

UCL Access and Widening Participation Office (AWPO)
Child Protection and Safeguarding Policy

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Abbreviations and definitions

CIR	Concern or Incident Report form
Disclosure	A report, verbal or written, made by a child or young person that they have been abused by someone.
DBS	Disclosure and Barring Service (formerly CRB – Criminal Records Bureau)
DSO	Designated Safeguarding Officer
LADO	Local Authority Designated Officer
NSPCC	National Society for the Prevention of Cruelty to Children
Regulated activity	Types of work with children and young people which require a DBS clearance
SA	Student Ambassador
TP	Taster Presenter
WP	widening participation
AWPO	Access and Widening Participation Office

1. Context of AWPO's work with children and young people

UCL AWPO (within Student and Registry Services) delivers activities for over 8000 children and young people annually, running over 100 separate events and programmes.

The safety and wellbeing of children and young people is the responsibility of all UCL staff and students working on UCL widening participation activities. Everyone working on UCL WP activities must follow this policy.

Everyone working on UCL WP activities must receive regular child protection training appropriate to their role, covering potential indicators of abuse, professional conduct for working with young people, a clear description of the responsibilities of their role in working with children and young people, how to respond to a disclosure, and how to report disclosures and child protection concerns.

This policy is reviewed annually and is publicly available at this link, with a copy of the concern or incident reporting form. www.ucl.ac.uk/wp/childprotection

An accompanying child protection procedure and supporting documents (full list in section ten) are available to AWPO staff.

Overview of UCL's WP activity with children and young people

- We deliver activities for primary and secondary school children. We also work with parents, guardians and teachers, mature students, and students in the first year of undergraduate study at UCL. Some activities are for specific audiences such as disabled young people or looked after children, who may have additional needs that should be factored into safeguarding measures.
- Our activities have varying frequency and intensity of contact. We run one-off single day events, non-residential and residential summer schools, and long-term programmes with students attending a regular series of activities throughout a school year.
- As well as delivering our centrally managed activities, we also fund and support UCL academic departments to deliver their own WP activities.
- This policy covers all activities run by AWPO at UCL or in externally booked locations, and activities run by UCL academic departments with the support of AWPO.
- Activities delivered in schools (out-visits) will also be covered by schools' own safeguarding procedures, and AWPO will comply with these as required.
- This policy does not cover activities for children and young people run by external organisations in booked UCL spaces.
- We also engage with children and young people online, through social media accounts, a blog, our website, and e-mentoring platforms.
- Many areas of the UCL campus are openly accessible to the general public. WP staff should be aware of this when planning and managing events.
- Children and young people travel to UCL and attend programmes in different ways. They could arrive in organised groups led by teachers, be accompanied by a parent, or travel to UCL independently. UCL is responsible for children and young people from the time they register at UCL until the time they leave, but is not responsible for them during travel to and from UCL.

2. Other UCL policies

The AWPO policy is publicly available at www.ucl.ac.uk/wp/childprotection

In addition to this policy, there are other UCL policies covering child protection and safeguarding.

UCL HR provide a policy on 'Working with vulnerable groups', which covers work with children, young people and vulnerable adults across the institution.

www.ucl.ac.uk/hr/docs/working_with_children.php

UCL HR provide a policy on conducting DBS (Disclosure and Barring Service) checks for the recruitment of staff working regulated activity requiring DBS clearance.

www.ucl.ac.uk/hr/docs/criminal_record.php

UCL Student Support and Wellbeing provide a Children and Vulnerable Adults Safeguarding policy. This covers children and vulnerable adults who are applicants to UCL or currently registered students at UCL.

www.ucl.ac.uk/current-students/support/wellbeing/safeguarding

3. Safeguarding procedures for AWPO staff

3.A Safer recruitment and Disclosure and Barring Service clearances

AWPO uses safer recruitment practices when recruiting staff. Most roles within AWPO include regulated activity with children and young people.

Job offers for new AWPO staff are conditional on the provision of two references, one of which must be the current or most recent line manager. A reference template which includes specific mention of child protection is provided. For roles including regulated activity, an enhanced level Disclosure and Barring Service (DBS) clearance certificate must also be provided. The certificate must include a check of the DBS 'Children's Barred' List. These requirements are stated in all job adverts, job descriptions, at interview and in job offers.

