Nuffield Future Researchers

Online Safeguarding Policy

This policy is an updated version of the original Nuffield Research Placements safeguarding guidance.

Overview

Increasingly during this pandemic, teaching and learning are taking place online. This approach has been relatively common in higher and further education for many years but has rarely featured in school-based education and has not always been applied consistently. While we must deal with the immediate situation, it is likely that the way in which young people engage with learning and their teachers may change for good. Given the current experience of online learning, the education system will be challenged to better embed such approaches when face-to-face schooling resumes.

Technology is a vital element to helping young people to continue to learn and develop; we should be aware that there are significant safeguarding issues to address. These affect teachers, coaches and mentors just as much as the young people and their parents and carers. We have given some thought to how to safely manage interactions between adults and young people online, to ensure that everyone feels safe and secure with these changing working arrangements.

The National Society for the Prevention of Cruelty to Children (NSPCC) has recently updated its guidance to account for this period, in which much learning and interaction with young people will take place online. You can find this information here – what follows in this document corresponds with the views of the NSPCC.

Introduction

This policy offers advice about steps that should be taken to ensure that projects are organised and managed in line with the best interests of the participating students. It also provides reassurance to project supervisors that risks to themselves when delivering these great opportunities have been accounted for and evaluated. Organisations supervising students range from laboratories to business environments, and students may be working in groups, with teams or, sometimes, alone. The guidance offered here needs to be balanced against any requirements that project supervisors and the organisations they work for may have.

Health and safety

While the student is under the care of the project supervisor, they are owed a duty of care due to the student’s age and temporary status with the project supervisor.

The project supervisor should continue to monitor whether the student is fully capable of working on the project with due safety; not only to the student themselves but also to others who may be affected by the work of the student.

For students up to the age of 18 on projects across the UK:

- A risk assessment is required under the young persons’ regulations on health and safety (http://www.hse.gov.uk/youngpeople/workexperience/placeprovide.htm).
  - Given that the work will be undertaken at the student’s home, a risk assessment that outlines considerations and guidance provided to students in relation to remote working can be provided to all project supervisors.
  - Should the project supervisor need to add additional considerations to the risk assessment, they should ensure this template is completed in full.

For students over the age of 18, the usual UK health and safety workplace arrangements apply. Students with special educational needs and disabilities (SEND) may apply for and secure a project. In such cases, the host must be made fully aware of the nature of the learning or physical needs of the student. As with any employer or project host, it is required that an assessment be made around whether appropriate steps can be taken to make the project safe and suitable for a student who has SEND.

Managing a placement

Once the project is agreed in principle, the project supervisor and appropriate Nuffield Future Researchers regional coordinator must agree on:

- The activities the student will undertake,
- The areas of the organisation, such as any areas of an intellectual nature, which are ‘out of bounds’ to the student,
- Whether any information to be handled by the student is sensitive (either personal or professional) and whether particular data management principals need to be set out or enhanced – or whether non-disclosure or commercially sensitive requirements are needed,
- Whether special arrangements or care needs to be taken by the project supervisor in respect of the student’s physical, medical or intellectual needs,
- The student’s briefing, supervision and reporting arrangements,
- A reporting process, in the event that the student is involved in an incident.

In the event of an incident taking place that affects a student in such a way that safeguarding may be an issue, the following steps may need to be followed:

1. **Obtain a statement from the student (via the regional coordinator)**
2. **Obtain a statement from the other party (via the project supervisor organisation)**
3. **Compare perspectives and refer to relevant policies to decide on one course of action. Either...**
   - (a) Escalate and move student to a new project (if appropriate and time allows) while investigation continues under host’s procedures
   - (b) Resolve matter and agree new or alternative supervision arrangements for the project to continue.

The above ‘flow’ of actions has worked well in practice. Accurate recording of actions taken and conversations held are important and a very useful way of checking that everyone involved has a shared understanding of steps taken and what has transpired.
Online Safeguarding

Project supervisors are often concerned (for their staff and the students) about safeguarding. As most students on projects are over 16, safeguarding regulations are not generally applicable. The Department for Education (in England) note that enhanced disclosure and barring service (DBS)\(^1\) checks are not required for project supervisors where the employers or staff are supervising young people aged 16 to 17 on work experience.\(^2\)

Please note, however, that Nuffield students on projects should always have access to a named safeguarding contact within the host establishment and to their Nuffield Future Researchers regional coordinator.

While ‘barred list’ checks might be required when working with a student under the age of 16, project hosts might feel it best to develop a view of the risks involved in hosting a student when the person providing the teaching, training, instruction or supervision will be:

- Unsupervised themselves, and/or
- Providing the teaching, training or instruction frequently (more than three days in a 30-day period, or overnight).

