests with the individual appointed by a member of the Senior Management Team or Head of school/department. This individual is termed 'the director of the course or activity', although titles may differ according to the event.
- 1.13 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 course or activity.
- 1.14 The director of the course or activity is responsible for
- (i) ensuring the course or activity is planned, organised and delivered following this policy;
  - (ii) devising how the requirements regarding safeguarding are implemented;

- (iii) providing any safeguarding statement for the course or activity that is additional to this policy;
- (iv) arranging the training, induction and guidance for all staff and volunteers appropriate for the course or activity concerned, which includes drawing attention to this policy;
- (v) informing the University Head of Safeguarding of specific safeguarding measures for the course or activity, including the name of any appointed person for those safeguarding measures where this is appropriate.

1.15 There is separate guidance on safeguarding students who are under 18 in [Under 18s on University Award Bearing Programmes: Safeguarding Procedure](#).

#### *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 must be undertaken as part of the recruitment process. 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 staff members working closely with children or young people are responsible for safeguarding. It means being alert to the possibility that a child or young person may have been, or potentially at risk of being, abused.
- 1.19 Any member of staff or volunteer with any concern about safeguarding a child or young person should take action. They should contact the designated safeguarding officer for the course activity or the Faulty Safeguarding Lead immediately. If immediate contact is not possible, they should email [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk).

#### *Scope of the Safeguarding Policy*

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

#### *Availability of the Safeguarding Policy*

1.21 Directors of courses or activities should inform parents, guardians and carers that this Safeguarding Policy is available upon request.

#### *Review of the Safeguarding Policy*

1.22 The University will review the Under 18s Safeguarding Policy periodically.

## SECTION TWO

### UNDER 18 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.

#### *Director of Student Resolution and Student Protection and Head of Safeguarding*

- 2.1 The Director of Student Resolution and Student Protection is responsible for implementing our [Safeguarding Statement of Policy](#) on behalf of the Vice-Chancellor.

The Director of Student Resolution and Student Protection is Dr Dionne Spencer

Email: [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk)

- 2.2 The University Head of Safeguarding is responsible for coordinating all safeguarding matters within the University. The University Head of Safeguarding
- a. oversees the handling of individual cases
  - b. provides guidance and support relating to safeguarding
  - c. advises on specific procedures for individual services
  - d. ensures the highest level of confidentiality while ensuring that information is shared as necessary to safeguard individuals
  - e. ensures the University's compliance with legislation, regulation, relevant guidance and the protection of the University's reputation

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Email: [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk)

- 2.3 The Head of Safeguarding is responsible for instituting any investigation into allegations of child abuse. It is the responsibility of the Head of Safeguarding to determine the means of making an appropriate University response. Depending on the nature of the allegations, such a response may include
- a. a recommendation for precautionary action for those against whom allegations are made
  - b. consultation with an outside agency, such as the Kent Social Services Department or Kent Police.

- 2.4 The Head of Safeguarding 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 Head of Safeguarding, what information will be conveyed to the parents, guardians or carers and at what stage.

2.5 The Head of Safeguarding will keep all records relating to safeguarding issues, including allegations of child abuse.

2.6 To ensure the University complies with the legal requirements arising from the RIDDOR regulations, the University Head of Safeguarding shall report to Health and Safety relevant safeguarding incidents. Please refer to Section 4 on Health and Safety.

#### *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 course or activity. It will usually be the Course Director or director of the activity.

#### *Arrangements for Checks on Staff*

2.8 Where at the time of appointment, the University knows staff will be working with children, there is a need to make appropriate checks regarding the person's past before making an offer of appointment. Where the duties of a member of staff change so that they begin working with children, the checks will be undertaken at that time. Checks must be undertaken before the person begins engaging in regulated activity. It needs to be made clear in any offer of appointment. This includes taking up references and ensuring that the referees know the individual's work, preferably as a line manager, and that at least one reference is 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 applicants are suitable for the post advertised and their suitability to work with children. In some cases, it may be appropriate to check on the referee's identity. 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 to be completed before the commencement of the course or activity.

#### *Suspicion of Abuse arising during Conversations*

2.11 If during the course of a conversation, a member of staff or volunteer has any reason to suspect that there has been an abuse of a child or young person, 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 or volunteer making the report needs to be stated, and the report signed, dated, and passed to the appointed person or University Head of Safeguarding.

#### *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 brought 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 Head of Safeguarding. Where it is not possible to inform the appointed person, or there is no appointed person, it is essential to inform the University Head of Safeguarding.
- 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 Head of Safeguarding 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 another person, the welfare of the child or young person is paramount and not to pass the information on resulting in abuse 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 Head of Safeguarding 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 Head of Safeguarding if no receipt arrives within five working days.
- 2.18 There is a referral process to the [Kent Safeguarding Children Multi-agency Partnership](#) if a concern arises about the safety of a child or young person. Normally, a referral is made through the University's Head of Safeguarding. However, if the child is in immediate danger, call the emergency services using 999. If you need to make contact out of working hours when the University Head of Safeguarding is unavailable, please call the Out of Hours Service on 03000 41 91 91 and make an immediate report to the Head of Safeguarding.

### *Confidentiality and Abuse*

- 2.19 When there are any concerns, it is essential to respect the child's or young person's privacy. Only those who need to know should receive information. 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 can reassure the child or young person that only those who need to know will receive information, but it will not be shared unless necessary.

### *Bullying*

- 2.20 The director of the course or activity is to report any instance or allegation of bullying of children or young people to the University Head of Safeguarding, together with a report of the action taken.

### *Abuse of Trust*

- 2.21 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. It applies even if the relationship is consensual.
- 2.22 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 the 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.
- 2.23 It is a defence to show the person charged did not know, or could not reasonably have known, that the other party was a person in relation to whom he or she was in a position of trust.

### *Training and Guidance*

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

### *Kent Safeguarding Children Multi-Agency Partnership*

- 2.25 [Kent Safeguarding Children Multi-Agency Partnership](#) (KSCMP) works to protect and safeguard the children of Kent. Through its website, KSCMP publishes information relating to safeguarding, including training arrangements.

## SECTION THREE

### SAFEGUARDING - GUIDELINES FOR STAFF AND VOLUNTEERS

Reading these guidelines in conjunction with the University's Safeguarding Policy and Code of Practice and other supporting documentation is essential.

#### *Head of Safeguarding*

3.1 The Head of Safeguarding is Anelli Peavot.  
Email: [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk)

#### *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 abused sexually 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 is dangerous, and children can suffer serious and long-term harm.

##### Emotional abuse

Children who are abused emotionally 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 exploited sexually 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 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.

### **Criminal exploitation and gangs**

Children and young people involved with gangs and criminal exploitation need help and support. They might be victims of violence or pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited and put into dangerous situations.

### **Non-recent abuse**

Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under 18. Sometimes adults abused in childhood blame themselves or are made to feel it's their fault. But this is never the case: there's no excuse for abuse.



- 3.3 There are several different definitions used by different sectors/agencies in respect of child sexual exploitation. The [Department of Education](#) introduced a standard definition as follows:

‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.’

