

Code of Practice concerning under 18 year olds

Summary description: This Code of Practice sets out the University's guidelines for the safeguarding and duty of care arrangements for under 18 year olds.

Scope: All staff and external bodies.

With effect from: September 2022

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This document is available in alternative formats from the Committee Section

Approved by: USEEEC

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Reference to any superseded policy/amalgamations: not applicable

Relevant legal framework: Not applicable

Equality Analysis: Not applicable

Freedom of Information

This policy is publicly available through the University's Publication Scheme under the Freedom of Information Act 2000.

Other professional standards reference points: Not applicable

The following terms are used in this policy

Mandatory Denoted by the word **must** - there is no discretion whether to take the action in question.

Advisable Denoted by the word **should** - denotes good practice. A justification will be required for not taking the action advised.

Code of Practice concerning under 18 year olds

1. Purpose

The University seeks to ensure that its duty of care towards all its staff, students and visitors is fully and effectively discharged, particularly in respect of those regarded in law as more vulnerable. Anyone under 18 years of age is, as a matter of law, defined as a child. The University recognises it has an enhanced duty towards children. The following procedures and guidelines have been established and agreed within the University to work towards ensuring fulfilment of duty of care towards under 18 year olds. All members of staff who come into contact with children are responsible for ensuring their role in fulfilling the University's duty of care is fully carried out.

2. Background: Legal Context

Who is a child?

- (a) UK Statute Law defines a child as a person under the age of 18 years. The term "child" and "under 18 year old" are used interchangeably in this document.
- (b) "Young person" is not a legal term, but for the purposes of this document, a young person is someone who might not perceive themselves as a child, but who is still in the age range of the legal definition.

Duty of Care

- (c) The traditional view of an education provider's duty of care towards a child was that of the reasonably careful parent. The education provider was considered to be in loco parentis.
- (d) This view has been eroded in recent case law such that the professional duty is now to take steps to "safeguard" children. Safeguarding is defined as meaning that agencies working with children should take all reasonable measures to ensure that risks of harm to children's welfare are minimised and that, where there are concerns about children's welfare, all agencies take all appropriate action to address these concerns [1].
- (e) The responsibility for safeguarding rests with "all those who come into contact with children and families in the everyday work, including practitioners who do not have a specific role in relation to child protection". [2]
- (f) Safeguarding within the University context includes:
 - i. Ensuring that children have the opportunity to participate in activities in a safe and secure environment;
 - ii. Enabling the parent/carers of the children to have confidence in the institution's care for under 18 year olds;

- iii. Ensuring that any child suffering from or who has suffered significant harm as a consequence of their interaction with the University is identified and responded to appropriately and quickly;
- iv. Ensuring that everyone who is unsuitable to work with children is identified and prevented from doing so within the University; and
- v. Working cooperatively with other agencies that provide services for children.

(g) The University notes that whilst universities are not included specifically in some elements of the existing legislation, courts may use guidance issued within the secondary and further education sectors as an indication of good practice to assess whether there has been a breach of the duty of care to children by universities.

3. Summary of Safeguarding and Duty of Care Arrangements at the University of Hull

Policy Statement

(a) The University does not accept an in loco parentis responsibility for children who may come into contact with it or its agents.

(b) The University does however recognise that it has special duties of care towards children:

- i. The University is committed to practice that protects children, young people and vulnerable adults from harm, whatever their age, culture, disability, ethnic origin, gender, language, religious belief and/or sexual identity;
- ii. The University is also committed to practice that helps ensure that members of its community who work directly with children or young people are not placed in situations where abuse might be alleged;
- iii. The University therefore seeks to take every reasonable step to safeguard children by adopting child protection guidelines through a code of behaviour (see General Guidance to Staff section below); and following procedures for vetting and training of people who work directly with children and young people.

4. Summary of Arrangements relating to all under 18 year olds (staff, students and visitors)

Specifically, the University:

(a) Identifies any staff whose everyday work brings them into regular contact with children (e.g. widening participation staff, marketing staff, security team, sports staff) and ensures that appropriate recruitment, selection and vetting procedures, and training are put in place;

(b) Has in place procedures for dealing internally with breaches of good practice, with reference to external procedures as appropriate, and for referral of the names of people deemed unsuitable to work with children;

(c) Operates a reporting and a complaints process to ensure that concerns about harm to children's welfare are appropriately responded to;

(d) Takes the following steps in order to work towards protecting people under 18 years old in respect of alcohol use;

- i. Not allowing anyone who is, or appears to be, under 18 years of age to purchase alcohol has been incorporated within the operational procedures of the University catering facilities in order to meet the requirements of the Licensing Act;
- ii. Restricting the hire of University-run facilities as birthday party venues, where alcohol is available, to 21st birthday parties and older – to avoid the potential of service of alcohol to children who may be friends of a person who has just turned 18;
- iii. Ensuring that a card clearly identifying any student under the age of 18 is issued to all such students;

(e) Undertakes periodic risk assessments, acting as appropriate on the outcomes.