Knowledge of child protection is listed as essential or desirable in person specifications if appropriate for the role, and compliance with UCL's child protection procedures is listed as a core responsibility in job descriptions.

DBS clearance is required for all UCL staff working on 'regulated activity' with children and young people under the age of 18. Regulated activity is defined in the UCL DBS policy. It includes unsupervised or frequent activity with young people.

AWPO also hires temporary agency staff. If a DBS is required for work on regulated activity for a temporary staff member, it is requested and processed through the agency, and it must be an enhanced level DBS clearance which included a check of the DBS Children's Barred List. The agency must provide confirmation to AWPO in writing when they have seen and verified the individual's original DBS certificate.

AWPO staff who do not have DBS clearances because their role does not require it must not work on regulated activity.

The AWPO child protection procedure provides more detail on processing DBS applications for new employees.

3.B Child protection and safeguarding training for AWPO staff

New staff must be familiarised with this policy, the AWPO child protection procedure, and other relevant UCL policies as part of their induction within their first month.

All new AWPO staff, including temporary agency staff, must complete the Educare online training module on 'Child protection in education' within a month of their start date. Existing staff must repeat the module once every three years.

<https://www.educare.co.uk/educare-for-education>

It is the responsibility of all line managers in AWPO to ensure their staff follow this policy. Child protection and safeguarding measures must be considered when planning activities, and regularly discussed in staff meetings to ensure staff are applying procedures correctly in their work.

AWPO managers attend safeguarding training to support them with their Designated Safeguarding Officer responsibilities, with a refresher every three years.

Senior Access Officers and Access Officers working on regulated activities can also attend further safeguarding training on topics which can affect young people on WP programmes, such as mental health, FGM, forced marriage, homophobia and radicalisation.

4. Safeguarding procedures for casual student staff and alumni

As well as AWPO staff, children and young people on UCL WP activities are in contact with:

- Paid UCL student staff on casual 'as and when' contracts. These include student ambassadors (SAs – these are undergraduate and postgraduate students) and postgraduate taster presenters (TPs)
- UCL staff from other departments
- Volunteer guest speakers from external organisations for careers events, often UCL alumni

All new SAs and TPs must be interviewed before being offered work. They must attend a child protection training presentation delivered by an AWPO staff member, and sign a code of conduct form before they can start work. Code of conduct forms and training attendance dates are recorded. UCL student staff must attend an annual child protection refresher training and cannot work without doing so.

4.A DBS clearances and references for casual student staff working on regulated activity

An enhanced level DBS clearance which includes a check of the DBS Children's Barred List, and the provision of two references, is required for any casual student staff working on programmes that count as regulated activity.

As well as in-person activities, AWPO runs e-mentoring programmes, whereby UCL student mentors are matched to young people through an online mentoring service. E-mentoring programmes count as regulated activity, as the mentor and mentee can be in frequent and regular contact online. Therefore all e-mentors must have a DBS in place before they start.

Further detail on processing DBS forms for student staff is given in the AWPO child protection procedure.

4.B Casual student staff working on unregulated activity

For casual student staff and alumni who will only be working on unregulated activity, (one-off events with different groups of young people, for example campus tours and one-off talks at school visits, or events which are not frequent), references and DBS clearances are not required.

In line with the Rehabilitation of Offenders Act 1974, UCL does not have the legal right to request a DBS clearance for an individual if it is not required for an activity. For this reason, DBS clearances are not automatically requested for new SAs and TPs when they are first recruited, but only for individuals who are later selected to work on programmes which count as regulated activity.

5. Safeguarding procedures for UCL academic departments

5.A Support and guidance for academic departments

AWPO provides funding, guidance and support for UCL academic departments to deliver their own widening participation activities.

Staff from academic departments who are delivering their own WP activities must follow all the child protection and safeguarding procedures outlined in this policy and must be in regular contact with their supporting AWPO staff member.

Department staff must ensure that anyone working on their WP activity has received child protection training, has a DBS clearance in place (in line with section 3.A) for the start of the programme if required, and must ensure that appropriate communication and supervision procedures are in place.