#### *Avoiding Allegations of Abuse*

- 3.4 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. Staff and volunteers must be mindful of the need to minimise the opportunities for such allegations.
- 3.5 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. For counselling and mentoring roles, it is essential to draw up a risk assessment where this is not possible.
  - (b) Always be publicly open when working with children and young people, avoiding 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 coaching or instruction, the person must do this openly. Children and young people and their parents, guardians, and carers are becoming increasingly sensitive about their being touched, which needs respect.
  - (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. Another adult should accompany the staff member or volunteer if a visit is necessary.
  - (g) For private car journeys, it is important to obtain written permission from the parent, guardian or carer before the commencement of the journey. Only in exceptional circumstances should there be a reliance on oral permission. The presence of a further adult in the vehicle should be normal. A child should sit in the rear of the car. The law requires all children to travel in

the front or rear seat of any car, van or goods vehicle and must use the correct [child car seat](#) until they are either 135 cm in height or 12 years old (whichever they reach first). After this, they must use an adult seat belt. There are very few exceptions. Information on child seats is available on the Government website: [Child car seats: the law](#). It is essential to check the insurance cover to check the policy covers business **before** using a private car for University business.

- (h) It is impossible 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*

- 3.6 There are occasions when physical contact with children and young people is necessary or appropriate. However, members of staff and volunteers must be aware that their actions may be misunderstood whenever they touch a child or young person.
- 3.7 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
- 3.8 Staff and volunteers should understand that individuals are often sensitive about physical contact. Staff should refrain from making physical contact.

#### *Formal Interviews with a Child or Young Person*

- 3.9 Sometimes, it is necessary to interview a child or young person or conduct a formal private discussion for a 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.
- 3.10 It is desirable to conduct interviews in a public place, for example, in an open office or classroom, while also maintaining confidentiality. It is essential to take notes of the interview. Those conducting the interviews need to consider
  - (a) who should be present,
  - (b) whether more than one person should be involved in the interviewing of the child,
  - (c) whether a parent, guardian, carer or another responsible adult should accompany the child and
  - (d) whether the interviewer's characteristics are likely to raise issues bearing the child and young person in mind.

### *Protocol for Interviews with Children and Young People*

- 3.11 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, either to take a break or to terminate the interview.
  - (d) Interviewers will keep all information confidential, except when Safeguarding concerns arise during the interview. Any such concerns need to be communicated in the first instance to the appointed person or, if this is not possible, to the University's Head of Safeguarding.

### *Interviews Concerning Alleged Abuse*

- 3.12 Only a person appointed by the University Head of Safeguarding or nominee is to inquire into abuse allegations.

### *Guidelines should abuse be observed or reported*

- 3.13 If you suspect a child is suffering abuse, receive a disclosure, or have concerns about another member of staff's conduct (including volunteers), you must take immediate action.
- 3.14 Reporting abuse allegations is sensitive, particularly when made against someone known personally or professionally. Knowing 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.
- 3.15 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. Including a description of the observed injuries may be necessary, particularly if sustained during the event. You must submit the information to the University Head of Safeguarding, who will retain the document and liaise with the Safeguarding Children Board, parents/carers and other agencies. It is essential to store any recorded information in secure/confidential files: password-protected computer files or locked storage for physical records.
- 3.16 Careful handling at an early stage can facilitate the reporting and referral process. It may be crucial in winning the child's or young person's confidence.
- 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 Head of Safeguarding for

advice on the appropriate support arrangements.

### *Guidelines On Handling A Disclosure From A Child*

- 3.19 It's normal to feel overwhelmed and confused in this situation. Child abuse is a complex subject that can be hard to accept and even harder to discuss. The perpetrators often threaten abused children to keep the abuse a secret.
- 3.20 Telling an adult takes an incredible amount of courage. Children must grapple with many issues, including the fear that no one will believe them. So, care must be taken to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.
- 3.21 The following points are important for those who revelations of alleged abuse may confront:

#### **Receive:**

- (a) Stay calm and do not take hasty or inappropriate action.
- (b) Take it seriously
- (c) Do not display shock or disbelief. Demonstrate that you take the matter seriously. A potential reaction to the news as unpleasant and shocking as child abuse is denial. However, if you display denial, shock or disgust, the child may be afraid to continue and shut down.
- (d) Accept what is said without judgement.

#### **Reassure**

- (e) Reassure the child or young person that they did nothing wrong and that you take what is said seriously.
- (f) Reassure only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".
- (g) Don't promise confidentiality – never agree to keep secrets. You have to report your concerns.
- (h) Tell the child that you will need to tell some people, but only those whose job is to protect children.
- (i) Acknowledge how difficult it must have been to talk. It takes a lot to come forward about abuse.
- (j) Do not offer any opinions or solutions to the young person or make any promises

#### **React:**

- (k) Listen quietly, carefully and patiently.
- (l) Do not assume anything – don't speculate or jump to conclusions.
- (m) Do not investigate, interrogate or decide if the child is telling the truth. For example, an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation.
- (n) Let them explain what happened to you in their own words.
- (o) Do not stop or interrupt a child who is recalling freely significant events.
- (p) Do ask open questions like "Is there anything else that you want to tell me?"
- (q) Do not ask leading questions that suggest a particular answer.
- (r) Talk in a way appropriate to their age, understanding and preference. It is especially important for those with disabilities or whose preferred language is not English.

**Record:**

- (s) Make brief verbatim notes of what the person says at the time and write them up in detail as soon as possible.
- (t) Do not destroy your original notes in case of later queries.
- (u) Record the date, time, place, words used by the child and how the child appeared to you – be specific.
- (v) Record the actual words used, including any swear words or slang
- (w) Record statements and observable things, not your interpretations or assumptions – keep it factual. Do not summarise the statements, and do not engage in conjecture.

**Refer:**

- (x) You must report the matter immediately to the appointed person responsible for safeguarding issues for a particular course or activity and the University Head of Safeguarding.
- (y) Do not discuss the case with anyone outside the child protection team.
- (z) Do not approach anyone about whom there is an allegation of abuse.

### *External Relations*

- 3.22 An allegation of child abuse or that staff may have criminal convictions likely affects their suitability to work with children and young people. It is likely to have a high profile and be widely reported. The Director of Marketing and Communications or the Director of Student Resolution and Student Protection must be engaged in dealing with such matters.
- 3.23 Should there be an enquiry from the media relating to any allegation, the department, School course or activity level should not deal with the enquiry. All members of staff or volunteers must refer the journalist to Corporate Communications in the Department of Marketing and Communications.
- 3.24 No member of staff or volunteer is to make any comment.

### *Sources of Information*

#### *Department for Education*

##### *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*

##### *Types of abuse*

##### *Keeping children safe*

##### *Child protection in the UK*

## SECTION FOUR

### HEALTH AND SAFETY

#### *Duty of Care*

- 4.1 The University has a duty of care to its students and visitors, not to endanger them and do what is reasonably practicable to achieve this. This duty of care extends to uninvited visitors, including trespassers.
- 4.2 Any adult with children and/or young people under their care or control must take reasonable care to ensure their safety. The level of care depends upon the child's maturity and ability, and common law will take into account the size of the group in determining what amounted to reasonable care in the circumstances.
- 4.3 The Occupiers' Liability Act 1957 requires that an occupier anticipates that children and young people are less careful than adults. It places a higher duty of care on the occupier when children and young people are on the premises.
- 4.4 A general principle identifies the standard of care for teachers as that of a reasonably prudent parent, considering that a teacher has responsibility for a whole class. Teachers are not required to achieve perfection concerning their supervision. The standard of care expected is the application of the ordinary skills of a competent professional and the skill and care of a reasonable teacher.

