



University Campus St Albans Ltd

Safeguarding Policy

2020/21

INTRODUCTION

This document sets out the University Campus St Albans (UCSA) policy for the safeguarding of children, young people and vulnerable adults which has been approved by the Secretary and Registrar.

2 SCOPE

Unless indicated otherwise in the text, this policy applies to all staff, students and other individuals working with children, young people and vulnerable adults.

3 DEFINITIONS

3.1 For the purposes of this document the following definitions will apply:

3.1.1 'child': a person under 16 years of age;

3.1.2 'young person': a person aged 16 – 17;

3.1.3 'vulnerable adult': a student or member of staff or visitor or external user of UCSA services or facilities, who: (i) is in University student residential accommodation and receiving domiciliary care for health or disability reasons; or (ii) receives a health, social care or other service or participates in activities specifically for people with those disabilities or health conditions. People with physical or mental health conditions or learning difficulties are not considered vulnerable adults unless the criteria set out in section 3.1.3, (i) or (ii) are also applicable.

3.1.4 'Social Media/Social Networking': any on-line tool, such as a website, which allows people to interact with each other in some way – by sharing information, opinions, knowledge and interests. Social networking websites such as Facebook or LinkedIn are perhaps the most well-known examples of social media but for the purposes of this policy, the term also means, but is not necessarily limited to, other web-based services such as blogs, video and audio podcasts, wikis, message boards, photo document and video sharing websites such as Tumblr or YouTube; micro blogging services such as Twitter; communication technologies such as mobile phones, cameras, PDAs, Tablets, Portable Handheld Consoles, Games Consoles or other hand-held devices and any other emerging forms of communications technologies;

3.1.5 'Parent': parent, guardian or foster parent.

4 POLICY

4.1 UCSA:

4.1.1 will comply with the Safeguarding Vulnerable Group Act 2006 (section 4.2, refers), the requirements of the Disclosure and Barring Service (DBS) (section 4.3, refers) and with its duty to refer unsuitable staff or students to the Independent Safety Authority (ISA);

4.1.2 will take reasonable steps to safeguard and promote the welfare of children, young people and vulnerable adults;

4.1.3 aims to maintain the highest possible standards to meet its social and legal responsibilities but cannot act 'in loco parentis'. Therefore, ultimate responsibility will continue to rest with parents and guardians.

4.2 Safeguarding Vulnerable Group Act 2006

4.2.1 UCSA has a duty to comply with the Safeguarding Vulnerable Group Act 2006 and will ensure that any member of staff or any student who is to participate in a Regulated Activity¹ will be checked under the Disclosure and Barring Service (DBS).

4.2.2 UCSA will also comply with its on-going duty to refer relevant information about Disclosure and Barring Scheme members to the Disclosure and Barring Service.

4.3 Disclosure and Barring Service (formerly Criminal Records Bureau) - Oaklands College carries out Disclosure and Barring Service checks (formerly Criminal Records Bureau checks) on all staff who are employed with UCSA. Any staff seconded by the University of Hertfordshire to work for UCSA are subject to their required checks. UCSA is committed to ensuring that such staff and students have DBS checks in compliance with UK law, and good Human Resources practice, in order to ensure that their suitability to work with children and young people is confirmed.

4.4 University Identify Cards and access

4.4.1 To ensure that they are easily identifiable.

4.5 Emergencies - UCSA may be required to act on a student's behalf, for example, by dealing with the police or in a medical emergency. UCSA will only take such action when the parent/guardian of the student cannot be contacted quickly enough and:

(i) during working hours only with the permission of the Director or Assistant Director ;

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1 Regulated activity includes: (1) Any activity which involves contact with under 18s or vulnerable adults (as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006) and is of a specified nature (e.g. teaching, training, care, supervision, advice, treatment, or transport), frequently (i.e. once a month or more often), intensively (i.e. taking place on more than two days in any 30-day period) and/or overnight (i.e. activity that occurs at any time between 2am and 6am and the activity gives the person the opportunity to have face-to-face contact with under 18s or vulnerable adults); and/or (2) Any activity allowing contact with under 18s or vulnerable adults (as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006) and is in a specified place (e.g. schools, care homes, etc), frequently, intensively and/or overnight. Regulated activity also includes any activity that involves, on a regular basis, the day-to-day management or supervision of a person carrying out regulated activity.