AWPO staff can provide safeguarding support and guidance for academic departments running WP activities.

5.B Reporting child protection concerns from academic departments' widening participation activity

Any staff or students in academic departments who have a child protection disclosure or concern arising from a departmental WP activity must follow the reporting procedures in section seven of this policy. Departmental staff must not report or investigate child protection concerns within their own academic department.

6. Safeguarding procedures in relation to external organisations and individuals

AWPO partners with external organisations to deliver activities for children and young people. Activities can run at the UCL campus and also at other locations arranged by the external partner.

For all partnership working we request a copy of the external partner's child protection policy and provide them with ours. We review the partner's child protection policy to ensure there are no potential conflicts. If any potential problems are identified, these are discussed and an agreed joint approach agreed in writing between AWPO and the external partner in advance of the project.

For projects where AWPO commissions an external organisation to recruit participants, deliver and manage an entire project (with UCL's involvement limited to funding and monitoring), the external organisation is fully responsible for putting appropriate safeguarding procedures in place.

Staff from external educational organisations are also booked to teach on UCL delivered WP activities. If a booking is for a programme that counts as regulated activity, the external organisation will be expected to provide confirmation of DBS clearances for individuals teaching on the programme.

7. How to report disclosures and other child protection concerns

7.A Definitions of child abuse

A child is anyone under the age of 18. The following definitions of child abuse are from section 1.3 of the statutory guidance provided by the London Safeguarding Children Board, available at this link: www.londoncp.co.uk/chapters/responding_concerns.html#def

“Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another e.g. where there is domestic violence and abuse;
- Serious bullying, causing children frequently to feel frightened or in danger;
- Exploiting and corrupting children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by

penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

In addition; Sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under s5 Sexual Offences Act 2003.

Neglect

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health or learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.

Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.”

7.B Standards of professional behaviour for UCL staff working on widening participation activities

- Staff must understand that it is their responsibility to safeguard and promote the wellbeing of children and young people
- Staff must understand and follow UCL's child protection policy, and keep up to date with child protection training as required for their role
- Staff are responsible for their own actions and behaviour, and must avoid any conduct which could lead a reasonable person to question their suitability to work with or to be an appropriate role model for children and young people
- When supervising the work of UCL casual student staff, staff must always provide a model of appropriate professional boundaries and provide guidance on appropriate conduct for working with children and young people as required
- Staff must work and be seen to work in an open and transparent way
- Staff must acknowledge that false allegations of child abuse are extremely rare, and that all concerns must be reported and recorded
- Staff are in a position of trust in relation to children and young people attending WP activities. They must not:

- develop personal relationships with children and young people or their families
- discuss their personal lives with children and young people
- meet or arrange to meet children and young people or their families privately away from planned UCL activities
- exchange personal contact details with children and young people or their families, or connect with them through social media accounts

7.C Examples of child protection concerns that must always be reported

7.C.1 Possible signs that a child or young person is suffering abuse

- Direct disclosures of any type of abuse – verbal, emotional, physical, sexual, neglect, or bullying – carried out by anyone connected to the child or young person. This could be someone in their family, someone at their school, someone on the UCL WP activity or another youth programme run by a different organisation. Abuse disclosures can be current or historical. Children can be abused by other children or young people as well as by adults.
- Third party disclosures (a disclosure about abuse happening to someone else)
- Other possible indicators that a child or young person that could be being abused, for example:
 - Saying they want to tell you something but only if you keep it a secret
 - Written hints about abuse for example in homework or e-mentoring conversations
 - Self-harm marks, bruises, burns or other injuries*
 - Signs of disordered eating, anxiety or serious depression*
 - Sudden or severe change in behaviour, for example becoming very withdrawn when they had previously seemed confident and happy
 - Serious aggression or inappropriate behaviour towards other children and young people or UCL staff
 - Worrying language such as excessive swearing or sexualised comments
 - Seeming very anxious about going home at the end of an activity, or afraid of UCL staff calling their parents
 - Talking about being pregnant, or having an older girl or boyfriend

*It is noted that AWPO staff may also notice causes for concern in UCL student staff working on WP activities, for example self-harm marks, signs of disordered eating, possible signs of anxiety and depression.