Hull University Students' Union

- a) Families are welcome to dine in the bars of the students' union; children are permitted to remain in Wetherspoon at Sanctuary until 9pm. Children under the age of 16 years must always be accompanied by an adult over the age of 18 years and be supervised at all times. Note that the serving of alcohol is at the manager's discretion; there may be occasions when service is limited or refused to a whole group. We do not permit the purchase or consumption of alcohol by under-18s on our premises. 16- and 17-year-olds are welcome to visit Wetherspoon at Sanctuary Bar, without adult supervision, for food and soft drinks only.
- b) Under 18s are not permitted to attend student only licensed events (i.e. Tower) in Asylum nightclub.
- c) Under 18s are not permitted to purchase alcohol from the SPAR supermarket, staff reserve the right to ask for proof of age from any customer they believe to be underage.
- d) Students under 18 are not able to join our Sports and Societies or volunteer with HUSU, with the exception of Course Representation roles.

Detailed Arrangements relating to Students/Applicants who are Under 18 Years

(a) The University recognises a number of benefits from admitting students who are under 18 years old, including particularly the fact that this contributes towards the wide accessibility of higher education, enabling anyone who is able to benefit from University study to access it.

(b) It is also acknowledged that the University's enhanced duty of care towards more vulnerable students requires the utilisation of additional or different procedures in some cases. These are described below.

Admission

(a) The University defines its admission requirements in terms of academic achievement. Although it is unlikely that applicants will have achieved the necessary entry requirements before reaching the age of 18 on entry, circumstances may arise where an applicant will be under 18 on entry to the University.

- (b) A strong academic rationale for admission must be established to the satisfaction of the relevant Head of Department.
- (c) Informing the parent/guardian that the University is not in loco parentis;
- (d) Reminding the parent/guardian that a University is an adult environment; and
- (e) Requesting that they advise their child that s/he may not purchase alcohol until they reach the age of 18.
- (f) The University will store a list of the applicant's emergency contact details, in particular those of parent(s)/guardian(s). In the case of students from an overseas family background, the University strongly recommends that they have a UK based guardian.
- (g) Please refer to Appendix B, F and G for the detailed procedure for handling applications from under 18 year olds.

Pastoral Support

- (a) Wardens and Personal Supervisors with particular pastoral responsibility for registered students under the age of 18 years are DBS checked, and are provided with guidance on working with students under the age of 18, and are aware of the offence of abuse of a position of trust under section 2.3 of the Sexual Offences (Amendment) Act 2000. All professional counselling staff are similarly checked and advised.
- (b) Appendix C gives details in respect of the procedure for checking of Wardens and Personal Tutors, and allocation of tutees.

Accommodation

- (a) Registered students under the age of 18 years will not be allocated to share a room with a student of the opposite sex or an adult. Students will however share toilet and kitchen facilities with other residents and their guests/visitors (who may be adults and/or of the opposite sex).
- (b) Maintenance and cleaning staff may visit students' bedrooms and the University undertakes a programme of checking to ensure that these staff have passed a DBS check. The parent/guardian of applicants under the age of 18 years is advised of this fact before admission.
- (c) Students are not supervised in accommodation on a daily basis and are free to come and go without needing to sign in or out.
- (d) Students may contact their Warden concerning any matters relating to their stay in University residences or on any personal issue. Wardens do not however as a matter of routine make proactive contact with students living in University residences (ie. to check on their welfare).

Placements, Student Activities (including volunteering) and Study Trips

- (a) The University recognises the same duty of care in connection with off campus activities it organises or co-ordinates as it does for mainstream activities conducted on campus.

(b) In line with University policy, Risk Assessments will be carried out for all University-organised or co-ordinated off campus activities, trips or placements. Where any participant is likely to be under 18 years of age, the evaluation will include assessment in relation to accommodation, welfare support, staff checks and guidance, health and safety and other relevant issues.

(c) The University has adopted the Guidance on Risk Issues produced by AimHigher in 2004 as a pro forma for risk assessments, and copies of the relevant documentation are attached in the Appendices.

Access to inappropriate Material

(a) Issues concerning the likelihood of under 18 year old students being exposed to inappropriate material through their engagement with their academic programme will be discussed as part of the admissions process (see Appendix B).

(b) Student use of campus computing facilities (including the residences network) is regulated by the University's Computing Regulations. The regulations include a prohibition that users do not cause obscene, pornographic, discriminatory, defamatory or other offensive material to be transmitted over the University, national or public networks or cause such material to be stored on University computer systems.

(c) The University does not however monitor network traffic unless very unusual patterns of usage are noted or a complaint is received.

International Students

(a) The University provides an equitable level of safeguarding toward its students who are under 18, regardless of country of origin, and no further special measures are taken in respect of non-UK students who are under 18 years of age.

(b) The University expects that the parent(s)/guardian(s) of overseas applicants who are under the age of 17 years will nominate a UK guardian. This information is collected as part of the admissions process.

Research

(a) The University of Hull recognises that young people under the age of 18 have a contribution to make in the development and advancement of University business. Whilst the input of under 18's is welcome in all aspects of university business and activities, the University will seek the permission and consent of people responsible for those individuals who are participating in research, education and enterprise activity at or with the University and who are under the age of 18.

Emergencies

(a) Emergency contact information is collected from all applicants who are under the age of 18 years as part of the admissions process.