Project supervisors may decide that their staff should be subject to disclosure checks or that, having assessed potential risks to both parties, they will put in place additional control measures to eliminate these risks. Supervisors may wish to undertake some dedicated professional development on safeguarding. The NSPCC offers an online course (https://learning.nspcc.org.uk/training/child-protection-schools) for £25, which will be useful in any school-focused outreach work project supervisors may undertake. Any additional costs incurred from further training or disclosure checks will need to be covered by the project supervisor’s organisation.

If required, reference can be made to external bodies, such as:

**England and Wales:** [https://www.gov.uk/government/organisations/disclosure-and-barring-service](https://www.gov.uk/government/organisations/disclosure-and-barring-service)


**Scotland:** [https://www.mygov.scot/about-disclosure-scotland/](https://www.mygov.scot/about-disclosure-scotland/)

Project supervisor host organisations may have additional requirements when working with young adults. These may go beyond legislative requirements – but they should also be observed.

It is important to remember that incidents can be seen very differently by the involved parties and that the safety of the under-18 student and a fair outcome need to be the twin goals in these circumstances.

**Guidance on appropriate action**

Nuffield Future Researchers’ regional coordinators should ensure that project supervisors, schools and students have access to this policy on associated health and safety and safeguarding guidance.

Project supervisors should also notify their Nuffield Future Researchers regional coordinator of any additional requirements, including where additional disclosure checks are needed. The time required to complete this will have to be built into project planning and needs to be carried out by the project host.\(^3\)

Project supervisors and their Nuffield Future Researchers regional coordinator should ensure that a copy of the risk assessment for each project has been uploaded to the online system.

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\(^1\) Formerly, Criminal Record Bureau (CRB) checks.


\(^3\) The STEM Ambassadors programme offer a free DBS checking service to organisations with employees are undertaking STEM volunteering activities. [https://www.allaboutstem.co.uk/2018/03/stem-ambassador-dbs-id-check-sessions/](https://www.allaboutstem.co.uk/2018/03/stem-ambassador-dbs-id-check-sessions/)
As communications between students and project supervisors are taking place within a Virtual Learning Environment (VLE), here are some directions for both students and project supervisors:

1. Ensure all communication only occurs via the VLE.
   a. Within Google Classroom, the chosen VLE, there is a chat function, an email-style notification function and video/audio teleconferencing function. We believe these will cover all communication needs.

2. We ask that you agree that any video/audio conversations are recorded.
   a. This is in lieu of an ‘open door’ policy when it comes to meetings and allows for a communications trail that will protect both the student and the project supervisor.
   b. Please note that, after the meeting, any recordings will be available to attendees of the teleconference only. Your regional coordinator will not have access to the recordings nor will they be monitoring them. However, should the recordings need to be reviewed for any reason, the Nuffield Foundation staff have administrative access – only when required.

3. Find spaces to communicate from that do not reveal your personal information or display things that you may not wish others to see.
   a. Bedrooms are less than ideal but, if this is your only option, do be aware of what is on display e.g. photographs of family members etc. The Google Classroom application, when accessed via the Google Chrome browser, allows for an add-on through which you can have a customised or blurred background. If you are unsure how to achieve this, please read the guidance on ‘Working in a VLE’.

4. As in real meetings between young people and adults, it may be appropriate for another adult to be present in the room or at least aware that the meeting is happening.
   a. For students communicating with their project supervisor, this may mean you should arrange for an adult in your house to be close to where the call is happening if possible.
   b. For project supervisors making these calls to students, you should try to avoid being on a 1-2-1 call but, if unavoidable, please make a colleague aware of your call.

5. It will help if you make a communication calendar, agree what dates and at what times to contact one another and set out when you will not be available.

6. It is worth making a note of conversations immediately after the call has finished and to act on any issues, both positive ones (for example, you need to create a to-do-list or undertake some research to understand something more fully) or where you feel unhappy with something that happened on the call or immediately afterwards (for example, being sent unsolicited material).

We have drawn these few points from a range of sources set out at the end of this document and believe these principles should work well in any national context across England, Northern Ireland, Scotland and Wales. If you are in any doubt, please check with your Nuffield coordinator.

Likewise, when the project is underway, any problems regarding health and safety or safeguarding should be immediately flagged to the appropriate Nuffield Future Researchers regional coordinator.

**Guidance for project providers on GDPR status**

We do not provide personal data on the students to the organisations providing projects. Project supervisors will, therefore, need to collect any data they require from the students. They will be the data controllers for this; the Nuffield Foundation will be neither a controller nor a processor.

**Disclaimer**

The Nuffield Foundation and others involved in the organisation of Nuffield Future Researchers accept no responsibility for any actions, claims or demands that may be made against project supervisors by any students or their educational establishment or by any third party claiming against a project supervisor, in respect of any matter relating to the project. This guidance is advisory only.

Please contact nrp@nuffieldfoundation.org for any questions about this guidance.
Sources