AWPO staff have a duty of care to all UCL students working for on our programmes, as well as to children and young people. If a staff member is worried about a student, they can direct them to UCL Student Psychological Services who provide counselling and a range of other services. If a staff member has a serious concern about a UCL student, they should report it to UCL Student Wellbeing through the Student of Concern form.

www.ucl.ac.uk/current-students/support/wellbeing/student_of_concern

7.C.2 Possible signs that someone working on UCL WP activity whether UCL staff, student, alumni or an external individual) may be developing an inappropriate relationship with a child or young person

- They are seen interacting with a child or young person on social media, or have photos of them on their phone
- They are seen exchanging contact details or meeting them alone outside of a UCL WP activity
- They are seen having private conversations with them away from the main group without other people present
- They are overheard having inappropriate conversations with them, for example about their romantic life
- They are seen giving gifts to them
- They are seen kissing, hugging or touching them

7.C.3 Concerns that you as a UCL staff member or other UCL staff might be open to allegations of inappropriate conduct towards a young person

- If you are working on a UCL WP activity and are concerned that a young person is becoming attracted to you, for example repeatedly trying to contact you on social media, asking for your contact details, asking to spend time with you privately or trying to touch you
- If you are working on a UCL WP activity and are concerned that a young person could have misunderstood or misinterpreted something you have said or done

Please note that this is not an exhaustive list. If anyone working on a WP activity encounters something that makes them feel concerned, but which doesn't exactly match the situations listed above, they should still report it.

7.D Reporting disclosures or other child protection concerns

- Any disclosures or child protection concerns about children and young people on UCL activities must be reported promptly using the reporting lines in this section.
- If something happens on UCL premises which requires an emergency response, staff should call UCL Security immediately on 222 (from a UCL phone) or 0207 6792222 (from any other phone). Calling 999 instead can result in the response being delayed. UCL Security will contact the emergency services as required. Once the immediate emergency has been dealt with, staff should then follow the reporting procedures as necessary.
- Safeguarding contacts for UCL HR and AWPO are listed in section 7.D.
- Child protection concerns which could involve a potential allegation against a UCL staff member (including UCL student staff) must be reported directly to UCL HR, not to AWPO.
- All other disclosures or concerns which do not appear to involve a potential allegation against a UCL staff member must be reported to AWPO. All AWPO Access Managers and the Head of Access are Designated Safeguarding Officers (DSOs) for WP activities.
- If parents / guardians or teachers of young people on WP activities need to report a child protection concern related to the activity, they should contact an AWPO DSO as soon as possible.
- A Concern or Incident Report (CIR) form must be completed for any child protection concern, by anyone who was involved. Paper forms are available on all WP activities, and an electronic copy is available at the AWPO website (www.ucl.ac.uk/wp/childprotection). CIR forms and other documentation related to

child protection reports are confidential. UCL HR or AWPO will keep confidential paper files of any concerns stored securely in their offices. Paperwork will be destroyed in line with UCL's data retention policy.

- All WP activity must have an assigned DSO. The staff member running the activity must have the mobile numbers of all the DSOs. The staff member must call their DSO if they need to report something, or need safeguarding guidance. If a staff member needs help but their assigned DSO is not responding, they must then contact the other DSOs until they have a response.

7.E Contacts for reporting disclosures and child protection concerns

UCL AWPO Designated Safeguarding Officers (DSOs)

Any disclosures or child protection concerns on UCL WP activities must be reported to these contacts (unless the concern involves a potential allegation against a UCL staff member (including UCL student staff), in which case it is reported to HR).

- Robin Barrs - Head of Access - r.barrs@ucl.ac.uk - 020 3108 8266
- Caroline Fionda-Dedman – Access Manager (Teacher and Academic Liaison) - c.fionda@ucl.ac.uk - 020 3108 8271
- Alison Forbes - Access Manager (Post 16) - alison.forbes@ucl.ac.uk - 020 3108 8267
- Lucie March - Access Manager (Communications and Planning) - l.march@ucl.ac.uk - 020 3108 8281
- Jennifer Whitney - Access Manager (Pre 16) – j.whitney@ucl.ac.uk – 020 3108 8243

UCL HR Safeguarding contacts

Any disclosures or child protection concerns involving a potential allegation against a UCL staff member (including UCL student staff) must be reported to these contacts, but a WPUKUGRO DSO must also be copied in to the report.

