



# **Under 18s Safeguarding Policy**

**Owner: Head of Student Services**

**Approved by: Senate on 03<sup>rd</sup> October 2012**

**Version: 1.3 Updated Spring 2018**

**Version 1.4 Typographical amendments June 2019**

## Under 18s Safeguarding Policy

### 1. Aims and objectives

This policy sets out the principles and procedures adopted by Regent's University London (Regent's) to ensure the safety of people under the age of 18. In this document such people are referred to as children (under 16) and young people (at least 16 and under 18). It covers children and young people who are students of the University and others who are on University premises or under the care or supervision of our staff and/or students.

Regent's has a duty of care to all of its staff and students; the University has an enhanced duty of care owed to those under the age of eighteen. Also, the Occupier's Liability Act 1957 states that an occupier must be prepared for children to be less careful than adults.

### 2. Guiding principles

**The Under 18s Safeguarding Policy is concerned primarily with ensuring the people under the age of 18 on campus are safe.**

### 3. Policy statement

Regent's University London will provide, as far as is reasonably practicable, an environment that is safe from harm for children and young people; and ensure that procedures are in place for dealing with allegations of child abuse.

Children and young people may be present on Regent's premises or under the supervision or direction of Regent's staff in the following circumstances:

- as students of Regent's; brought on site by parents and/or friends, who may be staff and/or students; participating in a summer school or other activity organised by a group within Regent's;
- participating in or otherwise present because of an event or activity organised by a third party which has hired Regent's premises for the purpose (e.g. summer language school, private function, etc);
- attending Open Days either as potential applicants or as part of a family group, attending interviews for admission;
- using music, sports or other facilities;
- research subjects;
- work experience placements or temporary employees;
- living in Halls over a holiday period (e.g. as part of a school party)
- living in Halls as students;
- as a visitor for any other reason.

In some, but not all, of these situations the children and young people may be accompanied by an adult, such as a parent, teacher or carer who will be responsible for their safety.

#### **4. Implementation of this policy**

All staff at Regent's are expected to be responsible for implementing this policy. This policy will be available to all staff and students.

#### **5. Procedure and process**

##### **Activity organisers - external**

Regent's University London does not take responsibility for children and young people who come on to the campus to participate in activities arranged by non- Regent's organisations and/or individuals. A contract or other form of agreement must be in place for all such activities. This agreement must: include a standard disclaimer clause relating to children and young people, obtainable from Regent's University London Company Secretary;

Regent's require;

- the organisers to provide a written risk assessment for approval by Regent's prior to the activity taking place; (see Appendix 3)
- include an assurance that all adults involved in the activity have appropriate DBS checks;
- include a requirement for the organisers to assure Regent's that their insurance covers their contractual responsibilities.

##### **Activity organisers - internal**

The responsibilities of the person in charge of any Regent's—organised activity for children and young people will include:

- establishing and implementing health and safety systems to ensure the children and young people are in a safe environment at all times when on Regent's premises; (see Appendix 2)
- producing an appropriate and adequate written risk assessment to be approved by the Health and Safety Officer; (see Appendix 3)
- gaining appropriate consents from parents, guardians and carers;
- contacting the Regent's Company secretary to ensure that there is appropriate insurance cover in place for the activities that are planned
- ensuring that the children and young people involved are adequately supervised for the duration of the activity by appropriately qualified supervisors.

##### **Admissions**

Whenever a young person is admitted to Regent's, Admissions will alert the relevant Faculty, and the Head of Student Services who will ensure that appropriate procedures and a programme of support are put in place until the young person is 18.

##### **Allegations of abuse**

Any allegations of abuse or concerns that a child or young person may be being abused must be directed immediately to the Head of Student Services or, in his/her absence, to another designated person (see Child Protection Coordinator section below).

##### **Alcohol**

Staff in University-managed bars will be provided by the Head of Student Services or nominee, with a list of students who are under 18 to prevent, where possible, under-age consumption of alcohol.

**Child protection co-ordinator**

Regent's has designated the Head of Student Services as Child Protection Coordinator. The Coordinator may designate other members of staff to act in his/her absence and on his/her behalf where appropriate.