(b) The parent/guardian of under 18 year old applicants is invited to indicate whether they wish to be contacted in an emergency (which would include not only medical emergencies but also for example situations involving other emergency services, such as the Police). The University's practice is to act in accordance with this indication until the child passes the 18th birthday when the normal policy applies.

(c) The University notes that hospitals and the Police contact next of kin as a matter of course, and that the release of information to emergency services for any student is allowed, as long as that release is to protect the vital interests of the individual concerned. [3]

5. Detailed arrangements relating to Children of Staff, Students or Visitors

Children of Staff or Students

(a) Where children of students or staff members are present on the University campus, they remain the responsibility of their parent(s)/guardian(s), unless they have been placed in a childcare, play scheme or similar facility.

Children of Visitors

(b) Where children of visitors are present on the University Campus, they remain the responsibility of their parent(s)/guardian(s), unless they have been placed in a childcare, play scheme or similar facility.

Visitors to the Campus (including summer schools, work experience placements and visitors to University services and facilities)

(c) The welfare of under 18 year olds visiting the campus is the responsibility of the organiser of the activities in which the under 18 year olds are participating. Where the University is not the organiser of the activities, it accepts no liability. It is the responsibility of the organiser of activities involving under 18 year olds to ensure that appropriate and comprehensive risk assessments are undertaken in relation to the health, safety and well-being of children participating in activities on the University campus. Where the University is not the organiser of the activities, fully completed risk assessment documentation must be provided before any booking may be confirmed.

(d) The University has adopted the Guidance on Risk Issues produced by AimHigher in 2004 as a pro forma for risk assessments, and copies of the relevant documentation are attached in the Appendices.

Ad hoc Visitors to a University Service or Facility

(e) Where the under 18 year old is visiting a University service or facility which has an open access policy on an ad hoc basis (e.g. the library) it is with the understanding that the service or facility constitutes an adult environment and no responsibility can be accepted for the well-being of minors.

(f) Children under the age of 12 must be accompanied by an adult within the facility/service.

(g) Children aged between 12 and 16 years must either be accompanied by an adult or bring a letter of introduction from a relevant responsible adult.

Accommodation of under 18 year old Visitors on Campus

(h) The University will take steps to accommodate under 18 year olds staying overnight on campus in an area of residences which is not occupied by other adults except those receiving explicit clearance by University of Hull, although availability of accommodation may in some circumstances limit the University's ability to ensure this.

6. General Guidance to Staff

(a) Heads of Department/Service Area must ensure that any member of staff whose normal duties will include regular caring for, looking after or supervising a young person under the age of 18 is vetted and subject to Disclosure and Barring Service checks.

(b) Situations where there is only one staff member present with a child should be avoided. If a confidential interview or one to one meeting is necessary, these should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open.

(c) Meetings with any student under the age of 18 outside the normal teaching environment/institution should be avoided. Where such meetings cannot be avoided, inform another staff member that they are taking place.

(d) Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which may constitute a criminal offence.

(e) In situations where young students may be providing information of a particularly sensitive nature, for example to staff with pastoral responsibility, staff should be careful not to probe for details which could be construed as unjustified intrusion.

(f) Unnecessary physical contact with young people/children should be avoided, for example, gestures such as regularly putting a hand on the shoulder or arm. Whilst these gestures may be well intentioned, such acts could be misinterpreted.

(g) In situations where it is necessary for staff to restrain a young person/child in order to prevent self-injury, injury to others or damage to property, only the minimum force necessary must be used and any action taken must be to restrain and report to line manager at first opportunity.

(h) Staff required to administer first aid (normally a trained first aider) should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued.

(i) Staff should be careful in their use of language/terminology and must not make comments which could be interpreted as having a sexual connotation.

(j) There will be occasions when younger students are placed in settings outside of their normal place of study. This may be a professional placement, field trip, summer school, masterclass or taster event. Organisers must therefore ensure that policies and procedures are in place to protect young people/children from harm, focusing greatest protection on settings in which they may be at more risk. A guide and risk assessment pro forma are attached as Appendices D and E.

(k) The personal telephone number, personal email or home address of any staff member should not be given to young students.

(l) In the case of any student making a disclosure or where there is cause for concern, explain to the student that this information will have to be referred on and follow the guidance in the following section. Do not attempt to resolve any complaints alone and report all allegations or suspicions of abuse.

(m) If a member of staff feels that they or other members of the University may be at risk from being the subject of or exposed to unwarranted accusations in connection with younger students, they should alert their Head of Department or line manager.

7. Responding to Concerns about a Child's Welfare

Categories of concern about a young person's welfare

The definitions below are reproduced from the Government's guidance [4]:

(a) A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. Some children or young people may be more vulnerable than others, and this can influence how the University should respond to concerns about their welfare. For example, young people of 16 and 17 may legally consent to most types of sexual activity, although they may still be relatively immature emotionally (they cannot, however, legally have sex with anyone who has any position of trust regarding them). On the other hand, even people who are adults may be more vulnerable because of mental or physical disabilities. In addition, particularly vulnerable young people (such as those with physical or mental disabilities) may find it more difficult to recognise and report abuse (for example because of communication difficulties, limited life experiences or fears about challenging people).

(b) Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing, ill-health.

(c) Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent diverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, valued only insofar as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children.