#### *Risk Assessment*

- 4.5 All University activities should be subject to suitable and sufficient risk assessment(s) under the University [Health and Safety Policies](#) (intranet access only). It is to meet its duties under the [Management of Health and Safety Regulations 1999](#).
- 4.6 Heads of School/Department and Directors of courses are responsible for ensuring that risk assessments involving children and/or young people are in place. Risk assessments must consider the higher duty of care and ensure that safety precautions detailed in the risk assessments are implemented and complied with at all times by all staff.
- 4.7 There are also statutory restrictions regarding activities that children and young persons may carry out in the workplace. Guidance from the [Health and Safety Executive](#) needs consulting for up-to-date information on these restrictions.
- 4.8 The risk assessment(s) should cover:-
  - Risks that arise from all activities under the School/Department control (on campus or off campus) and from buildings. It is to identify areas where it is necessary to exclude children and young people and/or to implement additional control measures.
  - Fire safety, evacuation and arrangements for children and young people requiring further assistance to evacuate within a reasonable timeframe;

- Any medical needs and/or medication requirements of a child or young person and include arrangements for supervision by an appropriately qualified specialist, if this is necessary.
- 4.9 Those responsible for undertaking risk assessments should attend the Health & Safety Risk Assessment training and refer to the University [Risk Assessment Policy](#) (intranet access only). Further advice is available in the Health & Safety [web-based guidance](#)(intranet access only).

#### Work placement/voluntary work/work shadowing

- 4.10 When a child or young person undertakes a work placement or volunteers at the University, there needs to be a risk assessment covering the activities undertaken by the child or young person. The risk assessment must be shared with the individual's parents, guardians, and carers.
- 4.11 Information regarding the additional risk assessment obligations is in Section 8 of this Policy and on the [Health & Safety website](#) (intranet access only).

#### Research Participants

- 4.12 Section 12, 'Children and young people as research participants,' should be referred to when considering additional risks to be assessed when including young people as research participants.

#### Planning a Course of Study

- 4.13 Section one of this Policy outlines the responsibility for the early identification and notification of children and young people on a course of study. Directors of courses or those responsible for activities should carry out risk assessments for all activities undertaken as part of the course, ensuring that risks are adequately controlled.

#### Local School Visits and Activities

- 4.14 The activity risk assessment covers visits from a group of children and young people to the University. It is necessary to consider the guidance in Section 6 of this Policy and address supervision responsibility at all points of the visit. The risk assessment must form part of the information provided to the visiting organisation before the commencement of the trip and following timescales agreed between relevant parties.

#### *Accidents, Incidents and Near Misses*

- 4.15 All accidents, incidents and near misses must be reported to Health and Safety. The [University Policy and Guidance on reporting accidents and incidents](#) (intranet access only) sets out staff responsibilities.
- 4.16 When required, reporting incidents to the Health and Safety Executive (HSE) is the responsibility of the University Health and Safety Manager.
- 4.17 The Director of the course or activity should inform the parent, guardian or carer as soon as is reasonably practicable of any injury or hospitalisation



- 4.18 To ensure the University complies with the [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations](#) (RIDDOR), the Head of Safeguarding reports to Health and Safety on relevant safeguarding incidents related to Under 18s individuals.
- 4.19 The incident reporting requirements cover incidents where the Under 18s individual is
- (a) an employee of the University, including a volunteer, individual on a work placement, apprentice under a university contract of employment)
  - (b) a student or visitor to the University who sustained an injury arising or connected to work activity is taken directly to a hospital for treatment.

#### *[Trips and Activities away from the University](#)*

- 4.20 It is the responsibility of the School/Department to ensure that a risk assessment is in place for all external trips and activities before the event. Where third parties are involved, responsibilities over activities and risk assessment need agreeing when selecting a competent provider. Further information regarding external events is available on the [risk assessment webpages](#) (intranet access only). Guidance is available from the Universities Safety and Health Association (USHA ) on [health and safety in fieldwork and travel](#).
- 4.21 It is essential to check the qualifications and suitability of the supervising staff when students or young people are undertaking physical and adventurous activities. It is also crucial to be familiar with the safety arrangements.
- 4.22 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](#) and the Adventure Activities Licensing Regulations 2004.
- 4.23 Student-staff ratios should be determined based on the risk assessment, taking into account the activity to be undertaken, competence and experience of staff involved and the age, gender, maturity and any medical needs of the children and young people. The NSPCC provides [Guidance on appropriate levels of supervision for children and young people](#).
- 4.24 When arranging trips and visits outside the University, Directors of courses and activities should attend to insurance issues outlined in Section 5 and obtain the consent of the parent, guardian or carer.

#### *[Emergencies](#)*

- 4.25 The Children Act 1989 section 3(5) empowers a person who cares for a child to do what is reasonable in all the circumstances of the case to safeguard or promote the child's welfare. In the event of an emergency where the child is unlikely to be able to give consent to trespass to the person, staff would be able to rely on the common law defence of necessity concerning any action taken to diminish the danger for the child.
- 4.26 The director of the course or activity should collect an emergency contact number readily accessible in an emergency. It includes providing access when the Head of Safeguarding is unavailable, or the course or activity office is closed.

- 4.27 An appointed staff member should take charge when someone is injured or ill and summon emergency help when necessary. The course director or those responsible for the activity must follow the University's emergency procedures.

### *Medication*

- 4.28 Where participants on a course or activity have medical needs, there will be issues to address regarding responsibility for these children and young people. A source of valuable information is the Department for Education Publication [Supporting pupils with medical conditions at school](#)
- 4.29 Responsibility regarding the medical needs and administering medicines for children and young people depends on who has responsibility for the individual whilst in attendance at the University or on any associated visits. It should be determined before the commencement of the activity, and all parties involved aware.
- 4.30 There is a requirement to control and record all medicine administrations. The level of supervision will depend upon the child's age and ability. Usually, secondary school children and above can take care of their medication and undertake self-administration.
- 4.31 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 provide the responsible person with an appropriate written medical history and the child's GP details.
- 4.32 It is vital to know of any serious allergies and health problems. Emergency administration is an area where additional training may be required, such as using an 'EpiPen'. Where there are children and young people who need this, it is to be applied only by those trained in their use. The responsible person should have a clear, written plan, shared with the relevant staff and volunteers, of the action in such circumstances.
- 4.33 Children and young people with longer-term medical needs should have a health care plan. Requesting a copy from parents, guardians or carers and the consent form is essential. It is crucial to obtain sufficient information about the child's needs. Directors of courses and/or activities need to know and share with the appropriate people:
- 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
- 4.34 Procedures must be in place for the 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 administering
- check that the medication has not exceeded the 'use by' date before each administration
- Medicines should be locked away unless required to be more readily available to the child or young person, for instance, inhalers for asthma. They must not be available to others.

### *Sources of Information*

#### (a) University Information (intranet access only)

[Health and Safety](#)

[University Policy and Guidance on reporting accidents and incidents](#)

[Risk Assessments and Risk Assessment Policy](#)

[If you require a first aider](#)

#### (b) External Information

[Supporting pupils with medical conditions at school](#)

[First Aid in Schools](#)

[Health and Safety Executive \(HSE\) Young people at work](#)

[NSPCC Guidance on appropriate levels of supervision for children and young people](#)

[HSE Guidance on 'Incident reporting in schools'](#)

[The Right Start - Work experience for young people INDG 364](#)

## SECTION FIVE

### INSURANCE

- 5.1 This section applies to those responsible for organising any activity involving children and young people, including Heads of school/department and directors of courses 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 full insurance cover is automatically in place. It is necessary to provide the University's Insurance Officer 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 course or activity is responsible for notifying the Insurance Officer of all activities, except for students under 18 years of age on University award-bearing courses.
- 5.5 Directors of courses or activities should give as much notice as possible to the Insurance Officer. They should provide full details of intended activities (including any off-campus) to confirm the appropriate levels of cover before the activity starts. Directors of Courses will be informed if this involves additional premiums, which may be recharged at appropriate costs. The University Insurance Officer will immediately report any risk areas that insurers decline to cover. It is 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 covers 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. It 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 courses or activities involving children or young people at the University must be declared to insurers as this may result in an additional premium.