- Claire Rowlinson – Principal HR Business Partner - Safeguarding Contact
c.rowlinson@ucl.ac.uk - 020 3108 8854
- Fiona Ryland – Executive Director of HR — – Nominated Officer (Safeguarding)
0203 108 8816 f.ryland@ucl.ac.uk

Camden Local Authority Child Protection Services

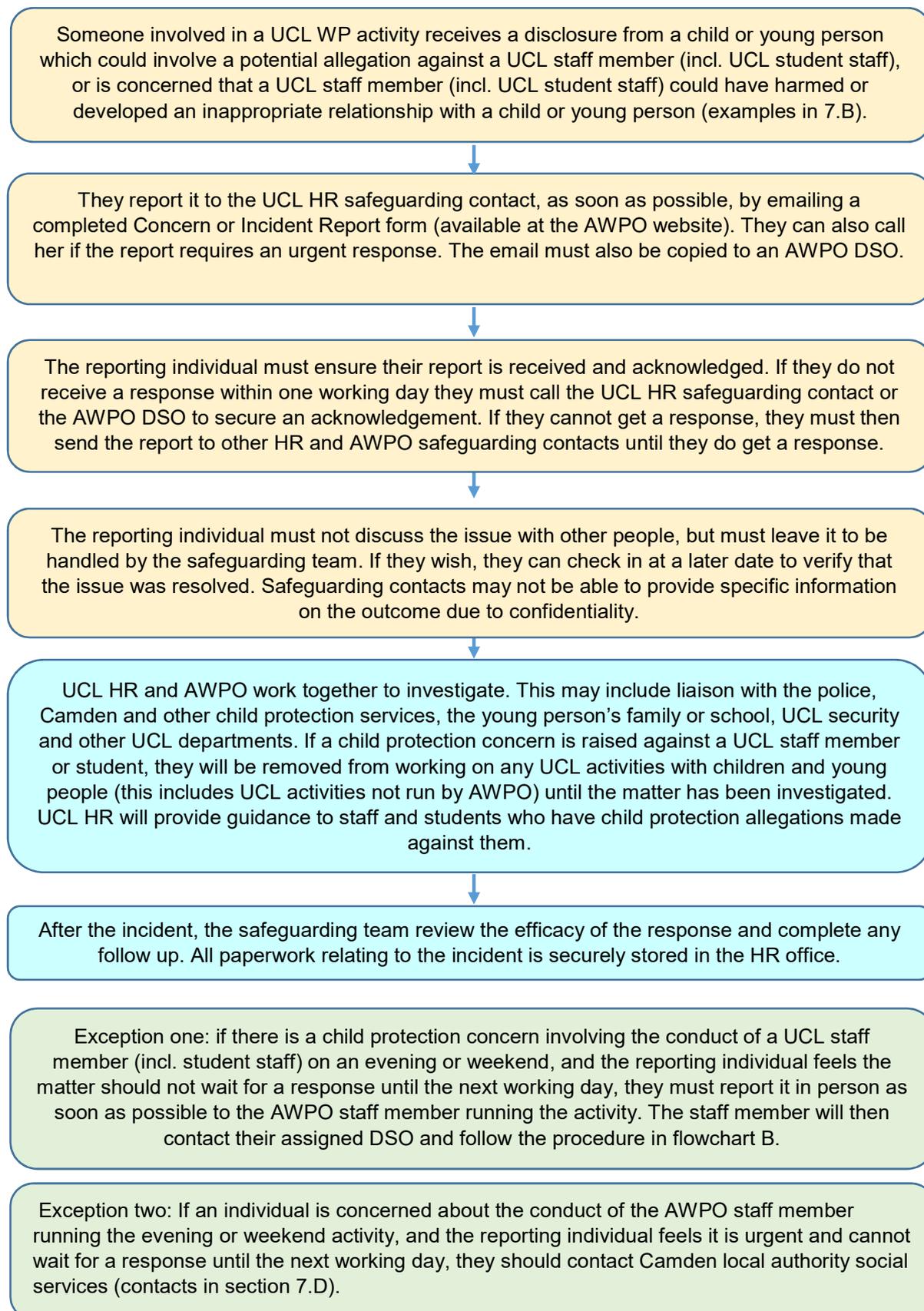
www.cscb-new.co.uk/