**Children of staff and students**

There may be occasions when it is unavoidable for staff or students to bring their own children and young people on to the campus. In these circumstances the staff member or student concerned must accept full responsibility for the direct supervision and welfare of the children and/or young people involved throughout their time on campus. They should be aware that there are some intrinsically hazardous areas on the campuses, e.g. staircases. Children and young people must not be taken into laboratories, studio spaces or the gym. (See also the section on Computer Use below).

**Computer use**

Regent's University London's "Electronic Communications and Monitoring Policy" prohibits use to access sites that are "obscene, indecent or that others might reasonably find offensive". However, there are no physical restrictions on access and, hence, appropriate supervision must be given if children and young people are allowed to make use of computers.

**Disclosure and Barring Service (DBS) checks**

All Regent's staff and students who supervise or who have substantial regular, **unsupervised** contact with children and young people must have appropriate DBS checks before they undertake these activities. Such checks are to be organised via the HR department for Regent's staff. Organisers of any activity which may involve such contact with children and young people should contact the Regent's Company Secretary.

**Employment and work experience**

Where the University wishes to employ a young person, the manager must undertake a risk assessment, prior to making an appointment, in relation to the duties, responsibilities and the working environment and seek advice from Human Resources in relation to any special arrangements, training or other support to be put in place.

If Regent's offers to provide work experience placements for children or young people induction training and risk assessments must be carried out by a supervisor in the host department or office within Regent's.

Induction training should be carried out by the appropriate supervisor with all new work experience students employed by Regent's. Any further training required to ensure that the work experience student is competent to safely use equipment should be arranged by the work experience student's supervisor.

A risk assessment must be carried out by their designated supervisor once a work experience student has been placed at Regent's University London. (see Appendix 2)

The Management of Health and Safety at Work Regulations 1999 place a legal obligation on the University to ensure that young persons employed by the University or who are at the University as a work experience placement are protected from any risks to their health and safety which are a consequence of their lack of experience, or absence of awareness of existing or potential risks, or the fact that they have not yet fully matured.

A child or young person must not be engaged in any activity which:

- is beyond her/his physical or mental capacity;
- involves harmful exposure to agents which are toxic or carcinogenic;
- involve harmful exposure to radiation;

- involve the risk of accidents which it may reasonably be assumed cannot be recognized or avoided by young people owing to their insufficient attention to safety or lack of experience and training; or in which there is a risk to health from extreme heat or cold, noise or vibration.

None of the above however may be used legally to prevent activity of a young person who is not a child i.e. someone between 16 and 18 years old where:

- it is necessary for her/his training;
- the young person will be supervised by a competent person; or
- any risk will be reduced to the lowest level reasonably practicable.

Guidance for specific sectors (e.g. catering, construction work) should be consulted, as some additional restrictions may be applicable. For example, engineering industry guidance makes stipulations on the ages of people allowed to operate some types of machinery or plant. In any such case, the Health and Safety Officer must be consulted.

### **External volunteer and work placements**

Those within Regent's University London responsible for arranging for any member of Regent's to undertake volunteer or work placements with outside bodies that might entail involvement with children, young people or vulnerable adults should ensure that those who are sent comply with any requirements of the receiving/host organisation.

### **Insurance**

Regent's University London's insurance covers most of the risks likely to be involved in activities involving children and young people. However, activity and event organisers should contact the Regent's University London Company secretary for confirmation of this.

### **Photography / film**

Written consent to take and use images of children and young people should be obtained prior to the taking of photographs and/or video footage. Parents/guardians must be made aware of when, where and how the images may be used and their intended audiences in order that they can give informed consent.

### **Residents in halls**

Children and young people may be resident in Halls either as students studying at Regent's University London, or as part of a school party attending a summer school or educational visit provided that the organisers have made the necessary protection arrangements for children and young people. Children and young people residing in Regent's University London Halls will be required to identify a nominated adult (typically parent or legal guardian) who is in loco parentis to the child or young person. The child or young person must also consent to the University providing personal data to the nominated adult and to contacting the nominated adult in the event of emergency.