### *Information Required by Insurers*

- 5.8 Insurers would generally require the following information for under-18 activities with the University
- (i) Number, age and sex of those 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 the 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. The directors of activities should inform parents & Guardians, so they arrange personal contents insurance to cover possessions and valuables (including musical instruments) for those under 18s while 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 courses and activities must notify the Insurance Officer of any potential claim as soon as is reasonably practicable. Claims should be directed to the Insurance Officer immediately. Background information for both should include:
- the name of the child or young person
  - the name (and approximate 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 Officer, it is vital to complete a report on the incident. The Health and Safety Manager may conduct an independent investigation into the accident. For further information, refer to Section 4, Health and Safety.

### *Employing Young People*

- 5.13 The Employer's Liability policy includes children and young people working for the University.

### *Young Students*

- 5.14 The University's exposure to claims for injury or loss to any young person registered as a student on a course due to University actions, property or equipment falls under the University's Public Liability Insurance cover. Any claim needs to be

referred to the University's Insurance Officer.

- 5.15 Should a child or young person registered as a student be involved in work experience outside the University, the Course Director must ensure the host Employer's Public Liability extends to cover the student. If there are any issues, the Course Director should contact the University's Insurance Officer.

### *Summer Schools*

- 5.16 The University's liability for injury to Summer School visitors, including those under 18s or damage to their property caused by University staff, property or equipment, is included under the University's Public Liability cover. Where Summer School activities take place off Campus at recognised establishments (such as outward-bound centres/museums), then during such time, the establishment's Public Liability Insurance will cover their visitors, including those under 18. Directors of Courses or Activities are asked to advise the Insurance Officer with relevant details before the start of the Summer School so that University's insurers can be put on notice
- 5.17 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
- 5.18 Where there is a summer school that entails taking the participants on a trip within the UK away from the campus, especially if overnight, the originating school or college must take out a group (schools) travel policy. Summer Schools originating from abroad need their travel insurance, and the director of the course or activity should satisfy themselves this is in place.

### *Visits outside the UK*

- 5.19 Where there is an intention to take summer school participants to another country, it is essential to gain specific written consent from the parent, guardian or carer.
- 5.20 The arrangements for [European Health Insurance Card](#) changed when the UK left the European Union. For most people, the [UK Global Health Insurance Card](#) (UK GHIC) replaces the existing European Health Insurance Card for new applications.
- 5.21 Where there is an intention to travel to countries outside the EU, it is essential to consult the Foreign and Commonwealth Office advice and follow the advice given.
- 5.22 There is a need to arrange travel insurance cover through the Insurance Office.

### *Research Projects*

- 5.23 The University has to specify any new or altered Research projects to its insurers 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 relevant director of course or activity should advise the Insurance Officer at the earliest opportunity,

including details of insurances held by any external partner involved.

- 5.24 Any extensions required to University's existing insurance cover might result in additional premiums that need recharging to the appropriate department. The University's Insurance Officer can provide specific advice.
- 5.25 It is essential to refer to the University's policy on [Research Governance and Ethics](#) (intranet access only)

#### *Sources of Information*

#### *University Information*

[Insurance web pages](#) (intranet access only)

## SECTION SIX

### ORGANISING FORMAL ACTIVITIES FOR CHILDREN AND YOUNG PEOPLE AT THE UNIVERSITY

#### A GUIDE FOR DIRECTORS OF COURSES AND ACTIVITIES

- 6.1 When arranging any activities for groups of children and young people at the University, the Head of school/department, relevant manager or officer of the Students' Union must follow the relevant sections of this policy.
- 6.2 Heads of school/department should ensure that the relevant personnel engage in the early planning of activities to ensure appropriate contact with the appropriate officers of the University. It may take up to three months to complete the process where there is a need to recruit, interview, acquire references and satisfactory employment checks, and DBS clearance of employees and volunteers.
- 6.3 An example of a set of Protocols setting out the requirements for the organising, booking and running activities for schools and details of the responsibilities of all parties appears at the end of this section. It was originally produced by Aimhigher

#### *Director of Course or Activity*

- 6.4 A key appointment is the director of the course or activity, who will have specific responsibilities detailed in the various sections of this policy.
- 6.5 The director of the course 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 consent 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 (see Section Four);
  - (v) confirming that there is sufficient insurance cover for the activities;
  - (vi) ensuring 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 course or activity, it is essential to consider the nature of the contact making with the participants and the families before commencement. The following are important issues that need consideration.

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

However, the nature of each will vary according to the course or activity:

- 6.7 It is essential to be clear about what the child or young person is to bring and, perhaps more significantly, what the person is not to bring.
- 6.8 Families should receive relevant course details and the arrangements for contacting the director of the course or activity in an emergency. The protocols for early withdrawal need to be made clear.

### *Handover or Reception Point*

- 6.9 Where a child or young person will remain 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, including outlining the support arrangements.
- 6.11 Consideration should be given to preparing an information pack. The pack should include
- (i) relevant maps and plans
  - (ii) contact names and numbers and roles of adults
  - (iii) frequently asked questions
  - (iv) course or activity outlines
  - (v) arrangements relating to fire and evacuation
  - (vi) statement of expected conduct.
- 6.12 It is helpful to discuss the planned activities at an orientation session to address any fears and concerns.

### *Code of Conduct*

- 6.13 Where the activity or course 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 course or activity.
- 6.14 The Code of Conduct sets out what is expected and unacceptable behaviour. The Code needs to be written intelligibly for the age of the child or young person.

- 6.15 The child or young person must sign a copy once there has been an adequate explanation of the Code 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 course or activity until signing the Code.
- 6.16 There should also be a code of conduct when a child or young person is undertaking work experience (Section 8).
- 6.17 An example of a Higher Education Summer Camp code of conduct appears at the end of this section.

#### *Removal from a Course or Activity*

- 6.18 As a last resort, removing the child or young person from the course or activity may be necessary for serious misbehaviour. Any Code of Conduct should cover this eventuality.
- 6.19 Removal from University premises can only occur when arrangements are in place for the supervised collection of the child or young person. If such collection is impossible, the child or young person needs to be escorted home by a suitable adult.
- 6.20 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 Courses or Activities*

- 6.21 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*

- 6.22 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, Security and Health and Safety*

- 6.23 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
  - (ii) the arrangements for the escorting 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*

- 6.24 The following points need checking:
- (i) the exercise of control and supervision outside the classroom arena, particularly concerning:
    - (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*

- 6.25 Data protection provisions require the duty of confidentiality to the child or young person, not the parents, guardians or carers. A director of a course and activity should obtain the child's or young person's consent before releasing information to a parent or third party.
- 6.26 A director of a course or activity may consider it prudent to obtain consent from all the participants to release specific data to specified third parties.
- 6.27 A course or activity director can obtain advice from [the University Data Protection Officer](#). There is also an online [Data Protection Handbook](#) (intranet access only).

### *Training and Induction of Staff and Volunteers*

- 6.28 A director of a course or activity must make appropriate arrangements for the training and induction of staff and volunteers.
- 6.29 The nature of the training varies according to the course or activity and 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*

- 6.30 Where members of the University staff are *teaching* those under 18, they may need to be sensitive to any particular needs or difficulties such students may have. The teaching style and content need to 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*

University [Data Protection Handbook](#) (intranet access only)

## EXAMPLE OF AN 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.*

### **1. General organisation**

#### **1.1 Organisation of schools activities timetable**

- a) 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 concerning 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. Where a designated contact is 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 Administration Officer will keep a list of all activity provider contacts. It is the responsibility of partners of any changes to designated contacts.