(d) Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

(e) Neglect is the persistent failure to meet a child's basic physical and/or physiological needs, likely to result in the serious impairment of the child's health or development, such as failing to provide

adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a child's basic emotional needs.

Process for Reporting concerns about a Child's Welfare

Concern may arise because:

- (a) A young person discloses abuse;
- (b) There are observable changes in a young person's behaviour that may be related to abuse;
- (c) A young person may abuse another young person;
- (d) The behaviour of a member of staff towards a young person causes concern or there is suspicion that a member of staff is harming a child;
- (e) Or there are suspicions or indicators that a young person is being abused.
- (f) It is important to be aware that indicators of abuse can be very difficult to recognise and the list below is not exhaustive. It is also very important to note that the presence of one or more of the indicators is not proof that abuse is taking or has taken place. It is not your responsibility to decide whether a child has been abused, but only to raise concerns that you may have. Indicators or impact of abuse may include the following:

- ❖ Unexplained or suspicious injuries (such as bruising, fractures, scalds, pinch marks, or bites - particularly if situated on a part of the body not normally prone to such injuries);
- ❖ Unexplained behaviour changes (eg. becoming withdrawn or aggressive);
- ❖ Inappropriate sexual awareness, sexually precocious behaviour or pregnancy;
- ❖ Distrust of adults, particularly those with whom a close relationship would normally be expected;
- ❖ Self harm or mutilation or suicide attempts;
- ❖ Eating problems;
- ❖ Depression;
- ❖ Becoming increasingly dirty or unkempt.

(g) Staff members should stay calm, listen, be reassuring, record information and seek support.

(h) Any concerns about a child's welfare should be reported to:

Registered students – Head of Student Support and Experience.

Prospective students – Head of Admissions and Applicant Services.

Reporting Process

(a) Working with children places staff and volunteers in a position of power. In order to retain trust, it is essential that all reasonable steps are taken to ensure the responsible exercise of this power. Staff, student mentors and volunteers have the right and the responsibility to raise any genuinely held concerns about any abuse of power or trust by their colleagues. Reporting is part of the transparent working practices and it not intended to set up mistrust or suspicion.

(b) If you have any concerns about the behaviour of a student mentor or volunteer, you should raise those initially with the mentoring or volunteering programme coordinator.

(c) If you have any concerns about the behaviour of a member of staff, you should contact the University's HR Department.

(d) Every effort will be made to accommodate a request for anonymity by a staff member raising concerns about a colleague, a mentor or a volunteer.

(e) The University operates this reporting process in order to encourage a responsible and transparent approach to working with children, with the intention that the parents and guardians of children with whom the University has contact will have confidence in the institution. The University will promptly and thoroughly investigate all concerns raised within this process, and will respond appropriately, utilising its internal disciplinary processes and/or relevant external procedures as appropriate.

(f) If a member of staff feels that they or other members of the University may be at risk from being the subject of or exposed to unwarranted accusations in connection with younger students, they should alert their Head of Department or line manager.

Referral of People deemed unsuitable to Work with Children

(a) The Protection of Children Act (1999) provides a cross sector framework for identifying people who are considered to be unsuitable to work with children and young people.

(b) The University will comply with the request that all agencies refer people who are deemed unsuitable to work with children to the PoCA list.

(c) This matter is coordinated by the University's HR Department.

8. Risk Assessment

The Student Recruitment Service will work together with the Student Support Services and staff from Professional Services and Academic Schools and Departments in ensuring that suitable risk assessments are carried out in respect of individual applicants and students under 18 years old for whom this is deemed relevant or appropriate, as well as in relation to general matters concerning the welfare of children.

9. Review and Update of Policy

The University Registrar and Secretary will coordinate the periodic review and update of the University's policy, procedures and guidance in relation to students under the age of 18 years.

Appendix A: Letter sent to Parent/Guardian of Under 18 Year Old Applicants

This letter to be sent to the applicant in an envelope addressed to the Parent/Guardian of with "Access to Help" leaflet enclosed.

TO: The Parent or Guardian of

Dear Sir/Madam

Admission of applicants under the age of 18

I am writing to you as the parent/legal guardian of [name]. As you will be aware, [name] will be under 18 years of age at the start of their course at the University of Hull.

United Kingdom law defines people under the age of 18 years as children and although not specifically covered by the legislation, Universities have an enhanced implied duty of care towards students who are legally children. In order to enable us to properly fulfil this duty of care I would like to inform you about a number of points in relation to your child's time at University.

First, you need to be aware that the University is not "in loco parentis". This means that the University will not act in a parental capacity towards [name].

Secondly, the University is taking steps to seek to ensure that staff with pastoral responsibilities for students under 18 years have been Disclosure and Barring Service checked. However, as you may imagine, with an academic and support staff of over 2,000 we are focusing these checks on residential Wardens and appropriate Personal Tutoring staff. You therefore need to be aware that your child will have dealings with members of staff or contractors who may not have been DBS checked, although their Personal Tutor and Warden (where appropriate) will have been.

The residential University accommodation is serviced by maintenance and cleaning staff who also may not have been checked in this way. You therefore need to be aware of the possibility that University staff and contractors who may not have been DBS checked may have access to your child's room if they are living in University accommodation.