Students are permitted to allow a child or young person to stay with them as a guest in residential accommodation provided that the relevant member of Student Services is first consulted.

In the case of children and young people residing in Halls for the purpose of a short-term activity such as attending summer schools, educational visits or for any other specified activity, the risk assessment is the responsibility of the event organiser. The relevant member of Regent's responsible for confirming such a booking should ensure that a copy of the risk assessment is provided to them and should consult with the University Health and Safety Officer in any case of doubt or difficulty.

For children and young people residing in Halls for periods of over two months, the Head of Student Services of Regent's University London or nominee will contact the student within the first week of the student's academic year to arrange an appointment to ascertain how the

student is coping with the transition into University life, and will arrange follow-up meetings. The Head of Student Services will identify staff that may come into contact with the student and decide if a CRB check will be necessary on those members of staff.

Residential accommodation for students under the age of 18 will be as far as is possible grouped within a designated Hall. Hall Reps will be the subject of CRB checks, and a Residential Warden will be located on campus.

Regent's University London Student Services will inform the nominated adult if the child or young person is in arrears with their accommodation fees or breaches the Licence Agreement.

The child or young person must sign a new agreement with the Accommodation Office as soon as they reach the age of 18. This contract will be in the student's own right and so notification to the parent or carer of arrears or breaches of the agreement need not continue.

Regent's University London is not in loco parentis and therefore will not monitor how the student spends leisure time, manage their finances, or intrude unnecessarily into their daily lives or on their reasonable privacy.

Promptly inform the nominated adult on the student's accommodation application form if accommodation staff become aware of and/or are concerned about the student's health or involvement in an accident but only in consideration of normal NHS practice and procedure concerning medical confidentiality

Inform the nominated adult if a student has been involved in a criminal offence

Treat sympathetically any requests for a change of room within Regent's University London accommodation (always subject to availability and suitability).

Ensure that students are aware of who to contact in case of difficulties, and ensure that students have means of ensuring confidentiality where they wish it. The University will encourage students to involve a parent where appropriate and will respect a student's request for confidentiality wherever possible.

## **6. Measurement of the policy's success**

The measurement of the policy's success is measured by the amount of complaints that are received by the Head of Student Services.

## **7. Monitoring of the policy**

The Head of Student Services will add a section to their regular report to the University Senate Student Experience Committee on the number of under 18 year old students and via liaison with the Campus Health and Safety Officer the number of risk assessment made under the guidelines contained in this policy.

## **8. Review of the policy**

This policy is reviewed on an annual basis by Senate.

## **APPENDIX 1**

### **STAFF GUIDELINES**

Staff working with under 18s and young people should:

- treat all under 18s equally, and with respect and dignity at all times;
- wherever possible, meet with under 18s in an open environment, avoiding situations in which an adult and an under 18 are alone. If a one-to-one meeting / interview is necessary, it should take place in a room with an open door or with visual access;
- do not provide personal telephone numbers or addresses to under 18s; ensure that there is no physical contact with them, avoid inappropriate familiarity, do not discuss matters of a sexual nature;
- never take any individual under 18 to the home of a member of staff or volunteer;
- never promise that a conversation will be kept confidential, since it is impossible to guarantee such confidentiality

## **APPENDIX 2**

Risk assessments for work experience students at Regent's should include as a minimum reference to the:

- Inexperience, lack of awareness of risks and immaturity in the case of young persons;
- fitting-out and layout of the workplace and workstation;
- nature, degree and duration of exposure to physical, biological and chemical agents;
- form, range and use of equipment and the way in which it is handled;
- organisation of processes and activities;
- extent of the health and safety training provided or to be provided to the work experience student.

### **APPENDIX 3**

Risk assessments produced by Internal and External activities' organisers, where there will be participants under the age of 18, should include as a minimum the following:

- Identify the organisation of processes and activities
- Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups
- Identify any potential risk areas and detail action to prevent the risk occurring
- Identify any situations where a Disclosure and Barring Scheme (DBS) check might be required.