##### **1.2.2 Attending schools/FECs**

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

##### **1.2.3 Activity providers**

- a) Activity providers will provide a named contact who will receive and process all school activities correspondence.
- b) Activity providers agree that they are responsible for ensuring that their list of school activities is current and any updates.

### **1.3 Cancelling events**

- a) Attending schools/FECs will inform activity providers in writing at least ten working days before the event start date should they need to cancel the attendance of any or all of their students booked on the event. It will enable activity providers to recruit target students from alternative schools/FECs to fill the 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 before an event:
- The year group attending
  - Ages of students attending
  - Number of attending students
  - The subjects 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 when booking events. Details of individual events and specific information will be agreed upon amongst all parties and sent to the attending school/FEC a minimum of two weeks before 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**

- Attending schools/FECs are responsible for arranging student transport to and from events unless otherwise agreed between participating partners.
- Attending schools/FECs agree that they are responsible for ensuring that the appropriate insurance for the transportation of students is in place.
- 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**

- 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.
- Activity providers are responsible for feeding back to the school/FEC's named contact on any student behavioural issues on the same or the next day.

## **Code of Conduct**

### 3.1 *Activity providers*

- Activity providers will provide a code of conduct specific to school/FEC students visiting for activities. It will include behaviour during travel to and from the institution.
- Activity providers must send the code of conduct to the school/FEC before each event. It must clearly state the following as a minimum:
  - Attending schools/FECs must comply with DCSF guidelines on the 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
- 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:.....

## EXAMPLE OF A 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 to participate 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 the 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 relating to 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 during their teaching or other work. 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 takes 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. It includes [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 following 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 Assistant Director (Admissions)) and on staff (which is the responsibility of the Director of Human Resources and Organisational Development). This section concerns only staff.
- 7.4 There are essential 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** might have done so had the individual not ceased the activity. There is [DBS Guidance on Referrals](#).
  - (iii) An increasing emphasis is placed on ensuring 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 the appropriate recruitment, training and management of relevant employees and students. Day-to-day management is essential in identifying unusual or concerning behaviour early and taking appropriate action.
- 7.5 As the lead DBS Signatory, the Director of Marketing and Communications undertakes the reporting to the DBS. When there is a need to consider a referral, the relevant head of school/department must immediately inform the Dean of Faculty (for students) or Director of Human Resources and Organisational Development (for staff).

### *Regulated Activity*

- 7.6 The current DBS [definition of regulated activity concerning children](#) an individual barred from working with vulnerable groups, including children, must not do, comprises, in summary:
- 7.7.1 **unsupervised activities**: teach, train, instruct, care for or supervise children, provide advice/ guidance on well-being, or drive a vehicle only for children
  - 7.7.2 work for a limited range of establishments ('**specified places**'), with opportunities 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).
- 7.7.3 **relevant personal care**, e.g. washing or dressing; or health care by or supervised by a professional
  - 7.7.4 **registered childminding**; and
  - 7.7.5 **foster-carers**
- 7.7 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 every day but not all day; every week but not every day; every month but only once a month. In this context, regulated activities involve contact with children carried out frequently (at least once a month), intensively (on three or more days in any 30 days) or overnight.

### *Checks with the Disclosure and Barring Service*

- 7.8 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](#).
- 7.9 The University has registered with the DBS. As a condition of registration, it has in place the required policies on recruiting ex-offenders and 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 from the Director of Human Resources and Organisational Development. There is a requirement to meet the requirements of the [DBS code of practice](#).
- 7.10 Those responsible for the recruitment of both members of staff and volunteers should be aware of when disclosures need obtaining and what level of disclosure is appropriate.

### *Types of Check*

7.11 There are three types of checks:

- 7.12.1 The **standard disclosure** details all criminal history: cautions, warnings, reprimands and convictions held on the Police National Computer, with the exception of the DBS filtering rule. **Standard disclosure** is available in respect of positions and professions within the terms of the Exceptions Order under the Rehabilitation of Offenders Act 1974.
- 7.12.2 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 involved in regularly caring for, training, supervising or being in sole charge of those aged under 18 or vulnerable adults.
- 7.12.3 **Enhanced checks with a check against the children and/or the adult 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. There is a check against both barred lists individual only if the job role requires 'Regulated Activity' with children **and** adults.

### *Requesting disclosures*

- 7.12 There is a need to request a disclosure when a member of staff or volunteer has regular contact with children or vulnerable adults.
- 7.13 Human Resources and Organisational Development make checks with DBS for staff and volunteers, authorised by the Head of School. The director of a course or activity must not apply for any checks.
- 7.14 It is important for a director of a course or activity to notify Human Resources and Organisational Development of the need to request 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*

- 7.15 The DBS issues certificates only to applicants.
- 7.16 The University does not receive a duplicate. There needs to be an effective means of undertaking the necessary certificate checks. It is essential to align them with the procedures for safer recruitment and monitoring.

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

- 7.17 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.
- 7.18 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 Education

[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

DBS publishes information about its work on its [website](#)

## SECTION EIGHT

### WORK EXPERIENCE FOR CHILDREN AND YOUNG PEOPLE AT THE UNIVERSITY

#### *Health and Safety Requirements: Risk Assessments*

- 8.1 All University activities should be subject to suitable and sufficient risk assessment(s) under the University [Health and Safety Policies](#) (intranet access only) to meet its duties under the [Management of Health and Safety Regulations 1999](#).
- 8.2 The member of staff organising the work experience is responsible for ensuring that risk assessments involving children and/or young people are in place, which takes account of the higher duty of care and for ensuring that safety precautions detailed in the risk assessments are implemented and complied with at all times by all staff. Reference needs to be made to Section Four, Health and Safety. It is to ensure statutory restrictions regarding activities that can be carried out by children and young persons in the workplace are adhered to.
- 8.3 The [Management of Health and Safety at Work Regulations 1999](#) section 19 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 how it is handled
  - (v) the organization of processes and activities
  - (vi) the extent of the health and safety training provided to young people
- 8.4 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.
- 8.5 Advice on the production of any risk assessment is available from the University Health and Safety Manager.

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

- 8.6 It is particularly important the manager or supervisor identifies 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 make reasonable adjustments.



- 8.7 The person arranging the work experience must seek information from the school, University or another sponsor of any disability or other special requirements the child or young person has.
- 8.8 It is essential 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*

- 8.9 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 the University staff responsible for the work experience should discuss and explain the content of this Code. If the need arises, the Code should also be read to the young person concerned.
- 8.10 A copy of the Code must be available to the school, University or other sponsors.

### *Sources of Information*

External Information

### **Department for Education**

[16 to 19 study courses: work experience](#)

### **Health and Safety Executive**

[Young people and work Experience](#) INDG 364

## SECTION NINE

### EMPLOYING CHILDREN AND YOUNG PEOPLE AT THE UNIVERSITY

#### *Requirements relating to the employment of young people*

- 9.1 There are several restrictions affecting the employment of children and young people. Most statutory restrictions related 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 taken must be reasonable, giving due regard to the nature of the training or study and the employer's needs.

