

University Allocated Residences: Under 18's policy and Safeguarding Risk Assessment

1. Purpose

The University of Bristol has a duty of care towards all its students. In the case of students joining the University before their 18th birthday, this duty is enhanced as such students are regarded as children under UK law. In order that families can be assured of the University's commitment to the safety and well-being of younger students, this document has been produced as a guide to the level of care provided by the institution within University Residences. If a Student is under 16 at the time of admission to the University, the Parent is required to provide residential accommodation.

Students and their families should bear in mind that the University of Bristol is an adult environment. Students are expected to behave like adults and to assume an adult level of responsibility. Universities in the UK do not provide the same level of supervision as universities in many other countries. Students are expected to have the necessary skills to study and live independently alongside people from a wide variety of backgrounds. This can be particularly challenging for younger students. The University is not in loco parentis i.e. it is not in the same position as a parent and does not accept that level of responsibility for its students. For this reason, if a student's parents are not resident in the UK, it will be necessary for them to appoint a guardian in the UK and provide contact details for this person and their informed consent to acting in this capacity.

Students who are over the age of 16 and under the age of 18 have the legal capacity to enter into contracts for education and necessary accommodation and will be liable for fees and charges payable under those contracts. Full details of the University's conditions for under 18's have been stated in the Parental Declaration Form required by the University's Admissions Office for all under 18's applications: <http://www.bristol.ac.uk/media-library/sites/undergraduate-applicants/migrated/documents/parent-consent-under-18s2017.pdf>

Although those under 18 are regarded as children under the law, they still have the right under the Data Protection Act for information about them not to be disclosed without their consent. This means that the University is not able to give information to parents unless the student has given their specific consent.

The under 18's policy will apply to all students under 18 living in accommodation owned by or directly leased by the University of Bristol from a third party accommodation provider. Both owned and leased accommodation are referred to as University allocated accommodation. This policy is intended to be read in conjunction with the University of Bristol Safeguarding Policy.

<http://www.bristol.ac.uk/secretary/legal/safeguarding/>. This under 18's policy will not apply to students once they reach their 18th birthday. This policy does not apply to students who are under 18 when they apply but reach age 18 before they arrive at the University of Bristol. References in this section to a "Parent" include guardians or other responsible adult nominated by the parent or guardian as representing the student's interests whilst the student is at the University. References in this policy to "Students" are to students to whom this policy applies (i.e. under 18's), unless stated to the contrary.

This policy does not apply to persons under 18 who use the University's Residences during vacation time following a booking made with the Conference Office or to children of students residing in University allocated accommodation. These categories are covered in the University's Safeguarding Policy <http://www.bristol.ac.uk/secretary/legal/safeguarding/>.

2. Scope

All University Allocated Residences

3. Procedure

3.1 The accommodation

Students who are under 18 are not accommodated differently to other students within University accommodation. They are subject to the same eligibility criteria and allocation process although their age is taken into account when an allocation is made. Details of which can be found at:

<http://www.bristol.ac.uk/accommodation/undergraduate/apply/>

All students entering into University accommodation are required to sign a contract to accept the terms and conditions of the accommodation (known as the Residence Conditions

<http://www.bristol.ac.uk/accommodation/media/docs/residence-conditions.pdf> and the Residences Guide <http://www.bristol.ac.uk/accommodation/current/undergraduate/your-accommodation/>), along with the

University's Rules and regulations <http://www.bristol.ac.uk/media-library/sites/secretary/documents/student-rules-and-regs/student-disciplinary-regulations.pdf>.

The regulations clearly state the level of acceptable behaviour and the sanctions imposed if not adhered to. A senior resident within the Residential Services pastoral team will ensure that each resident under the age of 18 is informed of this policy and signs to confirm acceptance (Appendix A) as part of their Welcome induction.