(ii) out of hours only with the permission of the senior member of staff on call at Oaklands College

5 ROLE AND RESPONSIBILITIES

5.1 Director of Higher Education:

(i) will identify which members of staff need to undergo Disclosure and Barring Service checks, ensure that the necessary arrangements are made for this to be done and that the required checks have been completed;

(ii) will ensure that all appropriate staff are notified when there are children, young people or vulnerable adults within the student cohort;

(iii) will ensure that any programme or activity involving children, young people or vulnerable adults is risk assessed, planned, organised and delivered in accordance with the policies and regulations set out in this document. The purpose of risk assessment is to mitigate or remove any potential risks and to prompt the consideration and review of working practices²;

(iv) may delegate all or some of the responsibilities referred to in section 5.1, i, ii and iii to an appropriate nominee.

5.2 Children are not permitted to be present at lectures, seminars or other teaching activities.

5.3 Work experience where a subject area to provide work experience for children, young people or vulnerable adults, the Director of Higher Education (or nominee) will:

(i) ensure that a specific risk assessment is carried out (section 5.1, iii, refers), and

(ii) determine whether it is appropriate that the proposed supervisor undergoes a Disclosure and Barring Service check and ensure that, where required, this is carried out, and

(iii) ensure where a work placement has been requested by an external organisation, that information is requested from that organisation regarding any support arrangements required by the child, young person or vulnerable adult concerned.

5.4 Placements - For programmes which include placement activities, Director of Higher Education (or nominee) will ensure that placement providers understands and accepts that the policies and procedures of the placement provider will apply while the student is under the jurisdiction of the placement provider.

² Note for guidance: A risk assessment should include: the standard health and safety risk assessment; identify the nature, length and frequency of contact; consider any child, young person or vulnerable adult who might seem particularly at risk; identify any potential areas for harm and set out the action required to prevent harm occurring; identify where staff and students will require a DBS check and in doing so, take account of the lead times for obtaining them. In making a risk assessment in connection with the proposed presence of the child of a student or member of staff, consideration will also be given to the risk that the child may present to the safety of others);

5.5 Field trips Where field trips are undertaken as part of the University of Hertfordshire programme, Director of Higher Education (or nominee) will consider the age of the students as part of the risk assessment for the activity (section 5.1, iii, refers).

6 MEMBERS OF STAFF – ROLE AND RESPONSIBILITIES

6.1 Individual staff are personally responsible for informing Director of Higher Education (or nominee) if there is any change in their circumstances which may be relevant to the policy set out in this document.

6.2 Members of staff must contact the Safeguarding Officer for Children and Vulnerable Adults (section 7, refers) if they have any cause to believe that a child, young person or vulnerable adult is at risk, or constitutes a risk to others.

7 SAFEGUARDING OFFICER FOR CHILDREN AND VULNERABLE ADULTS (SAFEGUARDING OFFICER)

7.1 Oaklands College provide a designated Safeguarding Officer for children and vulnerable adults and will act on behalf of UCSA.

7.2 The Safeguarding Officer has responsibility for oversight of issues relating to the protection of children and vulnerable adults within UCSA. ³

8 CONFIDENTIALITY AND RECORD KEEPING

8.1 Where a disclosure is made that concerns a child protection issue in relation to a person under the age of 18, members of staff are obliged to report the matter in accordance with statutory requirements and cannot keep the matter confidential. (Note for guidance: With regard to data protection matters, written consent is required from people under the age of 18 in the same way as adults. However, where child protection issues are involved it is not possible to offer confidentiality to a person under the age of 18. Staff must therefore indicate clearly to anyone under the age of 18 or a vulnerable adult that they (the members of staff concerned) are obliged to report the disclosure in accordance with statutory requirements and cannot keep the matter confidential).