#### *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 after that
  - A minimum rest period of 12 hours during every 24-hour period
  - Two days off per week
  - A minimum 30-minute rest break after 4½ hours of continuous work

#### *Health and Safety Requirements: Risk Assessments*

- 9.5 All University activities should be subject to suitable and sufficient risk assessment(s) under the University [Health and Safety Policies](#) (intranet access only). It is to meet its duties under the [Management of Health and Safety Regulations 1999](#).
- 9.6 The member of staff organising the work experience is responsible for ensuring that risk assessments involving children and/or young people are in place, taking account of the higher duty of care. They must ensure that safety precautions detailed in the risk assessments are implemented and complied with by all staff. It ensures adherence to statutory restrictions regarding children and young persons in the workplace (See Section Four, Health and Safety).
- 9.7 The [Management of Health and Safety at Work Regulations 1999](#) section 19 require a separate risk assessment, which takes account of:
- the inexperience, lack of awareness of risks and immaturity of young people
  - the fitting out of the workstation and area of work

- the nature, degree and duration of exposure to physical, biological and chemical agents
- the form, range and use of work equipment, and how it is handled
- the organization of processes and activities
- the extent of the health and safety training provided to young people

9.8 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.

9.9 Advice on the production of any risk assessment is available from the University Health and Safety Manager.

#### *Managerial Responsibility*

9.10 The Head of school/department is responsible for ensuring the implementation of the requirements set out above, including the undertaking of any risk assessment.

#### *Sources of Information*

External Information

#### **Department for Education**

#### *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 the capacity to enter into a contract unless the individual is aged 18 or over. 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 to be incorporated into it. It is vital to bring the terms to the applicant's attention BEFORE making the offer of a place. In essence, any terms must be fair and reasonable and expressed in a way intelligible to the child or young person.
- 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 The relevant Head of school/department (e.g. Accommodation Manager) should obtain a guarantee from the parent, guardian or carer of the child or young person for any fee or charge. It is important to align this 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 our information about our approach BEFORE making an offer of a place on the course.
- 10.7 Further advice on billing arrangements is obtainable from the Director of Finance.

## SECTION ELEVEN

### COMPLAINTS MADE BY REGISTERED STUDENTS UNDER THE AGE OF 18

- 11.1 The University [\*Student Complaints Procedure\*](#) should be followed for complaints made by registered students.

- 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, with the explicit and written consent of the individual concerned, will notify the parents, guardians or carer in writing and keep them informed of the progress of the complaint.

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 can understand the nature of the process and confirms the agreement in writing beforehand.

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

- 11.1 As a child approaches maturity, the duties of the parent, guardian or carer diminish. It is why the critical question to ask concerning any child is what understanding and maturity the child has. There can be no doubt that a child with such sufficient understanding may give valid consent to the use of confidential information. A child has rights in the law of confidentiality (and under Article 8 of the European Convention on Human Rights), and 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 agreement
  - Safeguarding
  - Ethics approval
  - Good practice in the design and implementation of the project
  - Management Information
  - Insurance

#### *Informed agreement to participate in the research*

- 12.4 The first question to ask is who may give agreement to take part in the research. A parent's power to provide a valid agreement derives from a parent's duty of care for the child, especially relating to confidential information. Should a child have sufficient understanding and intelligence to understand what they are consenting to, then the child can give a valid agreement. 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 necessary to honour those rights in this situation.
- 12.5 As a child approaches maturity, the duties of the parent, guardian or carer and, therefore, responsibilities concerning the child diminish. It is why the critical question to ask concerning any child is what understanding and intelligence the child has. A child with such sufficient understanding and intelligence may agree to the use of confidential information relating to them.
- 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 needs to be given to
- safeguarding issues
  - ethics approval
  - data protection
  - insurance

### *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 When considering any research involving children and young people, it is essential to obtain appropriate ethical approval in accordance with the University's arrangements for obtaining ethical consent in those situations.
- 12.10 The process for obtaining ethical approval is set out in [A Quick Guide to Ethical Review](#).

### *Data Protection*

- 12.11 The researcher should have in place procedures regularly monitored, for the safe storage of research data, including 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 storing sensitive material.
- 12.13 The Information Commissioner noted that failure to have such procedures might breach the [UK General Data Protection Regulation](#) and the [Data Protection Act 2018](#).

### *Health & Safety*

- 12.14 Please refer to section 4 of this Policy concerning Health and Safety

### *Insurance*

- 12.15 Please see section 5 of this policy concerning Insurance, particularly the subsection regarding research

### *Sources of Information*

- (a) University Information

### [Research Governance and Ethics](#)

(c) External Information

**British Educational Research Association**

[Ethical Guidelines for Educational Research, fourth edition \(2018\)](#)

**British Psychological Society**

[Code of Ethics and Conduct \(2018\)](#)

**British Sociological Association**

[Guidelines on Ethical Research](#)

**Department for Education**

[Safeguarding children across services: messages from research](#)

**Health & Safety in Higher Education Institution**

[Guidance on Responsible Research – Managing Health and Safety in Research](#)



## SECTION THIRTEEN

### GUIDANCE RELATING TO CHILDREN AND YOUNG PEOPLE ON UNIVERSITY SITES OTHER THAN FOR UNIVERSITY COURSES AND ACTIVITIES AND EVENTS BOOKED THROUGH CONFERENCES AND EVENTS

- 13.1 This guidance relates to children and young people on University property when they are not part of (i) a University organised event specifically organised for them or (ii) an event booked through Conferences and Events where arrangements are in place for the safeguarding of children and young people.
- 13.2 The guidance relates to situations where children and young people visit casually, including for demonstration purposes, as part of a course 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. Notice needs taking of the requirements of the Equality Act 2010. The Act introduced protection from discrimination for students during pregnancy and maternity by extending the protection for women in employment to higher education. The Equalities Challenge Unit provided advice for universities. This guidance outlines how institutions can ensure students are not discriminated against on the grounds of pregnancy or maternity.
- 13.4 Section 17 of the Equality Act expanded the protection from discrimination on the grounds of pregnancy and maternity. Protection already existed for women in the workplace and vocational training. The Act extended it to women outside the workplace. In doing so, the Act specifically mentions the higher education sector. Under the Act, discrimination can occur against a student because of pregnancy or because of giving birth if:
- the student is treated unfavourably because of her pregnancy
  - within 26 weeks of the day of giving birth, there is unfavourable treatment because the student gave birth; this also applies in cases of miscarriage, stillbirth and neonatal death, provided more than 24 weeks of the pregnancy has elapsed
  - unfavourable treatment because the student is breastfeeding and the child is less than 26 weeks old; if the child is more than 26 weeks old, unfavourable treatment because of breastfeeding is likely to constitute sex discrimination
- 13.5 Outside the 26 weeks, the student may be protected by the sex discrimination provisions
- 13.6 The implications for the University of children in classes and other areas are wide-ranging: insurance, health and safety, assertions made by students that their courses were interrupted or compromised by the presence of children within teaching areas.
- 13.7 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. Therefore, the key is undertaking and recording appropriate risk assessments through discussions with the student.

- 13.8 Occasionally, children visit the University as a part of the learning experience of University students. In these cases, those initiating such arrangements must refer to Section Four Health and Safety and undertake a sufficient risk assessment concerning the significant risks involved, supported by written procedures outlining how to reduce those risks to the lowest possible level. Such risk assessment should include:
- level of supervision
  - emergency procedures
  - suitability of teaching rooms, equipment etc.
- 13.9 Notwithstanding the advice of the University in recent years, there is a growing awareness that the number of children on site is increasing, including children taken into lectures.
- 13.10 Where an adult brings a child to the site for whatever reason, the responsibility for appropriate supervision rests with that adult.
- 13.11 Heads of school/department should make all practical arrangements to emphasise the need for appropriate supervision when children are on the premises.
- 13.12 Staff members' children are regarded the same as the children of students and visitors.

## **External Information**

### **Equality Challenge Unit**

[Student pregnancy and maternity: implications for higher education institutions](#)

## 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, young people and their families.
- 14.2 Although digital technology has vastly increased the 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 photograph's appropriateness and protect the individual's identity.
- 14.3 The following guidelines are based on the work of [Act Now](#), and 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 images of children and young people. Such images are subject to a separate University policy.