Student accommodation areas are predominantly for the use of the students to whom they are allocated and their guests, however there will be occasions when they will be required to share parts of the accommodation excluding bedrooms with conference guests, summer school students or similar University sanctioned visitors. The accommodation provided is secure and meets necessary fire and safety legislation. In addition to a study bedroom, a suitable facility for catering is provided (kitchen utensils are not provided). Bathroom and toilet facilities are provided within adequate ratios (excluding en-suite provision).

Students are not fully supervised during their free time in the accommodation, however comprehensive information is provided to all students on who to contact if necessary either in or out of hours. The campus is essentially an adult environment and it may not be possible to provide the level of supervision parents consider appropriate.

CCTV provision within the Residences is located only in communal areas, i.e. lobbies and laundrette. The cameras are intended for security only and not to breach the privacy of any student.

3.2 Support and guidance

All students at the University of Bristol have access to a very comprehensive support system. Within the accommodation there are Wardens who provide out of hours support and welfare. For more specific needs students are encouraged to visit Student Services. Information on their services can be found at:

<http://www.bristol.ac.uk/student-services/>

The University of Bristol has guidance regarding dealing with unacceptable behaviour.

<http://www.bristol.ac.uk/equalityanddiversity/acceptablebehaviour/abstudents.html>

Residential Services has a documented local complaints management system procedure which is in line with the University's complaint procedure <http://www.bristol.ac.uk/media-library/sites/secretary/documents/student-rules-and-regs/student-complaints.pdf>

When information on a student's health or welfare in relation to their Residential requirements is provided to the University either by the student or with their explicit consent, appropriate records are kept securely and appropriate support provided. Access is limited to only those individuals who need to have the information in order to provide such support.

Appropriate first aid and minor illness treatment is available to students at University, with access to medical and dental services as required. All students are encouraged to register with the Student Health Service. Residential Services staff are encouraged to train as first aiders and are given appropriate out of hours emergency services information.

Students who are 16 or over have the legal capacity to consent to medical treatment. Parents/guardians must be aware that the University therefore cannot provide any consent for emergency medical treatment for a student. Students who are under 18 may have any refusal to consent to life-saving treatment overridden by a parent, but the views of the child must be taken into account. Emergency contact details must therefore be provided to the University prior to the student's arrival. In such circumstances, decisions about treatment and treatment itself will be a matter for the medical practitioners.

If a student or staff member has any concern about the welfare of an under 18 student these should be reported to the Director of Student Services, who is the University's designated safeguarding lead for students. <http://www.bristol.ac.uk/secretary/legal/safeguarding/>

3.3 Residential Services and its staff

All reasonable measures are taken to ensure as far as is practicable that current laws on the purchase and consumption of alcohol, and in relation to possession, sale and use of drugs, are complied with by students of all ages while accommodated by the University. In particular photographic ID lists of all students aged under 18 will be held behind the Bar of their residence and they will not be served any alcoholic drinks. These lists will be regularly updated by the Student Support Administrator.

There is a clear management structure within Residential Services. All staff employed by University of Bristol are subject to terms and conditions which cover probationary and disciplinary procedures. All staff in Residential Services have clear and defined roles both in respect of residential experience and welfare duties.

The University is registered with the Disclosure and Barring Service (“DBS”) and will ensure that any member of staff or any student who will have regular one-to-one contact with under 18’s will be checked for relevant criminal convictions. Each student has one or more members of staff to whom he or she can confidentially turn for personal guidance or with a personal problem. DBS checks are carried out on all members of the Residential Life team (Wardens, Deputy Wardens, Student Support Administrators, Senior Residents) within University owned and third party provider residences. DBS checks are carried out on all other relevant members of Residential and Hospitality Services staff where required. Our third party providers don’t currently require a DBS check due to the nature of their role, but are working toward a similar provision for their staff in relevant roles.

All of the above provided information is relevant to University Allocated Accommodation only. The University does not monitor these terms with landlords who provide private accommodation or lettings.