8.2 Records of all referrals received and their outcomes will be held in confidence, in accordance with the Data Protection Act (1998), by the Safeguarding Officer.

³ Note for guidance - Hertfordshire Agencies: The Safeguarding Officer may consult relevant county agencies to determine the most appropriate course of action or share information. The Hertfordshire agencies are the Hertfordshire Safeguarding Children Board (HSCB) which has a statutory role to safeguard and promote the welfare of all children and the Hertfordshire Safeguarding Adults Committee (HSAC) which has developed an inter-agency procedure for the protection of vulnerable adults in Hertfordshire.

9 SOCIAL MEDIA AND SOCIAL NETWORKING

9.1 UCSA acknowledges the potential impact that Social Media and Social Networking have on the lives of children, young people and vulnerable adults, and recognises the dangers and potential risks that these sites can pose, for example, facilitating inappropriate interaction with them.

9.2 UCSA is committed to ensuring that any one-to-one communication via social media or social networking sites is kept in the 'public eye' in order to safeguard all parties to that relationship.

9.3 Social Networking – guidelines for use of social networking as a means of contacting young people

9.3.1 As part of the risk assessment drawn up for any event, visit or activity, the event organiser should assess whether individuals attending or leading the event may come in to contact with children or young people.

9.3.2 Event organisers will ensure that individuals involved in the leadership or delivery of an event are made aware of the policies, regulations and guidelines set out in this document and that they must comply with them.

9.3.3 Staff members, volunteers, student ambassadors, mentors and others involved in the leadership or delivery of an event:

i are expected to keep a professional distance from students/participants;

ii will, at all times, ensure a clear separation between their private social lives and those of students/participants;

iii are not permitted to interact, via social media or a social networking site, with any child or young person, as defined in section 3 of this document, who is or has been a student/participant unless there is a clear educational benefit;

iv will, where they receive an invitation for a 'friend request' from a student/participant, delete the request immediately;

v will not establish, or seek to establish, social contact (via social media, social networking sites or other media) with students/participants, for example, for the purpose of establishing a friendship or to pursue or strengthen a relationship.

9.4 Social media – guidelines for use of social media sites to communicate with children and young adults

9.4.1 All social networking sites have the potential to allow staff/employees to communicate with young people on a one-to-one basis.

9.4.2 When using Facebook communication can be made using the public wall function which is the recommended method for communicating with children and young people individually on Facebook and for replying to private messages which children and young people may have sent to the staff member/employee.

9.4.3 Depending on the type/level of information a child or young person has disclosed using a social networking site, where a public wall post is not appropriate as a medium for responding to a child or young person, members of staff, volunteers, student ambassadors, mentors and others involved in the leadership or delivery of an event should arrange a one to-one meeting or telephone contact with the child or young person or seek further advice from the designated Child Protection Officer.

9.4.4 Staff members, volunteers, student ambassadors, mentors and others involved in the leadership or delivery of an event: i are not permitted to use instant chat on social networking sites; (Note: Facebook, Myspace and Bebo etc do not provide a log of conversations and could potentially leave an employee, ambassador or visitor open to allegations.)

ii will not use their own private Facebook page for communicating with students;

iii will not establish, or seek to establish, social contact (via social media, social networking sites or other media) with students/participants, for example, for the purpose of establishing a friendship or to pursue or strengthen a relationship;

iv will ensure that a separate, designated Facebook account is created for the purposes of the event/activity concerned;

v will not use abbreviations as these may be misconstrued by recipients or misinterpreted by parents;

vi should not use this designated account after 22.00 hours in order to preserve an appropriate degree of separation between their professional and personal lives;

vii in the case of group messages (messages sent to multiple children and or young people, for example, in connection with a specific activity or event) another adult should be copied into the message and where this is not done, the message should be logged and not removed.

9.5 The inappropriate use of social media or social networking sites may give rise to disciplinary proceedings.