### Consent

- 14.6 The UK General Data Protection Regulation and the Data Protection Act 2018 affect the use of photography since an image of a child or young person as it is personal. 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. The GDPR is clear that an indication of [consent](#) must be unambiguous and involve an explicit affirmative action (an opt-in). It specifically bans pre-ticked opt-in boxes. It also requires distinct ('granular') consent options for different processing operations. Consent should be separate from other terms and conditions and not be a precondition to signing up for a service. Consent can be withdrawn at any time.
- 14.7 Because media opportunities can sometimes present themselves at short notice, it is helpful to have consent confirmed/refused in readiness. Should photographs likely be taken during the course or activity, it may be convenient for the director of the course or activity to seek consent before its commencement. It is vital to obtain consent if the intention is to seek publicity for the course or activity via either the media or University publications.
- 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 photographic images are intended for this purpose, it is essential to gain specific consent, which may be obtained as part of the consent concerning photographs or videos.
- 14.10 For those under 16, drawing attention to the importance of ascertaining the child's views when obtaining consent is essential.
- 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 course or event.

#### *Planning photographs of Children and Young People*

- 14.13 Images and details of children and young people should not be published together. It is because they present the risk 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 important to include positive images of individuals from different ethnic backgrounds and 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 essential to:
- Use the minimum information. Accompany a picture with the course title or activity description rather than personal names.
  - Avoid fully naming a child or young person in any published text, whether in University publications, websites or 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 the photographer automatically enjoys as the creator of the work to prevent other people from exploiting the work by controlling how other people use it.
- 14.19 Before using a photograph supplied by a third party, it is essential 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 essential to ask the third party to guarantee that all relevant permissions 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 takes photographs. Parents, guardians and carers, as well as the children and young people, need to be aware of the potential risks. They can then decide whether to agree to their children being featured in the press and whether their full name should accompany the photograph.
- 14.23 How the press use images is controlled through relevant industry codes of practice and 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 to be obtained before a child or young person appears in a video. Therefore, if photographic images are intended for this purpose, it is essential to gain specific consent, which may be obtained as part of the consent concerning photographs.

### *Websites*

- 14.25 The use of photographic images on websites is an area that 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 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). It means that the area in which there is the use of the webcam must be well signposted. People must know that the webcam is there before entering the area to consent to be viewed in this way. Children and young people need to consent, as well as the parents, guardians or carers of all the affected children and young people.

- 14.28 In gaining consent, it is essential to explain

- (i) why the webcam is there
- (ii) the use to which the images will be put
- (iii) who might want to look at the pictures
- (iv) the security measures are in place to restrict access

- 14.29 Webcams may pose particular risks, which need to be considered when planning activities.

#### *Parental Photography*

- 14.30 Parents, guardians and carers may take photographs or make a video recording for their private use. It includes any University events. They may not take photographs or make a video recording for anything other than their personal use (e.g. to sell videos of a University event) without the explicit consent of the other parents whose children may be captured on film. Without this consent, the UK General Data Protection Regulation may be breached.

#### *Photographs taken by Other Third Parties*

- 14.31 It is essential 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 course or activity.

#### *The Storage of Photographs*

- 14.32 Photographs need treating in the same way as any other data. It is essential 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 takes photographs. If this is the case, assessing the validity of the photographer or agency involved is vital. It includes establishing the checks or vetting undertaken. There need to be appropriate levels of supervision to safeguard the 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?](#) (Archive Copy)

### **NSPCC**

[E-safety for schools](#)

[Guidance on helping keep children and young people safe online](#)

### **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.)

**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 course at the University. When you have read the letter, you should fill in and return the attached form 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 course 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 course.

Please complete the attached form. If you wish to discuss the matter, please contact the course 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 events. Children will often appear in these images, which may appear in local or national newspapers or on televised news courses.

To comply with the UK General Data Protection Regulation, 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 the conditions for the 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. You can withdraw your consent at any time, and you do not need to give a reason.
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, or 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 UK General Data Protection Regulation 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 events. Individuals will often appear in these images, which may appear in local or national newspapers or on televised news courses.

To comply with the UK General Data Protection Regulation, 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.

Please  
circle your  
answer

- |   |          |
|---|----------|
| 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 the 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. You can withdraw your consent at any time, and you do not need to give a reason.
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, or 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 UK General Data Protection Regulation 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 promote their welfare. Parents should receive 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 not followed. This might be made clear through inclusion in the parent consent form.
- 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 for their travel, their reception on arrival in the UK and 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 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.
- 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\*](#) (January 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, both administrative and teaching, need to be aware of the procedures relating to the admission of under-18s. They are to be able to guide children and their parents within the limits of the information available and know to whom to refer them when this information is unavailable.
- 15.8 The Admissions Agency is to consider whether the student or parent is making a booking or application directly or through an agent and the impact this will have on the flow of information, e.g. whether agents receive suitably briefing on the issues.

- 15.9 Parents and agents will rely on prospectuses and websites for information, and there is a need to consider this 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 Sufficient information must be provided at the offer stage concerning their child's course, accommodation and leisure activities. It is to keep parents informed about the detail of arrangements before signing any contracts. The information may be accessible on the web, in handbooks or other documents.
- 15.11 There is a need to provide a separate copy for the parents and the child, so the parents can access a copy while the child is away. It is also good practice to send parents a pre-arrival pack with further information about the course and activities available on- and off-site.

### ***The University as an Adult Environment***

- 15.12 The offer letter from the Admissions Agency sets out the extent of the responsibility the University has concerning Under 18s and the supervision that can realistically provide, considering the kind of educational experience.
- 15.13 Parents of international students may have very little knowledge of the education system in the UK. They 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. It needs to make clear to parents the amount of freedom their child will have. Attention must be drawn to the general information provided for all students about the security measures and support available on-site and in accommodation. It enables them to decide 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, including student accommodation.

### **UK Guardians**

- 15.15 Where the child is on a longer course (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 or give permission for emergency medical treatment. It is appropriate to take account of the date the child turns 18, as the requirements will no longer apply.
- 15.16 Parents need to understand that they are responsible for their children's welfare when staying with a UK guardian, not the University. The University should request parental permission to contact the UK guardian in the event of an emergency and to send copies of information concerning students to their 'guardians' and parents.
- 15.17 The University is unable to assist parents in finding a suitable guardian. For those families who do not have friends or relatives in the UK, a list of accredited agencies is obtainable from:

The Association of Educational Guardians for International Students (AEGIS)  
66 Humphreys Close  
Randwick  
Stroud  
GL5 4NY  
Tel/Fax: +44 (0)1453 755160  
Email: [aegisuk@btopenworld.com](mailto:aegisuk@btopenworld.com)

The list is also available at [www.aegisuk.net](http://www.aegisuk.net).

UK Guardians provide a guardianship service. The contact details are:

UK Guardians  
22 Shelley Close  
Christchurch  
Dorset  
United Kingdom  
BH23 4HW

Email: [info@ukguardians.co.uk](mailto:info@ukguardians.co.uk)

Telephone: +441425 529118

### ***Insurance***

- 15.18 It is good practice to advise on the desirability of taking out insurance, and to make clear, for instance, what medical costs the NHS would cover for students, and what costs they should expect to have to pay for.
- 15.19 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, and personal liability.

### ***Visa and immigration requirements***

- 15.20 Information sent to parents must include information on visa requirements, including details of the likely length of time needed to apply and the documentation required.
- 15.21 The Compliance Manager in Admissions provides immigration advice to students (prospective, current and recent graduates) and their immediate dependants.