3.4 The University's responsibilities to students under the age of 18 years

The University will:

- Offer accommodation to all those students who fulfil the criteria set out in allocation policy.
- Give priority choice of accommodation to students who qualify for the guaranteed accommodation in line with our accommodation guarantee.
<http://www.bristol.ac.uk/accommodation/undergraduate/guarantee/>
- House students in accommodation close to or where there is easy access to a member of the pastoral team.
- Provide documentation, including a Tenancy Agreement and Regulations Booklet, to the student that is required to be accepted before the student can take up residence.
- Ensure that staff will only enter student bedrooms acting in accordance with the Residential Services agreed access policy.
<http://www.bristol.ac.uk/accommodation/media/docs/access-policy.pdf>
- Provide relevant training and guidance for accommodation staff employed by the University, room key holders and staff with regular access to study bedrooms and emphasise that all of them have a responsibility to report concerns.
- Treat sympathetically any requests for a change of room within the University accommodation (always subject to availability and suitability).
- Ensure that students are aware of whom to contact in case of difficulties, and ensure that students have means of ensuring confidentiality where they wish it. The University will try and encourage students to involve a parent where appropriate. We will normally respect a student’s request regarding confidentiality, however, circumstances may dictate that we have to disclose personal data in the best interests of the student or others. Such decisions will always be made in accordance with the Data Protection Act.

Take seriously all suspicions and allegations of abuse and respond swiftly and appropriately, following the University’s Safeguarding Policy. This could result in contacting official authorities e.g. police, social services etc. <http://www.bristol.ac.uk/secretary/legal/safeguarding/>.

The University will not:

- Carry out DBS checks for contractors attending to irregular ad-hoc repairs within the residences. All contractors will, however, be required to carry identification and will carry out repairs/works between 9.00 am and 5.00 pm except in an emergency situation. The University will make students aware of the requirement for contractors to carry identification and of their normal working hours.
- Act in Loco Parentis or provide direct supervision of a student

- Carry out DBS checks on other students unless they are a Senior Resident – even where the student(s) is/are over the age of 18.
- Monitor how the student spends their leisure time or manages their finances.
- Inspect or monitor any accommodation which is not managed by the University.
- Intrude unnecessarily on students' reasonable privacy.

3.5 Students' responsibilities to the University

Students will:

- Provide ID, including proof of age, when requested to do so by Residential Services staff or nominee.
- Be required to enter into a standard-form accommodation contract with the University and abide by its terms and conditions (including discipline) and abide by Policy and related procedures.

4. Communication

5. Training

N/A

6. Responsibility

Head of Student Residential Life

7. Applicable to:

All pastoral staff within University Allocated Residences

8. Definitions / Descriptions

N/A

9. Related Documentation

This document should be read in conjunction with the University of Bristol Safeguarding Policy <http://www.bristol.ac.uk/secretary/legal/safeguarding/> and Under 18's policy <http://www.bristol.ac.uk/applicants/applied/under-18s/>

10. Distribution

All RHS staff

All under 18 students within University Allocated Residences

Appendix A

Acknowledgement of policy from under 18 student

Dear Student,

I am pleased to welcome you to your new residence at the University of Bristol. Because you are under 18 at the start of session, it is essential that you are fully aware of the University of Bristol's Residential Services Policy for housing students under 18 years of age.

As your Senior Resident it is my responsibility to ensure you have read and understood the policy as part of your induction to Residences. This acknowledgement slip is a record of our meeting on _____ to discuss this policy, and will be kept by the SSA on your student residences record for 2 years.

Student declaration:

My signature below indicates that I have received the University of Bristol's Residential Services Policy for housing students under 18 years of age, and understand how this applies to me until I reach the age of 18.

Student Name (please print):

Date of Birth:

Student Signature:

Dated:

Hall of Residence:

Flat Number:

Senior Resident Name (please print):

Senior Resident Signature:

Dated:

Appendix B

Safeguarding Risk Assessment

A risk assessment has been developed with the goal of minimising risk to both students and staff, as the University's Safeguarding Policy recommends that risk assessments be undertaken.