Camden Child and Family Contact Services, 9th Floor, 5 St Pancras Square, London, N1C 4AG. Telephone: 020 7974 3317 (9am to 5pm). Out of Hours Telephone: 020 7974 4444

Additional guidance on child protection and safeguarding

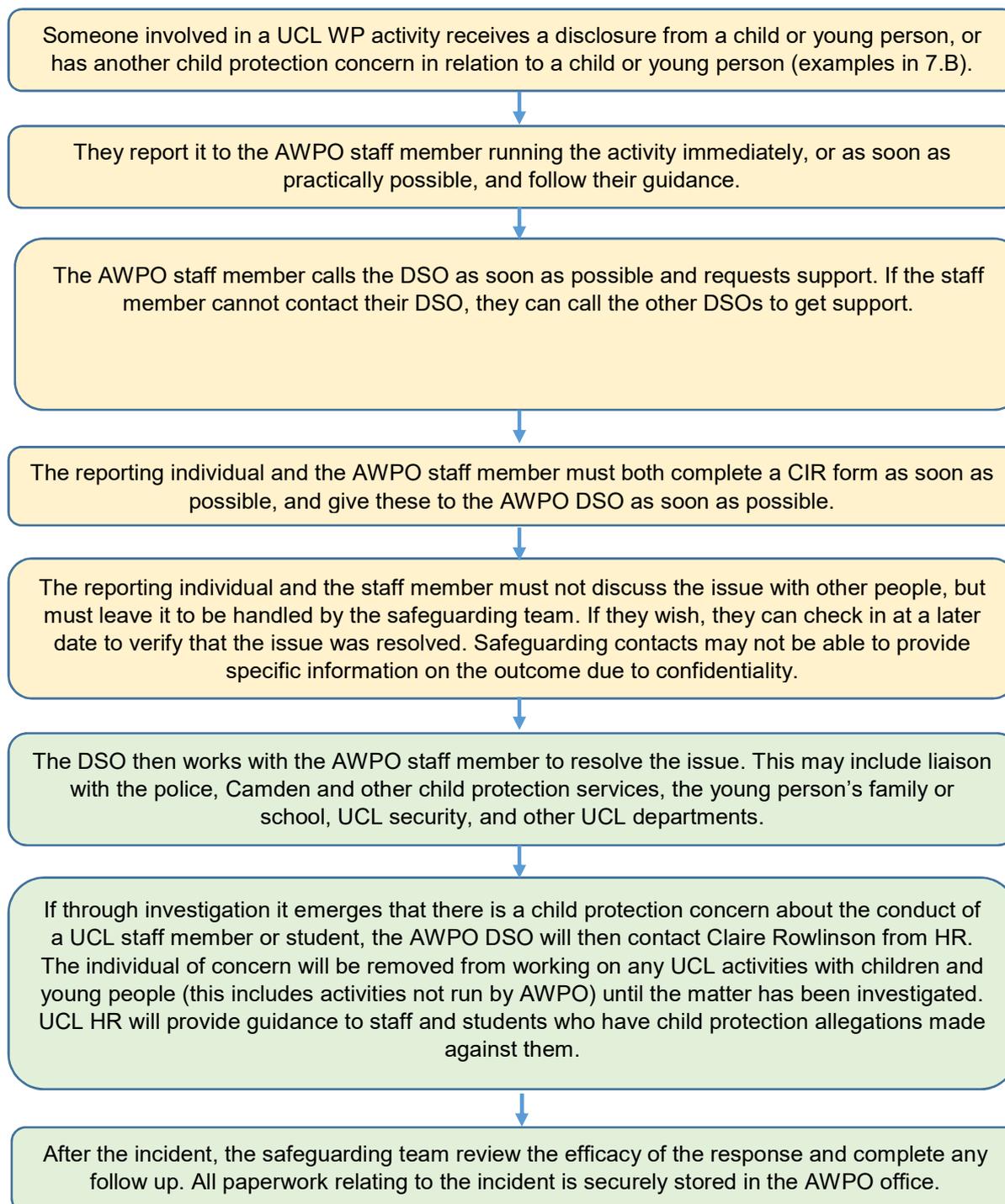
The NSPCC runs a 24 / 7 advice helpline and an email service for child protection concerns: 0808 800 5000 - www.nspcc.org.uk - help@nspcc.org.uk