In general, students are not supervised in accommodation on a daily basis and are free to come and go without needing to sign in or out. Further details of the University accommodation can be found in the Accommodation Handbook (available on request from the Accommodation Office). The University of Hull campus catering facilities include several bars/restaurants that are licensed. You may wish to advise your child that they would be breaking the law should they consume or purchase alcohol from these outlets whilst under the age of 18.

Finally, we need to make sure that any potential students under 18 years old who apply for a place on a University programme have the permission of their parent or guardian to attend that programme. In this context, I would be grateful if you could complete and return the attached form, confirming your permission and giving us your preferred means of emergency contact.

Although informing you of these points is necessarily formal, I do want to reassure you that the University campus is in general a safe and happy place where the majority of students enjoy their time and have a trouble free University career. When things are difficult for students we have a high quality and well coordinated support network to resolve problems including a 24/7 Security presence on campus, residential Wardening staff who support student welfare and ensure discipline

in each residence, and a range of professional support services available to all students. Further details can be found in the enclosed leaflet, "Access to Help".

If you have any questions please do not hesitate to contact me using the details above.

Yours faithfully

Director of Student Recruitment

Encs: Access to Help Information for students

Admissions of under 18 year old students to University Programmes

The University requires that students who will be under the age of 17 years at the start of their studies on a University programme must have the permission of their parent or guardian to attend the programme **and therefore a fully completed and signed copy of this form is required before registration can be confirmed. The University would also prefer that the parent/guardian of an applicant who will be under 18 on entry returns the completed form.**

The University guidelines on under 18 year old students are available at <http://www.hull.ac.uk/policyregister/policies/index.html>

Response by Parent/Guardian

I understand that the University cannot be held responsible for student welfare whilst [full name of student] _____ is off-campus and I have been advised to make appropriate arrangements to ensure safety during such periods.

I recognise that the University cannot act “in loco parentis” (in place of the parent) at any stage of the attendance on the programme of study, either on or off campus.

I would like / would not like* the University to communicate with the contact nominated below in an emergency situation concerning the name student (*please delete as appropriate).

I hereby give my permission for [full name of student]:

.....

To attend the University of Hull programme [name of programme]:

.....

Starting Date:

Nominated parent/guardian/other emergency contact [full name]:

.....

Relationship of named person to the student:

Home Tel: Work Tel: Mobile:

Nominated contact address:

.....

.....

Please see note below.

Signed: Date:

Print parent/guardian name:

Home Tel: Work Tel: Mobile:

Nominated parent/guardian address:

.....

.....

Date: / /

Note: Applicants whose parent or guardian lives outside of the UK are strongly advised to have a UK based guardian. Please therefore provide relevant contact details of a person who lives within the UK whom the University should contact in necessary.

Please return this completed form to [5]:

Head of Admissions Service, Student Recruitment Directorate, The University of Hull, HU6 7RX, UK.

Appendix B: Procedure for Handling Applications for Under 18 Year Olds

The following outlines the University procedures for handling applications from candidates who will be under 18 years of age at the start of their course. This applies to all applicant groups including those seeking entry to a full degree, exchange, visiting and occasional students.

The Admissions Service has administrative responsibility for issue of offer letters to UCAS and teacher training, PG on-campus and PG distance taught applicants. Where reference is made in this procedure to the Admissions Service the same process must be following by the service/department with responsibility for issue of offers for any other programme of study.

1. Applications from potential students who will be under 18 years of age at the start of their chosen course will be flagged up on the admissions system and/or on the application form.
2. If a Department decides that it wishes to offer a place to an applicant on academic grounds, who will be under 18 years of age on entry, the Admissions Tutor should return the application form to the Admissions Service to process the offer. In order to ensure all necessary steps are followed, departments should not issue the offer themselves without reference to this procedure. Admissions Tutors are advised to alert the Head of Department to the potential admission of an under 18 year old applicant.
3. Academic departments are required to provide annually a list of all programmes of study which contain sensitive material, professional or statutory body requirements, or placements/interactions with the general public within trimester 1. Courses that do not fall under these provisos do not require applications to be considered under this procedure where an applicant is due to turn 18 years old within trimester 1. This list can be found in Appendix F.
4. Where a course is deemed to have sensitive material, placement/interaction with the general public in trimester 1 or other relevant factors, it may be necessary to arrange a discussion prior to an offer being made between the applicant, the nominated parent/guardian and academic department staff and student support staff to make sure all parties have a realistic understanding of the campus environment, and also to enable the University to identify any particular risks or additional support that the applicant may require in order to cope effectively with campus life or to make reasonable adjustment to the programme of study (e.g. if certain field work might not be suitable). In a small number of cases, the outcome of the discussion may also be the addition of specific conditions which the applicant must meet in order to qualify for a place, or for access to other University services (such as residential accommodation). A record of any such meetings/discussions must be included with the central admissions record and any additional conditions of offer notified for including in the formal offer. The check-list for academic departments is contained in Appendix G.
5. The Admissions Service will routinely provide an opportunity for parental consent for all applicants who will be under 18 years old at admission for those programmes administered centrally, by forwarding a letter, information sheet and pro forma of consent to the applicant in parallel with issue of the offer of admission. For those who will be under 17 on entry the offer issued must include the requirement for the University's receipt of the completed parental consent form.
6. For overseas applicants, it is strongly recommended that a UK based guardian be nominated.
7. University of Hull employees making offers on location will be responsible for ensuring that the procedure is followed, including any necessary liaison with the academic department, prior to an offer being issued.