University residences operate within two distinct strands: pastoral and facilities. Safeguarding will cross both.

In order to implement a thorough risk assessment, there needs to be a clear reporting procedure for facilities staff such as cleaners to report concerns to tier 2 staff as appropriate (in 2017/18 the named Tier 2 member of staff for Residential and Hospitality Services is Caroline Court, Head of Student Residential Life).

Draft template

The following is an example, based upon the University's standard risk assessment template. This is a draft and it is **recommended that the Warden, SSA and Accommodation Manager adapt the risk assessment to suit any specific under 18 students in their Residence to address potential risks** (for example a residence split into flats may have different cleaning arrangements than one based on a student rooms on a corridor layout).

The Warden and/or SSA are required to complete a risk assessment, with the Accommodation Manager, or Partnership Manager for their Residence only when they have students under the age of 18 in the Residence. Mitigating actions agreed must be communicated to all relevant parties within the Residence.

Description of hazard	Who might be harmed	What is the risk?	Action
Extended regular contact through cleaning duties	Young people & adults at risk	Risk of close relationships developing	Staff member to be clearly advised of the remit of the role by their supervisor. Staff member to read the Safeguarding Policy guidance on contact with young people or adults at risk (<i>NB: guidance to be written</i>).
Lone working in residences	Young people & adults at risk	Risk of prolonged time alone with a vulnerable student	Staff member to avoid prolonged 1:1 conversations. Staff member to refrain from accessing student bedrooms.
Working in shared bathrooms	Young people & adults at risk	Risk of inappropriate contact	Bathrooms must always be checked for occupancy before entering. Doors must be left open during cleaning.
Student may disclose abuse or staff member suspects abuse	Young people, adults at risk & anyone in contact with that person	Abuse is not reported and may continue. Other students may be at risk.	Staff member to discuss concerns with their supervisor without delay. Supervisor to follow agreed reporting procedure (<i>NB. this may or may not already exist</i>).
Staff member witnesses abuse	Young people, adults at risk & anyone in contact with that person	Student is at immediate risk. Abuse is not reported and may continue. Other students may be at risk.	Staff member to report the abuse with their supervisor without delay. Staff member to follow emergency guidelines if a student is at immediate risk (ring 999 and then Security Services)

Students are upset and would like comforting	Young people & adults at risk	Risk of developing close and inappropriate relationships	Staff member to signpost students to appropriate pastoral support and report this to their Supervisor.
Students wanting to contact cleaning staff	Young people & adults at risk	Risk of close relationships developing	Staff member should not give out personal details or social media information. Students should be pointed towards maintenance/need for cleaning reporting procedures.
Inappropriate behaviour by staff member is suspected	Young people, adults at risk & anyone in contact with that person	Risk of abuse to alleged victim and other students	Following the Safeguarding guidance, concerns to be reported to an appropriate tier 2 or 3 member of staff without delay.
Inappropriate behaviour by a vulnerable student	Young people, adults at risk & staff member	A vulnerable student may wish to develop further relationships with a staff member	Staff member to report this to their Supervisor without delay. Supervisor to raise concerns with appropriate pastoral residence team member.

 University of BRISTOL <i>Residential and Hospitality Services</i>	University Allocated Residences: Under 18's policy and Safeguarding Risk Assessment
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Version control table

Name of Document					
Version number	Purpose/Changes – brief description	Author	Date	Approved by	Date
1.0	Publication of 2016/17 procedure	HoSRL	Sept 2016	HoSRL	Sept 2016
1.1	Review of 2016/17 procedure with Student Services for 2017/18	HoSRL	Aug 2017		
2	Final version for 2017/18	HoSRL	Sept 2017	HoSRL	Sept 2017
3					