



Under 18s Working in School Policy

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1. Purpose and scope

This policy sets out the school's legal and safeguarding obligations when children and young people aged under 18 are involved in work, employment, work experience, volunteering, apprenticeships or similar activities in or organised by the school. It covers pupils on internal duties, external placements hosted by the school, and any young workers employed by the school. The school will comply with current UK legislation and statutory guidance.

2. Legal framework

This policy is informed by (non-exhaustive):

- Keeping Children Safe in Education (DfE)
- Children and Young Persons Act 1933 and local authority byelaws on child employment.
- Health & Safety Executive guidance for young workers / work experience.
- GOV.UK guidance on child employment (minimum ages, hour limits).
- National Minimum Wage legislation (age bands / apprentice rate) and Acas guidance.
- DBS and regulated activity guidance (when enhanced / barred list checks are needed).

3. Principles

1. **Safeguarding first** — the welfare and safety of under-18s takes priority. All placements/roles must be risk-assessed and supervised appropriately.
2. **Lawful working** — we will only permit activities that comply with minimum age rules, local byelaws, permitted working hours, rest breaks and pay rules.
3. **Proportionate checks & safer recruitment** — adults supervising or working in regulated activity must meet DBS and safer recruitment requirements.

4. Definitions

- **Child / young person** — anyone under the age of 18.
- **Work experience / placement** — a supervised placement organised by the school with an external employer or within the school for educational benefit.
- **Young worker** — a person aged 16–17 employed under a contract of employment. (Different legal protections apply from full adult employment.)

5. Who this policy covers

- Pupils undertaking internal duties (e.g. monitors, library helpers).
- Pupils on work experience placements arranged by the school.
- Young people employed by the school (e.g. breakfast-club assistants aged 16–17, apprentices).
- Volunteers under 18.
- External employers hosting pupils on placements.

6. Minimum age & prohibited activities

- **Under 13:** generally prohibited from employment; only limited exceptions allowed (e.g. certain performances with LA permissions). Local authority byelaws apply.
- **13–16 (compulsory school age):** may undertake limited, approved part-time work outside school hours subject to local byelaws and LA work permits (if required). Hours limits apply (see section 8).
- **16–17:** may be employed but special protections apply (working hours, risk assessment, health & safety, pay rates). Full-time work only when minimum school leaving age met.
- **Prohibited tasks:** any task that is hazardous under HSE regulations, or involves unsupervised care of younger children where the young person would be in regulated activity unsupervised, is not permitted. The school will consult HSE guidance for any borderline activity.

7. DBS / safeguarding checks and supervision

- Adults supervising under-18s in school normally will be subject to safer recruitment checks and, where applicable, enhanced DBS with barred-list check (regulated activity). Schools will follow KCSIE requirements on pre-employment checks. For work placements hosted externally, the school will assess whether supervisors require DBS checks and obtain confirmation of safeguarding arrangements from the placement provider.
- If an adult is allowed to start before a DBS certificate is received, the school will carry out a documented risk assessment and ensure enhanced supervision until checks are completed.

8. Working hours, rest breaks and time off

The school will not allow any pupil or young person to work in breach of statutory hour/break rules. Relevant summary (check local LA byelaws for further limits):

Compulsory school age (typically 13–15 / 16 depending on area) during term time:

- Max 12 hours per week (typical guidance — local byelaws may vary).

During school holidays:

- 14-year-olds: up to 25 hours/week (max 5 hours weekdays & Saturdays, 2 hours Sunday).
- 15-16-year-olds: up to 35 hours/week (max 8 hours weekdays & Saturdays, 2 hours Sunday).

Young workers (16–17):

- Max 8 hours per day, 40 hours per week. Must have 30-minute break if shift >4.5 hours, 12 hours rest between working days, and 48 hours off per week. Exceptions are narrow and temporary.

Note: the school will check local authority byelaws (some LAs require work permits) and will not place pupils where hours would breach statutory limits.

9. Pay, apprenticeships and PAYE

- If a young person is employed by the school they must be paid at least the National Minimum Wage appropriate to their age or the apprentice rate where applicable. From 1 April 2025 (example/current rate for reference) the under-18 rate was £7.55/hr and the 18–20 rate £10.00/hr — check GOV.UK each April for updates. The school's payroll must operate PAYE where required.

10. Health, safety and risk assessment

- All under-18 work placements / duties require a **written risk assessment** that considers additional vulnerabilities (less experience, ongoing development, medical conditions). The HSE guidance on young workers applies: employers (including the school when the young person is on placement in school) have primary responsibility for health & safety.
- Risk assessments must be recorded, reviewed, and signed off by the Headteacher or delegated Health & Safety lead.

11. Work experience placements

- The High School / College placing a student in to our School, will:
 1. Obtain parental/carer consent (written).
 2. Ensure the placement provider confirms appropriate insurance, health & safety arrangements and supervision.
 3. Confirm what activities the pupil will undertake and that these are safe, appropriate and lawful for their age.
 4. Make sure that we have all relevant risk assessments in place and a full induction takes place.

12. Internal pupil duties and volunteering in school

- Pupils may take on low-risk roles (library helper, monitor) with parental consent and staff supervision. The school will ensure these duties do not replace required teaching time or breach hour limits. For any pupil undertaking activities that amount to regulated activity (e.g. frequent unsupervised work with younger children), the school will treat the arrangement as work experience and apply the checks above.

13. Training and induction

- All under-18s will receive an induction covering: health & safety, reporting concerns, fire safety, first aid arrangements, safeguarding (how to raise concerns), and named supervisor details. The induction will be documented and retained on file.

14. Insurance and liability

- The school will confirm that the pupil/work experience placement is covered by appropriate employers' liability / public liability insurance. Where placements are external, the school will request confirmation of the placement provider's insurance and retain a copy.

15. Records and consent

Records to be retained for each under-18 working arrangement: parental consent, LA work permit where required, risk assessment, induction checklist, placement details, signed agreements with external providers, hours worked, payroll records (if employed), DBS evidence for supervising adults (where relevant). Records will be retained in line with the school's data retention schedule and GDPR.

16. Non-compliance, incidents and reporting

- Any breach of permitted hours, health & safety incidents, safeguarding concerns or suspected illegal employment will be reported to the Headteacher and, where appropriate, to the local authority (child employment team), HSE, or the police. The school will cooperate with any investigation and take internal disciplinary action when staff policy is breached.

17. Roles & responsibilities

- **Governing Body (Trust Board):** approve policy and ensure compliance.
- **Headteacher:** operational responsibility, final sign-off for placements and risk assessments.
- **Designated Safeguarding Lead (DSL):** ensure safeguarding arrangements for under-18s and oversee DBS/supervision questions.
- **Business Manager / HR:** ensure payroll, contractual and NMW compliance.
- **Placement organiser / supervising teacher:** day-to-day oversight of the young person, induction, and record keeping.

18. Equality and inclusion

The school will ensure reasonable adjustments are made for young people with disabilities or additional needs, ensuring equal access to appropriate work experience and paid work, and ensuring risk assessments explicitly consider these needs.

19. Monitoring and review

This policy will be reviewed annually and whenever statutory guidance or legislation changes. The school will maintain a log of under-18 placements and internal duties and will report annually to governors on compliance and any incidents.