8. On receipt of the pro forma of consent from the parent/guardian, and where relevant completion of any necessary discussions, the Admissions Service can act on behalf of the Vice Chancellor to admit him/her (providing all other conditions of offer have been satisfied).

9. The Admissions Service will record the details on the Admissions record and file the reply with the applicant's application records.

10. Student Support Services will make recommendations and help to coordinate arrangements arising from any interview or risk assessment process, but such arrangements will be the responsibility of the areas or departments in which they are required (e.g. in accommodation or school-based activities).

11. The Accommodation Office will ensure that under 18 year old candidates are not normally allocated to shared accommodation.

12. Student Support Services will ensure the appropriate onward promulgation of the information.

13. A copy of the letter from the Admissions Service is attached as Appendix A.

Partner Institutions

Partner institutions will have in place appropriate procedures for the admission of students under 18 delivering validated/franchised programmes.

Appendix C: Procedure for checking of Wardens and Personal Tutors, and Allocation of Tutees

1. The HR Department centrally coordinates through the Head of Student Support Services the DBS checking of all Wardening staff.
2. The AO will notify relevant Wardens and Directors of Undergraduate Studies of the names of any applicants who are under 18 years old on entry.
3. Directors of Undergraduate Studies [or those responsible in Departments for the allocation of tutees to Personal Tutors] will pass the names of Personal Tutors who have been allocated tutees under the age of 18 years to the Department HR Officer so the Department HR Officer can ensure an appropriate DBS check is completed.

Recommended Safeguarding Practice for Summer Schools and AimHigher activities

These recommendations should be considered for all activities that involve young people on HEI premises, including all residential and non-residential activities and regardless of whether a long or short term "contact" activity.

Recruitment

Student mentor application forms should request a minimum of two referees.

Referees should have known the applicant for a continuous five year period. References from teachers are acceptable.

If two references are not available for the five year period, then at least one must have known the applicant for five years and a further two referees must have known the applicant for three years. Family members are NOT acceptable.

References should be taken up by telephone with a request for one written reference to follow. Student mentors should apply for the position on a yearly basis.

Interviews

There should be at least two people on the interview panel for student mentors. The interviewers should have undertaken safeguarding training and hold a current enhanced DBS check.

It is good practice to include a year 10 or year 11 pupil on the interview panel.

Enhanced DBS Checks

DBS checks should be undertaken at least every two years.

List 99 checks are **NOT** acceptable.

AimHigher co-ordinators or other senior members of the AimHigher team must NOT check the original documentation submitted for the DBS application form of other staff members involved in the activities.

It is good practice for a member of HR to check original documentation of staff.

Designated Child Protection Officers

There should be at least two design at child protection officers.

A senior member of staff (preferably the Head of the Department/School/Faculty or the Head of HR) should also be a designated Child Protection Officer. This is essential for allegations made against staff. Details and contact numbers of Designated Child Protection Officers should be made known to all staff involved, student mentors, parents/carers and pupils.

All staff and student members must only report allegations of abuse against a staff member to the Head of HR and no other member of the staff team even if they are designated CPOs.

Safeguarding Training

A minimum level of safeguarding training must be given to everyone involved in the activity.

This should include:

Case studies – How would you deal with the following (before any training is given)?

1. Indicators of abuse – signs, symptoms, impact, fears.
2. Good practice is to show the video “Only a Kiss at this point” (available from the Princes Trust) and then get the participants to discuss the impact it would have on the children if they attended the Summer School/activity the next day.
3. Handling a disclosure.
4. Roles and Responsibilities – it must be made explicit who the student mentor must report an allegation against a staff member to.
5. Confidentiality Agreements.
6. Code of Behaviour.
7. Child Protection Agreement.
8. Individual agreements should be signed and dated at the end of the training session and held on file.
9. A safeguarding handbook should be given to all participants to refer to after the training.
10. Opportunities are made available for individual participants to talk or discuss matters further with to a “safe” person after the training session in confidence.
11. Further support sessions should be offered for those who encounter child protection concerns during their course of work.

You will need to consider whether the person(s) facilitating the training are suitably experienced and/or have a good understanding of issues likely to be raised.

Written Policies

In addition to the child protection policy there should be:

Written standards of personal behaviour, conduct and language for:

- a) ALL staff involved in the activities.
- b) The young people.
- c) An anti bullying policy.

It is good practice to send copies of these to the HR Department.

Activities

All staff involved, including student mentors and academic staff should wear a photo ID badge on a neck chain.

All ID badges should have the contact details of “safe” people to contact on the reverse side. It will be necessary to determine who the “safe” people are. This should include security.

All “safe” people should undertake at least the minimum level of basic child protection training.

All “safe” people should have an enhanced DBS check.

At least one member of staff should be contactable at all times on a mobile phone. This should not be a personal mobile phone number.

There should be at least one dedicated AimHigher mobile phone number.