### ***Disabilities***

- 15.22 It is essential to follow up on any disabilities mentioned on the application form with Student Support. It is to identify available support and ensure it will be in place when the child arrives. It is essential to note the child may not have coped without the support of the family before. Discussions will be necessary to identify the support needs. Students and their families may be used to different systems of support and different cultural attitudes to disability.

- 15.23 The Admissions Agency should identify areas where it may be required to fund equivalent provisions. It is to ensure international students with disabilities do not receive less favourable treatment and that parents are aware of additional costs at the earliest opportunity.
- 15.24 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***

- 15.25 The Admissions Agency is to ensure special and appropriate arrangements for the arrival of international students under 18. These arrangements need to be agreed upon in conjunction with the parents.
- 15.26 Should the parent accept responsibility, through a signed statement, for accompanying the student to the reception area in the University, the following arrangements do not apply.
- 15.27 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 permitting the child to travel
  - the point of departure and details of departure, including times and any connection details
  - the point of arrival, and the expected arrival date and time
  - the name of the person with whom they are staying (homestay or residence)
  - confirmation of offer letter from the University (including the CAS for overseas students)
  - the name and contact details of the University contact
  - the transport arrangements from the airport or other point of entry
  - 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)
- 15.1 The Admissions Agency will ensure the parents have details of
- what meet and greet arrangements the University provides
  - how to book these
  - the costs involved
- 15.28 It needs to explain that if the service is unavailable at all times, the parents are responsible for making appropriate arrangements outside the set times.
- 15.29 Arrangements must be in place to meet all under-18s travelling without an adult at the airport or other entry points. Where possible, this will be by an Admissions Agency representative. Alternatively, there may specific arrangements made in advance for meeting under 18 students by a local guardian appointed by the parent, guardian or carer. The University requires written authorisation in advance of departure for this alternative arrangement.



- 15.30 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 child's arrival by a specific date before their arrival. The parents are responsible for any additional costs incurred by the University in assisting a child because of a failure to notify.
- 15.31 The Admissions Agency will provide unaccompanied children entering the UK with an emergency contact number to call if they encounter problems at immigration.

#### Parental Responsibilities

- 15.32 The Admissions Agency is to make clear to parents that they have a responsibility to ensure 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
- 15.33 In the case of written information, the parents should provide it in an English language translation wherever possible.

#### Taxis

- 15.34 Where it is necessary for the Admissions Agency to arrange or collect the child, the Admissions Agency will request the taxi company to provide written confirmation that an enhanced DBS check was undertaken for their taxi drivers.
- 15.35 Taxi companies should use chaperones for those students under 18 travelling alone as a precaution for students and protect drivers against false allegations of abuse. The arrangements need clarifying with the taxi company.

- 15.36 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. There must be an agreement on the contractual terms before the student's arrival. There is an expectation that the parents would meet the taxi cost as part of the agreement.

## SECTION 16 The Prevent Duty

[The Counter-Terrorism and Security Act 2015](#) is part of the Government's strategy to reduce the terrorist threat in the UK. It made **every** university act to prevent the risk of people being drawn into terrorism. It is sometimes called the [Prevent duty](#).

This briefing provides information on the Prevent duty. It outlines what we do as a University.

### What does the Government require?

The [Prevent Duty Guidance for Higher Education institutions in England and Wales](#) makes it clear all universities have to act.

By law, we have to demonstrate we have arrangements to safeguard people in our community from being drawn into terrorism. We are accountable for the actions we take.

### What are radicalisation and extremism?

**Radicalisation** is the process by which a person comes to support terrorism and forms of extremism leading to terrorism. This extremism can be about political matters, such as right-wing extremism, as well as religious matters.

**Extremism** is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of our armed forces, whether in this country or overseas.

You can read more about it in our [briefing note](#).

### What is the University's approach?

Our approach is to respond within the spirit of our [mission and values](#).

We are committed to freedom of speech within the law to encourage open and reasoned debate. We respect freedom of thought, conscience and religion. However, freedom of thought, conscience and religion is not absolute. We may need to intervene where necessary to protect the rights of others.

We take account of our [equality and diversity policy](#). We aim to provide a fair environment where everyone receives dignity and respect. We intend to sustain a culture free from discrimination linked to any personal characteristic.

In meeting the duty, we emphasise personal well-being in handling incidents and reports.

We provide a [Briefing for members of staff](#).

### **What are we doing to safeguard students?**

We want to support all our students in their studies. We do this as part of our existing processes. We have established a [cause for care and concern process](#) (intranet access only). It allows us to support students through our [Student Support, Health and Wellbeing Services](#).

We have other extensive pastoral and support services. It includes the [Accommodation Team](#), [personal academic tutors](#), [Chaplaincy](#), and [Estates and Facilities Services](#). We want to support any member of the University facing difficulties. We have means for referring a student for support. It is for any issue of concern. It is not just to meet the Prevent duty. We aim to help support the wide range of student requirements.

### **What do I do if I have a concern about myself?**

You may have a concern about yourself. If you do, you can speak to your [personal academic tutor](#). You can also talk to our [Support Services](#). You can contact us by

Phone: 01227 782675

Email: [studentwellbeing@canterbury.ac.uk](mailto:studentwellbeing@canterbury.ac.uk)

They will be able to advise you on what support is available inside and outside the University.

You can also use our [Report + Support](#) reporting system. You can provide contact details so you will get a response.

What we want to do is to support you.

### **What do I do if I am concerned about someone else?**

It is essential not to ignore a concern about another person.

Perhaps you have noticed a behaviour change; are they becoming withdrawn or acting differently? Maybe it is something the student has said that's worrying you. You might see if someone is experiencing difficulties.

You can check with others who may have noticed something to see if they share your concerns.

Sometimes you can speak to the person to see if they need help. You can suggest the person speaks to their [personal academic tutor](#) or our [Support Services](#).

You might not want to talk to the person. It is understandable. If you have any concerns about the safeguarding or wellbeing of anyone in our community, please email [safeguarding@canterbury.ac.uk](mailto:safeguarding@canterbury.ac.uk).

You can also use our [Report + Support](#) reporting system. All staff, students and visitors to our campus can report something either anonymously or with contact details so you will get a response.

The team may be able to offer support and guidance to the person. What we want to do is to support the person if there is a problem.

### **Will the University monitor my emails and web surfing?**

We do not monitor your use of websites or [emails](#).

We use filter websites. We use filters to block pages that threaten our IT systems. We also use filters to block illegal pornographic websites and illegal websites concerned with terrorism and radicalisation.

We have [Core Regulations for the use of IT](#). Only if there is a breach of the Core Regulations will we investigate. Where appropriate, we will take action and contact the person concerned.

### **What is the University's position on academic freedom, freedom of speech and external speakers?**

We have a policy on external speakers to support freedom of speech within the law. It means we have appropriate [procedures for organising events](#). Even when a speaker talks on a controversial topic, we support freedom of speech within the law. Our procedure integrates with the Students' Union policy.

We have processes for [research governance and ethics](#). It protects researchers and students undertaking sensitive research of all kinds.

We guarantee [academic freedom](#) within the law for staff members in our Staff Code.

### **How is the equality and diversity dimension taken into account?**

We appreciate the [equality](#) dimensions. We recognise concerns about stereotyping. Much depends on what individual members of staff do when working with students.

We provide training of staff. This training includes conscious and unconscious bias and the need to take a holistic approach to the person.

### **What are the arrangements for the oversight of the Prevent duty?**

The [Office for Students](#) (OfS) monitors our compliance with the [Prevent duty](#). OfS must report to the government on what all universities do to meet their duty.

In addition, Apprenticeships are inspected by OFSTED.