7.F Flowchart A: Disclosure or child protection concern which could involve a potential allegation against a UCL staff member (including UCL student staff) – Report to HR



Other situations to report: If a UCL staff member (incl. student staff) has reason to be concerned that they might be open to allegations of inappropriate conduct (see section 7.B.3), they must complete a CIR form and report to a AWPO DSO, who will provide guidance.

7.G. Flowchart B: Disclosure or child protection concern which does not involve a potential allegation against a staff member or student – Report to AWPO



8. Communication with children and young people, parents and teachers

Contact with children, young people, parents / guardians and teachers attending WP activities is primarily managed through UCL staff email accounts, UCL office phones and AWPO mobile phones.

Everyone working on UCL WP activities is instructed not to share personal contact details or to interact on social media platforms with children and young people, or their parents / guardians. This includes personal mobile phones, home phone numbers, personal email accounts, personal social media accounts and UCL student email accounts (only UCL staff may contact participants through UCL email accounts).

AWPO maintains 'Discover UCL' social media accounts on Facebook (www.facebook.com/discoverUCL), Twitter (<https://twitter.com/DiscoverUCL>) and Instagram (www.instagram.com/discoverucl). Children and young people and SAs are encouraged to follow and interact with these accounts. However, SAs must not accept friend requests from children and young people who may easily find them through these accounts.

For some programmes, SAs will be in contact with children and young people through virtual learning environments or e-mentoring platforms such as Brightlinks (www.brightlinks.org). These platforms are used for a set period of time and purpose, and are moderated by Brightside or AWPO staff. SAs receive training on using these sites, and are not able to share personal contact information with young people through them.

9. Supervision of children and young people on activities

AWPO follows NSPCC guidance on the minimum appropriate ratio of adults to children or young people¹ for youth programmes:

- 9 - 12 years: one adult* to eight children
- 13 - 18 years: one adult to 10 children.
- If the group is mixed gender, the supervising staff should also include both male and female workers wherever possible.

*'Adults' includes UCL SAs as well as AWPO staff. Many programmes have higher ratios than the minimum requirement, to provide a high quality experience for our participants.

AWPO has detailed procedures on enrolment, supervision, expected behaviour, registration and departures to ensure children and young people are safe and are appropriately supervised during all UCL WP activities. These are outlined in the child protection procedure accompanying this policy. AWPO is responsible for the safety of children and young people from the point of registration until they sign out and depart. UCL is not responsible for the safety of children and young people as they travel to and from UCL activities. This is made clear to participants, teachers, and parents / guardians in the enrolment procedure.

Online risk assessments are in place for all UCL WP activities in advance of the start date, available through the UCL RiskNET service. <http://www.ucl.ac.uk/estates/safetynet/>

¹ <https://www.nspcc.org.uk/globalassets/documents/information-service/factsheet-recommended-adult-child-ratios-supervising-children.pdf>

A risk assessment for general school visits is available on the AWPO website for the reference of schools bringing groups of students to UCL.

10. Supporting documentation list

1. Child Protection and Safeguarding Procedures document
2. Concern or incident reporting form
3. Code of conduct form for UCL student ambassadors
4. Code of conduct form for UCL taster presenters
5. Child protection and safeguarding training presentation for UCL student staff
6. Combined code of behaviour for children and young people and parental / guardian consent form
7. Reference request templates for AWPO staff and casual student staff
8. Safeguarding checklist for staff
9. Risk assessment for general school visits