Student mentors and staff involved should be made aware of the person “on call”. The rota for on call duties should be given to all staff involved.

External facilitators should be asked to sign a code of behaviour, which includes agreeing not to make personal intimate relationships with any pupil or student mentor either during or after the activity has finished.

You will also need to consider who else would need to sign a code of behaviour, eg. catering staff, mini bus drivers etc.

All student mentors should be easily recognisable to the young people and their parents.

Appendix E Risk Issues Checklist for Summer School Leaders

Name of Institution:

Action Point	Action to be Taken	Signed	Date
1.	I have checked that the HEI has appropriate insurance cover for the summer school activities		
2.	I have made arrangements for the insurance of those activities not covered by the HEI's insurance cover. Write NA in the next column if this action point is not applicable.		
3.	I have set up a system for storing student data, especially that in Parental Consent Forms, which is secure but accessible to key staff.		
4.	I have made arrangements for there to be clear handover points for students arriving at the summer school and on completion of the course. In addition, I have communicated these arrangements in writing to students and parents/carers, or have plans to do so.		
5.	I have issued the Code of Behaviour for Students, or a modified version of it, to students and parents/carers.		
6.	I have made arrangements for removing students from the summer school in the event of serious incidents of misbehaviour, including arrangements for staff to escort students home when necessary.		
7.	I have made arrangements for separate male and female sleeping and bathroom facilities for students and staff. Write NA in the next column if the summer school is entirely non-residential.		
8.	I have appointed responsible adults who have received police checks to work as night-time supervisors at residential accommodation sites. Write NA in the next column if the summer school is entirely non-residential.		
9.	I have put in place emergency procedures in the event of a fire or other emergency, and will brief staff and students accordingly.		

10.	I have put in place a system for reporting and investigating accidents and “near misses”.		
11.	I have made arrangements regarding first aid so that emergency help will be available at all times while the summer school is running.		
12.	I have made arrangements so that any student who requires prescribed medication during the summer school will be able to receive it.		
13.	I have put in place procedures to ensure the safety of students’ personal possessions and for the security of HEI property.		
14.	I have prepared information for students, or have plans to do so, that includes details of the personal support they will receive during the course.		
15.	I have made arrangements for staff, including mentors/buddies, and visitors to the summer school to be readily identifiable to students.		
16.	I have checked that risk assessments for summer school activities exist and are valid, and conducted further risk assessments where necessary.		
17.	I have consulted those organisations hosting off-site visits and checked that they are aware of potential risks and will follow appropriate safety procedures.		
18.	I have checked that staff responsible for “adventurous activities” are suitably qualified, and I am aware of the safety arrangements that will be in operation.		
19.	I have developed a Child Protection Policy for the summer school along with a Code of Practice for putting this policy into practice.		
20.	I have provided training/induction for staff, or have plans to do so, including the specific training/induction of mentors/buddies who will be working closely with students.		
21.	I have considered the adult-student ratios to be in operation throughout the summer school course and believe		

	them to be appropriate in ensuring safe supervision.		
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The activity 1 2 3 4 5	The individual 1 2 3 4 5	The activity leader		The environment		Access to first aid		External factors	
		1 2 3 4 5	1 2 3 4 5	1 2 3 4 5	1 2 3 4 5	1 2 3 4 5	1 2 3 4 5		
1.	Within the everyday experience of the individual.	Very experienced – appropriate level of competency	Experienced and qualified at the appropriate level	Urban or rural hazards that are predictable	First aid emergency support – staff qualifications at appropriate level	Weather appropriate to the activity, any change will have no adverse effect on the group			
2.	Outside the everyday experience of the individual but the tasks have familiar aspects	Regular exposure to the activity. An adequate level of competency	Minimal qualifications, regular participant	Urban and rural hazards that change quickly	First aid and emergency support; staff minimally qualified in first aid	Weather appropriate to the activity; any change will have minimal effect, but will not affect safety			
3.	Outside the everyday experience of the individual but competency has been achieved in training	Experience at a recreational level, some competency	Minimal qualifications, recreational participant	Industrial Overnight stays	First aid and emergency support – staff unqualified in first aid	Weather change could lead to problems if the group is not adequately prepared by training or equipment			
4.	Outside the everyday experience of the individual but training has been given	Some experience at an introductory level No competency	Some experience as a leader; limited or recreational participant	Close proximity to water, cliffs or other dangerous topographical feature	No first aid and emergency support readily available Staff appropriately qualified in first aid	Weather change could lead to serious problems if the group has not achieved a level of competency in the activity or is not adequately equipped.			
5.	Outside the experience of the individual with no similar aspect training etc.	Absolute novice, no experience of the activity and/or has special needs	No experience of the activity in a leader capacity, some experience as a participant	Travel to other countries. Areas classified by NGBs as advanced, eg. sea, wilderness areas etc.	No first aid and emergency support readily available Staff inappropriately qualified or not qualified in first aid	Weather change could have serious repercussions for the group			

Risk Assessment Grading School:

Visit to:

Name of party leader:

Date of Visit:

Date of risk assessment:

Assessment – insert score	6-10 Low Risk	11-19 Medium Risk	20-25 High Risk	26-30 Unacceptable
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[1] The Children Act (1989), and Joint Chief Inspectors (2002) Safeguarding Children: A Joint Chief Inspectors' Report on Arrangements to Safeguard Children, London: DH Publications.

[2] Department of Health (2003) What to do if you're worried a child is being abused, London: DH Publications.

[3] Reference: Data Protection Act.

[4] Department of Health (2003) What to do if you're worried a child is being abused, London: DH Publications.

[5] The return address may be amended according to the administration of the programme (e.g. Scarborough, CLL, Language Institute).

[6] It is anticipated that an extended consideration process will be utilised for any applicants who are deemed by the University to have a particular vulnerability. Indicative examples would include very young applicants or those applicants whose UCAS or other application form gives rise to an indication of special vulnerability.

Appendix F: Programmes requiring under 18 check-list prior to offer

- BA (Hons) Primary Teaching
- BA (Hons) Early Childhood Studies
- **All** BSc (Hons) Nursing programmes
- BSc (Hons) Midwifery
- BSc (Hons) Operating Department Practice
- BSc (Hons) Physiotherapy
- BSc (Hons) Environmental Science
- BSc (Hons) Marine Biology
- BSc (Hons) Geography
- BSc (Hons) Accounting and Financial Management
- BSc (Hons) Financial Management

Appendix G: Under 18 Student Check-list for Academic Departments

U18 student checklist for academic departments

This checklist has been prepared and should be followed in conjunction with the CoP concerning under 18 year olds.

The checklist (**points 4 onwards**) should be completed by the Admission Tutor and Countersigned by the Head of Department, for any applicant who will be under 18 at the start of the programme, who has been considered as meeting the usual entry requirements, before an offer is made. Points 1-3 will be completed by the Admissions Service once an offer is issued.

Applicant Name:

Applicant Code:

Programme:

Intended Start date:

Date on which applicant will become 18:

Point	Rationale	Actions	Completed; initial & date
1.) Check with admissions in relation to what information has been sent to the student and parents to ensure consistency of message.	To ensure consistency of message for staff, student and parents; a standard letter is sent from admissions outlining key information and a copy should be on the student's file	1.1) Check letter has been sent	1.1)
		1.2) Check copy of letter is on file and staff familiar with contents	1.2)
2.) Check emergency contact details have been entered on to SITS	To ensure the department has access to emergency contact details (<i>this should be part of the admissions process but is worth checking</i>).	2.1) Check details are on student information system	2.1)
		2.2) Contact admissions if details are missing	2.2)
3.) The admissions team will forward details of the student to Student Support Services	To ensure service area is aware of the student and can ensure appropriate actions are put in place	3.1) Inform the Mental Health Support and Student Life Team, of the student and their details as soon as possible	3.1)

4.) Identify members of staff who will have a close working relationship with student	To ensure that where relevant, any staff member who will have a closer working relationship with the student (for example Personal Tutor) have been considered under the disclosure and barring service check. If deemed necessary this must be undertaken before any support can commence.	4.1) Identify the staff who will come into close contact with the student, such as their Academic Support Tutor.	4.1)
		4.2) Outline the relationship with the student and determine if DBS clearance is appropriate (<i>i.e. anyone who will regularly supervise students</i>)	4.2)
		4.3) Check DBS status of staff member with HR and if deemed necessary arrange for this to be undertaken (through HR) Please note, this must be completed prior to the arrival of the student.	4.3)
5.) Will there be any summer school / off-campus activities the student will be involved with prior to their 18 th birthday	To ensure adequate risk assessments have been completed and adequate provision put in place	5.1) Check if there will be any summer school / off-campus activities	5.1)
		5.2) If appropriate, undertake a risk assessment	5.2)
6.) Does the programme of study have any material which could be considered inappropriate in normal use for the	To ensure the student is not exposed to any inappropriate material (<i>this should have taken place at the application stage</i>)	6.1) Check with the programme leader regarding material	6.1)

programme in the period prior to their 18 th birthday	<i>however it is important to re-check)</i>	6.2) If there is a possibility for this to occur, a discussion needs to take place between the admissions tutor and programme leader (and if appropriate HoD) to explore alternative options	6.2)
7.) Is there a potential for the student to be asked to participate in a research study prior to their 18 th birthday	To ensure that appropriate consent is gained from those with responsibility for the student	7.1) Check if the programme includes any opportunities to participate in research as a participant / volunteer	7.1)
		7.2) In the event of this being an option, those with parental responsibility must be informed	7.2)
8.) Is there the potential for a member of staff to be alone with the student prior to their 18 th birthday	To ensure students and staff are protected adequately	8.1) Identify any possible instances where staff may be alone with students	8.1)
		8.2) Ensure this is avoided where possible or planned for, to ensure adequate provisions are put in place	8.2)

9.) Is there the potential for meetings / attendance requirements outside normal hours prior to their 18 th birthday	To ensure students and staff are protected adequately	9.1) Identify any possible instances where activity outside of hours is planned	9.1)
		9.2) Ensure this is avoided where possible or planned for to ensure adequate provisions are put in place	9.2)

Recommendation (tick one option):

Offer for intended start date ☐

Offer but for deferred entry ☐

Completed by:

Date:

Authorised to proceed with offer of admission (Head of Academic School):

Date: