

## Child Safeguarding Policy and Child Protection Guidance

<b>Version</b>	1.1 This version acknowledges role of University Compliance Officer and the Report and Support Team.
<b>Owner (Directorates)</b>	University Compliance Officer, with: <ul style="list-style-type: none"> <li>• Student Experience</li> <li>• The Equality and Diversity Office</li> <li>• Human Resources</li> <li>• Safety, Health &amp; Wellbeing</li> </ul>
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<b>Approval</b>	<p>This Policy was approved by University Court on 1 March 2022, Combined Joint Negotiation and Consultative Committee on 23 February 2022, Staff Committee on 3 February 2022, Senate on 26 January 2022, and prior to that Education Strategy Committee on 22 December 2021 and the Equality, Diversity and Inclusion Committee on 10 November 2021.</p> <p>It delivers the principals and procedures communicated in the Safe360™ Safeguarding Framework Proposal that was endorsed by Executive Team in March 2019.</p>
<b>Publication Date</b>	March 2022
<b>Review Date</b>	<p>This policy will be reviewed within the first year of publication and annually thereafter or following any safeguarding incident of actual or suspected abuse perpetrated between our staff, volunteers and beneficiaries. A group will be established to take forward the annual review process.</p> <p>Procedures and Guidance are reviewed on an ongoing basis and revised as updates or developments are needed.</p> <p>Following revision of the Policy, highlights of changes will be communicated in newsletters.</p>
<b>Communication of Policy</b>	<ul style="list-style-type: none"> <li>• Policy and guidance are published on University Safe360™ web pages and Corporate Comms outputs</li> <li>• Linked through Strath App</li> <li>• Promoted through campaigns and partnership activity with Strath Union external partners</li> <li>• Updates will be shared in Newsletters</li> <li>• Tailored briefings</li> <li>• Operational Guidance</li> </ul>

## Contents

### Policy Statement

Section 1: Our commitment to children and young people

Section 2: Child protection, roles and responsibilities

Section 3: Risk assessment helps us safeguard

Section 4: Reporting procedure

Appendix A: Legal context

Appendix B: General signs of harm or abuse

Appendix C: Definitions and terms used

Appendix D: Strathclyde's Children and Young People's Charter



## Child Safeguarding Policy and Child Protection Guidance

### Policy Statement

If you work or volunteer for the University of Strathclyde, or you undertake any duty acting on the University's behalf, then this guidance and procedures are important to you.

As a representative of the University, you have a significant position of responsibility and an essential role to support the wellbeing and safety of children and young people who participate in activity organised by the University of Strathclyde. We refer to this as 'safeguarding'.

This policy and guidance outline our collective commitment to the care and protection of all children and young people who use, or are beneficiaries of our services, participate in activities organised by the university or are involved in research, outreach or development programmes across our physical, digital and global campus.

Our commitment to equality, diversity and fair treatment for all underpins this guidance. All children regardless of age, gender, disability, ethnic origin, care or socio-economic status have a right to be protected from all forms of harm, abuse, neglect and exploitation.

We refer to a child as any person who has not yet reached their 18<sup>th</sup> birthday. This is in accordance with the United Convention on the Rights of the Child (UNCRC) and the [Children and Young People \(Scotland\) Act 2014](#). Although the term 'young person' may be used to describe a child aged 16-17, if they are under the age of 18, they are defined as a child, and they have a right to participate in a safe and stimulating environment.

[See Appendix A: Legal Context](#)

Adhering to this guidance keeps us all safe. It sets out our safeguarding principles, the procedure to follow if you have a concern, and signposts where to go for advice when you need it.

#### **This Policy and supporting guidance support you to:**

- be vigilant to signs of harm or abuse;
- know what to do if you are concerned for the wellbeing of a child;
- be fully aware of practices you should never undertake when working with children; and
- know what to do in the event of an emergency.

### **This information is essential to you because:**

- There may be a time when a child or young person discloses abuse, harm or threat to any member of the University community, at any time. It could be you.
- A child or young person may approach you to discuss issues or circumstances in their life that impact upon their wellbeing. They may see you as a person they hope can help, or who can signpost them to a service within the university.
- You, or any member of the University community, may have a concern about the wellbeing of a child, young person, or a pregnant woman at risk of harm.
- You may observe misconduct by a person in a position of trust, or harmful actions of a child or young person against another that you must report.

### **The procedures relating to this Policy ensure that:**

- Anyone can report a child protection or safeguarding concern. All concerns or allegations will be taken seriously and responded to quickly and sensitively.
- Children and young people will be listened to, and treated with dignity and respect.
- We actively promote safe practice and challenge poor or unsafe practice across all University activity
- All concerns and incidents are reported, properly recorded and managed
- Specific Data Protection rules that apply to children are upheld
- All representatives are made aware of their duty to comply with the policy, hold themselves to account and play an active role ensuring a safe environment for all.

## Related policies and procedures

This Policy outlines the high standards for staff and students to uphold the rights of others as outlined in the following related Policies and Procedures. They should be read alongside this Policy.

- [Strathclyde Community Commitment](#)
- [Safe360<sup>o</sup>™ Safeguarding Policy](#)
- [GBV Policy: Staff and Students](#)
- [Complaints Procedure](#)
- [Safety, Health and Wellbeing Risk Management](#)
- [Protecting Vulnerable Groups Policy](#)
- [Applying with a criminal conviction](#)
- [Student Criminal Conviction Procedure](#)
- [Staff Disciplinary Procedure](#)
- [Student Discipline Procedure](#)
- [Let's Disclose It! Pledge](#)
- [LGBT+ Guidance](#)
- [Dignity and Respect Policy](#)
- [Equality, Diversity and Inclusion Policy](#)
- [University of Strathclyde Corporate Parent Plan](#)
- [Policy on Children Accessing University of Strathclyde IT Systems](#)
- [Student Guidance on the Use of Social Media and Virtual Learning Environments](#)
- [Guidance on Use of Social Media](#)
- [Staff Personal Relationships Policy](#)
- [Grievance Procedure \(Staff\)](#)

# Section 1: Our commitment to children & young people

## 1.1 Policy Scope

### **The University of Strathclyde works with children and young people:**

- Undergraduate students can be under the age of 18
- Widening access and recruitment activities take place on or off campus
- The University offers open events, services, courses, facilities, summer schools, excursions, volunteering, mentoring, placements and internships which may bring our students and staff into contact with children and young people regularly, on and off campus
- Children may be involved in research or professional practice, such as that undertaken in social care, health or education settings
- Children may be beneficiaries of international or cross-border programmes
- Our operations may facilitate contact with children, or have an impact on children e.g. sports, recreation, clubs and societies
- Young people under the age of 18 may be employed by the University
- Students and University staff may be pregnant or parents/carers of children
- University IT systems and services may be used, or accessed by children

## 1.2 Safeguarding children is everyone's responsibility

Everyone is required to play their part to promote, support and safeguard children and young people's wellbeing, to ensure they are safe to thrive and supported to reach their potential when participating in University programmes across the physical, digital or global campus.

This guidance applies to all members of the University Community including:

- University Court and Senate Members, Trustees, Executive Team Representatives
- All members of staff including those with full-time, part-time and sessional contracts, honorary staff, and staff from other institutions or organisations on placement, or working on a visiting basis at the University
- All students, including exchange and placement students
- University students and staff on, and off campus (including work-based and placement learning, clinical, educational, legal settings etc.) regardless of their mode of study and irrespective of whether a matter arises during term time or academic holiday periods.
- Visitors, including adults and children using the University's premises
- Individuals working or acting on the University's behalf including suppliers of goods and services, and those who represent the University regardless of the nature or term of their contract or secondment, or location.
- Contractors and volunteers working at, or on behalf of the University.

## **Any member of the University Community can report a safeguarding concern.**

This policy advises on what to do if you need to report a child safeguarding concern or incident. A child or young person may approach a person or service within the university, to discuss issues or circumstances in their life that impact upon their wellbeing, or you may:

- receive a disclosure of harm
- have a concern about a child, young person, or an unborn child in the case of a pregnant person.
- receive or make an allegation of abuse
- have a concern that a person is at risk, see or suspect abuse (no disclosure)

We use the term **Reporter** to describe a person who reports an incident, a disclosure or a concern.

We use the term **Reported** to describe a person who is accused of causing harm or is considered a cause for concern. Where a person at risk discloses or discusses potential abuse or harm, the staff member or volunteer should be able to:

- Recognise signs of harm or abuse
- Respond sensitively
- Record Factually
- Report using [Report and Support](#)

The University's Report and Support Response Team (RSRT) Team will respond to all concerns quickly and sensitively.

Where there are concerns about harm, abuse or neglect, it is not your responsibility to decide whether abuse has occurred, or to investigate or to judge, it is simply to report any concerns.

**Whether a 'persistent doubt' or something may not 'feel right'. Speak up.** To understand how to recognise, respond and report a child safeguarding matter,

[See Section 4: Reporting Procedure.](#)

## **1.3 Our Child Safeguarding Principles**

All University representatives are required to conduct themselves in a manner consistent with the following Principles. Any concerns will be treated seriously, and if necessary disciplinary or legal action taken. Failure to report any suspicion of abuse relating to someone else is a breach of this Guidance and could lead to Staff or Student disciplinary action being taken.

- The welfare and wellbeing of every child or young person is paramount.
- We work together to ensure robust steps are taken to protect children from abuse.
- We value, listen to and respect all children and young people with equal protection regardless of protected characteristic.
- We promote a culture where anyone who is bound by this policy is supported to raise issues about safeguarding, in confidence.
- Our role / employment within the University community places us in a position of trust, and we all undertake to uphold trust at all times.

- We have developed a clear process for dealing with allegations against people who work with children through which all suspicions and allegations of abuse will be taken seriously and appropriate action taken.
- All managers, employees, volunteers and other representatives have access to, and are trained so that they are familiar with this policy, accountable, and know their responsibilities within it.
- Our robust recruitment practices ensure that we will not recruit staff, volunteers or other representatives if they pose a known risk to children’s safety or wellbeing, and we uphold our duty to report.
- Safeguarding and child protection are a distinct element within the induction process and all staff receive training on safeguarding children at a level commensurate with their role.

## 1.4 How to identify if a child or young person is at risk

**Wellbeing:** We refer to the ‘[Getting it Right for Every Child](#)’ (GIRFEC) eight GIRFEC Wellbeing Indicators (**Table 1**) to ensure a common understanding of what wellbeing means, and to identify what help a child or young person needs in order to help them access support.

Table 1: GIRFEC Wellbeing Indicators	
<b>Safe</b>	Protected from abuse, neglect or harm
<b>Healthy</b>	Supported to make healthy, safe choices contributing to both physical and mental health
<b>Achieving</b>	Receive support and guidance while learning – boosting skills, confidence and self-esteem.
<b>Nurtured</b>	A safe, nurturing and stimulating place to develop and live.
<b>Active</b>	Opportunities to take part in a wide range of activities towards a fulfilling future.
<b>Respected</b>	Opportunity to be heard and involved in decisions that affect them.
<b>Responsible</b>	Opportunities and encouragement to take an active role within their learning and university communities, and having appropriate guidance and supervision.
<b>Included</b>	Supported to overcome social, educational, physical and economic inequalities, and accepted as full members of the communities in which they live and learn.

### An individual may share a concern or worry with you

A child or young person may disclose to you that they are experiencing harm or abuse, or a third party may tell you that a child is being abused. A disclosure may also relate to abuse that happened in the past (historical abuse). However, children and young people who suffer abuse may be afraid to tell anybody. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member, friend or other children or young people. Some disabled or young children with dependency upon an abuser may feel more vulnerable.

General signs may be an indication that a child or young person is at risk, and you should report concerns using [Report and Support](#).

It is **not** your job to judge or investigate if abuse is occurring. Simply ensure the immediate safety of the child or young person and report any concerns.

[See Appendix B: General Signs of Abuse and Neglect](#)

[See Section 4: Reporting Procedure](#)

## 1.5 Children's Rights are at the heart of our decision and policy making

We recognise the innate vulnerability and inexperience of children and young people under 18 years, who may be entering University. At the very start of a project or programme and at every stage of development, the impact on children should be considered. As such, we ensure children and young people are identified by age which helps us to provide targeted messaging and support. We should also aim to involve representative children and young people. We must ensure that the UNCRC guiding principles are embedded within our policy and practice and take the following steps to ensure that children and young people experience their [rights](#):

- We review our suite of Safe360° policies and procedures, supporting guidance and practice on a needs basis and in line with national guidance. We refer to [NSPCC Learning, the Upstream Project](#) and the [CELGIS Knowledge Bank](#) produced by the Centre for Excellence for Children's Care and Protection (CELGIS) and based at the University of Strathclyde.
- **Equality Impact Assessments (EIA)** should ensure that the special needs and vulnerabilities of children, particularly by age and disability, are considered in planning and ongoing review to support continual improvement.
- **University Committees** making and overseeing decisions are advised to consider the impact on children, necessary protections for children and protected characteristic groups. Relevant information should be highlighted within the Equality and Diversity section of the cover sheet for Committee Papers and where necessary, instructs a Child Rights and Wellbeing Impact Assessments (CRWIA) are conducted where necessary and inform our decisions. These must be published separately from Equality Impact Assessments.

## 1.6 Designing Safeguarding into the practical design and delivery of activity

- **Risk Assessment** identifies preventable health, safety, and safeguarding risks, across both physical and digital environments. We take a proportionate response to mitigating risks identified. Where actions to ensure safety for an individual are not proportionate to the activity, or attainable, we may decline to provide a service.

[See Section 2: Risk Assessment helps us safeguard](#)

- **Partnership agreements** with third parties should have safeguarding as a visible and demonstrable core component. They must be underpinned by Risk Assessment and robust procedures.



- **At induction or point of introduction to University activity**, we promote the UNCRC to children and young people and ensure that they are aware of their rights and how to report a safeguarding issue.

See [Appendix D: Strathclyde's Children and Young People's Charter](#)

- **Communication by the University** promotes safeguarding expectations and [Report and Support](#). Clear reporting procedures and guidance are widely shared when working with Children and Young People Under 18.
- **Research involving children** must be in line with University Procedures for Safeguarding Children. Guidance is produced for operational teams.
- **Training** includes information about University and statutory policy positions, reporting and investigation procedures and how to embed Child Safeguarding in the University's work. All University staff and representatives are expected to undertake training on Child Safeguarding and Child Protection commensurate with their role. Volunteers, mentors, and ambassadors require training to ensure that their capabilities and competencies are at a level where they can operate without putting themselves and others at risk.

## 1.7 Digital Safety

We want children who use our services to feel safe and valued and so we must understand the risks and issues associated with children and young people being online and apply this to our context. We recognise that children can be at risk of harm when they use technology. This could include:

- Inappropriate or harmful online content incl. disturbing or upsetting videos, adverts and pop-ups
- Talking to strangers, or having strangers view content
- Lack of privacy (perceived or actual)
- Sexual offending against children online
- Bullying online
- Risk of sharing personal information, images, and sexting
- Online radicalisation and extremism

This requires the University to scrutinise specific safeguarding considerations for children and young people across communications, digital systems, and behaviours.

Social media and technology evolve rapidly and this guidance has been developed to educate students in the safe and constructive use of digital technologies, and model best practice to ensure our University is operating in line with our values and the within the law of how we behave online.

Online networking has transformed communicate with others, enabling us to communicate one to one or on a platform amongst large groups of people, increasingly from personal devices. Social media apps, networking sites, chatrooms, blogging, vlogging, instant messaging and video calls allow us to communicate remotely with many people many of whom we do not know or even see and sharing personal information.

Children and young people may expose themselves to danger, intentionally or unknowingly when using the internet, social media, and other technologies.

Non-contact abuse can take place online, for example, grooming for the purpose of sexual abuse. Some young people may find themselves involved in inappropriate or illegal activities.

This can include cyber-bullying or 'sexting.' Young people who send naked or inappropriate photos of themselves or others are sending child images, which is a criminal offence. Taking or sharing images of themselves or others can lead to disturbing consequences which may have a long-lasting impact, including blackmail, bullying, unwanted or public attention and emotional distress. This has serious implications if considered to constitute the sexual exploitation of children under the age of 18 through prostitution or pornography, as set out in the [Protection of Children and Prevention of Sexual Offences \(Scotland\) Act 2005](#).

Any kind of abuse can have impact on a victim, for example, it may lead to victimisation and online hate content, which is also potentially illegal. Extremists use social media effectively to target and influence vulnerable individuals and spread ideologies that can lead to radicalisation.

This list is not exhaustive.

We produce guidance for staff to support the safe use of digital platforms and video calls.

## 1.8 Children and the UK General Data Protection Regulation

We comply with the UK General Data Protection Regulation and follow the guidance for [Children and the UK GDPR](#)

### **Children and young people have specific digital rights**

We recognise and uphold the 5Rights of young people in the digital world

1. The right to remove
2. The right to know
3. The right to safety and support
4. The right to informed and conscious choices
5. The right to digital literacy

Young Scot produce information on the 5Rights campaign, available [here](#).

### **Consent for information sharing**

In Scotland, children aged 12 or over are presumed to be of sufficient age and maturity to exercise their rights in relation to their personal data, and to give consent for data protection purposes, unless the contrary is shown.

If a child is not competent to exercise their own data protection rights or consent to processing themselves then it will usually be in their best interests to allow an individual with parental responsibility to act on their behalf. Where a parent /carer acts on behalf of a child, note that the rights still belong to the child and not to the parent / carer.

Parent / carers may exercise rights on behalf of their child if:

- The child is under the age of 12

- The child is over the age of 12, but there are reasons why the child does not have sufficient understanding to exercise the rights for themselves
- The child is over the age of 12 and has authorised the parent / carer to act on their behalf.

The University [Policy on Children Accessing University of Strathclyde IT Systems](#) sets out the necessity of supervision of children accessing online platforms. This is because the IT systems and general access permissions are for staff and students relate to work, study and research content, some aspects of this may be inappropriate for children under the age of 18 who are not registered to a course of study.

## Section 2: Child Protection, Roles and Responsibilities

### 2.1 Child Protection Procedure

By law, all agencies, professional and public bodies, and services that deliver adult and/or child services and work with children and their families have a responsibility to recognise and actively consider potential risks to a child, irrespective of whether the child is the focus of their involvement. They are expected to identify and consider the child's needs, share information and concerns with other agencies and work collaboratively with other services (as well as the child and their family) to improve outcomes for the child.

Child protection means protecting a child or young person from child abuse or neglect. We all need to be curious about the wellbeing of children and young people. All professionals and members of the wider university communities have a role to safeguard children and young people. It is everyone's responsibility to make sure all our children and young people are safe and protected from harm and to act if we are worried or notice something that causes concern.

Child Protection procedures are what we follow for children who have been harmed or who we suspect are at risk of abuse, harm, or neglect. Abuse or harm need not have taken place for the Report and Support Response Team to escalate a concern.

Abuse or neglect need not have taken place for action to be taken to protect a child or young person; action can be taken when there is a likelihood or risk of significant harm from abuse or neglect, whether physical, emotional, or sexual.

All forms of child abuse and neglect have an adverse impact on a child or young person's health and wellbeing. The impact can be immediate, or it can build up over time, leaving children and young people with vulnerabilities and challenges throughout their lives.

It is, therefore, important to try and prevent child abuse and neglect from happening at all. Where it does occur, it is best to identify it early and respond quickly to help the child or young person. This will minimise harm both immediately and in the longer term.

The university views all children under 18 as vulnerable, some more so than others. The specific response will depend upon what is known about their vulnerabilities or trauma.

Report any concern relating to a child or unborn child using [Report and Support](#). Our relationship with the Local Authority and Social Work Services is fundamental. When there is a concern that a child or young person might be at risk of significant harm from abuse or neglect, the Report and Support Response Team always share a concern with Social Work Services or Police.

[See Section 4: Safeguarding Reporting Procedure](#)

## 2.2 Responsibilities

- **The University Compliance Officer** is the Lead for the overall Safe360°Safeguarding Framework and is responsible for the application of the procedures associated with this Policy.
- Approval of this Policy and procedures is authorised by the Equality, Diversity and Inclusion Committee, followed by Staff Committee and Court (Staff) or Education Strategy Committee and Senate (Students). A consolidated and anonymised dashboard of safe-related incidents and concerns is regularly produced for Executive Team by Security, Safety, Health and Wellbeing and Student Experience. It is shared with key committees in order that a responsive structure of support is supervised and continually discussed at senior level.
- **The Director of Student Experience** is responsible for the day-to-day management of the Safeguarding Policy and implementation of related procedures and support for matters relating to students.
- **The Director of Human Resources** is responsible for supporting staff with safeguarding concerns, the procedures relating to disclosures, allegations or reports involving staff, including support sought by staff.
- **The First Responder Network** of key contacts are promoted widely for disclosures, reporting, support, or guidance relating to a safeguarding incident for any member of the University community.
- **The University of Strathclyde expects partner organisations of the University to have their own safeguarding policies and child protection reporting procedures in place.** Strathclyde University representatives should never be complacent. University staff must always demonstrate leadership in checking for and applying risk assessment to interrogate safeguarding processes.

## 2.3 Expectations for all University staff, Students, Volunteers and Representatives

Everyone within the scope of this policy, outlined in Section 1, acting on behalf of the University of Strathclyde in any capacity, on campus, off campus, or across digital platforms, in the UK, or other countries should be aware of, and uphold this policy. They are expected to:

- Contribute to a safe and respectful learning and working environment.
- Undertake all provided training associated with this policy commensurate to your role.
- Respond promptly to all safeguarding concerns or incidents. Never be a bystander, fail to act upon, or address a safeguarding concern.
- Report any concerns, suspicions, or information regarding safeguarding violations through the university's safeguarding reporting system, [Report and Support](#). Maintain respectful confidentiality about any suspected, or actual incidents, and uphold the ongoing protection of sensitive information of parties involved or referred to.

- Be diligent to the University [PVG guidance](#). If in doubt, contact HR or your Line Manager to clarify the appropriate level of Disclosure or PVG check that a role you undertake may require. Advise HR or your Line Manager of any violation to Disclosure or PVG regulations in relation to your own record, or others, that impacts on work with children and adults at risk.
- Co-operate fully with internal or external investigation into reported concerns.
- The university expects that its staff will ensure that any student having trouble will be signposted to appropriate support services in order that the individual can be supported appropriately.
- Treat safeguarding seriously. We need to uphold safeguarding standards to create safe environments for one another, noting that some remits, for example, undertaking research can often expose individuals and teams to challenging opinions and behaviours such as harassment or hate-related threats. These may compromise their safety and can constitute a crime.

## Section 3: Risk assessment helps us safeguard

Safeguarding should be intentionally 'designed into' the planning stage through active risk assessment that considers the needs and vulnerabilities of those this policy represents.

Risk assessment is an intrinsic part of the safeguarding process. It is used to assess and manage potential risk of abuse or neglect that might harm a person's wellbeing, in a similar way to how we consider health and safety, so that the specific needs of children and vulnerable groups are considered in University activity. The following are incorporated within the wider [Risk Management Framework](#), and its supporting toolkit, located on [Risk and Resilience SharePoint site](#).

Preventative Safeguarding considerations and mitigations for the risks identified are incorporated within the wider risk assessment, grants and contracts processes:

- ✓ Everyone is clear about their responsibilities in relation to safeguarding within each unique operational context; has access to, and complies with this policy and procedures.
- ✓ We identify a single point of contact who supports the risk assessment process from start to finish, and who liaises with a counterpart at the partner organisation to ensure that safeguarding measures appropriate to the activity are in place.
- ✓ We request to see the partner organisation's safeguarding policy and procedures.
- ✓ Identify and manage risk associated with public interaction to ensure vulnerable groups are safe.
- ✓ Clarify whether under 18s or vulnerable groups will be attending events and ensure that specific considerations are outlined in the risk assessment.
- ✓ We incorporate specific guidance relating to gender-based violence within the Equality Impact Assessment and Risk Assessment processes
- ✓ We know who to contact in the University for advice.
- ✓ Safer recruitment requirements are articulated so that all staff and volunteers have appropriate training and appropriate checks before activity commences.
- ✓ At the point of induction, a safe and respectful behaviour code is promoted, and all participants understand the ground rules for engagement.
- ✓ [Report and Support](#), the public reporting tool, is promoted and the process through which to report a concern is communicated from the outset and made continually accessible.
- ✓ Equality Impact Assessment and Risk Assessment explores any barriers to a person's ability to raise concerns, receive early help or rapid response.
- ✓ Digital safeguarding: Online activity is risk-assessed in addition to physical risks.

- ✓ Appropriate supervision is assessed and ensured for both physical and digital activity.
- ✓ Registers of activity that takes place off campus, may also be held centrally.
- ✓ We promote **Strathclyde's Children and Young People's Charter** at point of induction to activity so that under 18s are aware of their rights and know how to report.

We use risk assessment to make informed decisions. The University reserves the right to refuse to recruit an employee or to admit a child, adult at-risk or protected adult to a programme or course of study, or other university managed activities, if it judges that any risk-based adaptations necessary to safeguard that individual's wellbeing go beyond what is possible, reasonable or proportionate.

A suite of guidance supplements this policy to provide detailed information to support operational teams in their application of safeguarding practices and when undertaking their everyday roles. This enables a thorough grounding and context for how we design safeguarding into every aspect of University activity.



## Section 4: Reporting Procedure

### 4.1 How to Report a safeguarding concern

This section gives guidance on what to do if you have a concern a person is at risk. It may be:

- a disclosure of harm
- an allegation of abuse
- you have a concern that a person is at risk, see or suspect abuse (no disclosure)

We use the term **Reporter** to describe a person who reports an incident, a disclosure or a concern.

We use the term **Reported** to describe a person who is accused of causing harm or is considered a cause for concern. Where a person at risk discloses or discusses potential abuse or harm, the staff member or volunteer should be able to:

- ➔ **Call 999, if there is an emergency and a person is in immediate harm**
- ➔ **Contact University Security**
- ➔ **Report using the [Report and Support](#) online reporting form**

If you are not able to complete the Report and Support online form at the time, record the disclosure, observed incident or concern clearly and factually as soon as possible and upload to the Report and Support system as soon as possible, and within 24 hours.

#### **How to respond sensitively**

If you are the trusted person to whom a Reporter discloses, make yourself available. Never stop the reporter speaking freely or cause them to wait because this may be the only time they are ready, or able to disclose. This guide may assist: [Helping Students in Distress: A guide for Staff](#).

#### **If not in immediate danger, is there a threat for the person?**

- Do they feel safe right now? Ensure the immediate safety of the person(s).
- What do they need from you at this moment?
- Do they require immediate medical assistance?
- What form of harm are they experiencing / have they experienced?
- When did the incident take place?
- Is there a threat or danger for the person? It may be immediate or anticipated later, perhaps when they return home, or on the route home?
- Are vulnerable adults or children involved (includes pregnancy to 18 years old)

**In relation to children, consider the Wellbeing Indicators (safe, healthy, achieving, nurtured, active, respected, responsible, and included) consider:**

- What is getting in the way of this child or young person's wellbeing?
- Do I have all the information I need to help this child or young person?

- What can I do to help this child or young person?
- What can the University / expert agency do to help this child or young person?
- What additional help may be required from others?

**Stay calm, listen, and show that you understand and believe the Reporter.**

- Do not react strongly, show shock or disapproval
- Do not ask leading questions. You may wish to repeat back what you have heard.
- Do not make promises you cannot keep
- Do not judge or investigate
- Do not jump to conclusions, criticise, confront or contact the alleged perpetrator
- Be aware that your own feelings may differ from the reporter

**Clarify with the Reporter that information shared with you will be treated with discretion, but you cannot promise absolute confidentiality.** You cannot be bound to secrecy. Details giving rise to concerns or suspicions of abuse will only be shared with the Report and Support Response Team in order to make decisions about next steps and identify the right support for the individual.

[See Section 4.4: Confidentiality and Information Sharing.](#)

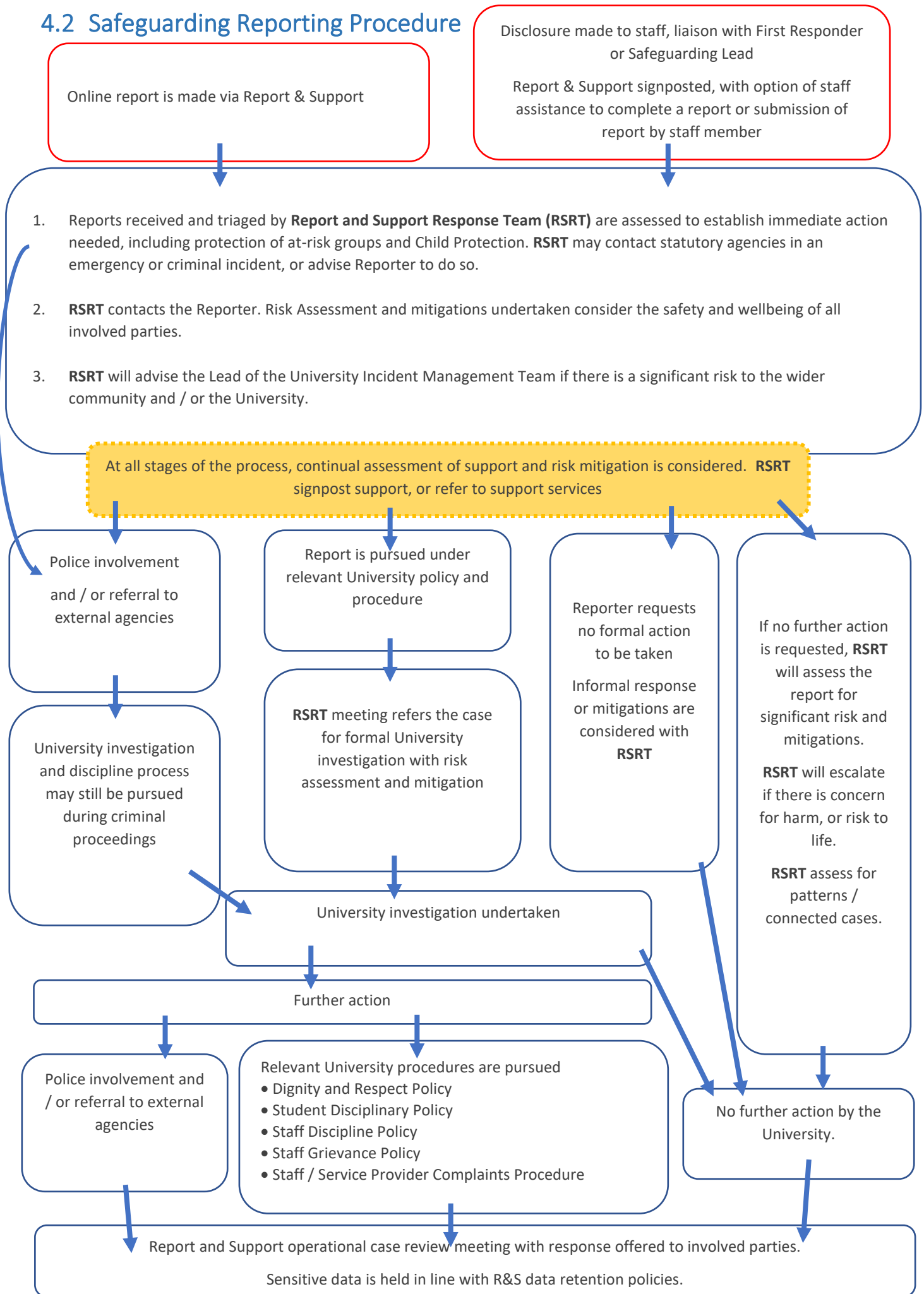
**There may be reluctance to disclose because the Reporter:**

- May be unsure that what they are experiencing is abuse
- May be fearful that they will not be believed
- Be bound to secrecy by the abuser
- Dependent on the abuser (e.g. financial, emotional or housing)
- Worried about what will happen next
- Feel guilt, loyalty, pain, embarrassment, shame, compliance
- Perceive that others are too busy or do not see them as important
- Be anxious in case anyone else finds out
- Peer on peer abuse may be a factor. A child or young person may have harmed by another child or is at risk. They may have committed an offence against or be involved in an offence against a child or young person. Equally a student/staff member may have harmed another student/staff member or is at risk of doing so or has committed an offence against or related to a student/staff member.

**Maintain discretion:** Never disclose or discuss any safeguarding incident or case that you are involved in, except with the Lead assigned by the Report and Support Response Team. It is not our job to investigate or to judge, and staff must uphold the privacy rights and respect for all parties involved. Never gossip or share.

**Take care of yourself:** If you are supporting, or have witnessed a safeguarding incident. Or if you are responding to a safeguarding concern, including supporting a person who chooses to disclose to a safeguarding issue, these can raise difficult, traumatic or triggering feelings for you. The University can provide supervision for staff through Human Resources or support for students through Student Experience should wish you to discuss your feelings and response at a later stage. Confidentiality applies as per [Section 4.4 Confidentiality and Information Sharing](#).

## 4.2 Safeguarding Reporting Procedure



## What happens after an incident is reported?

When an incident is reported through [Report and Support](#), the Report and Support Response Team, the operational group looking at all reported 'Report and Support' incidents, makes a judgement as to whether a reported incident(s) hit a trigger. For example, that may be the case in instances of serious assault where there are several incidents within a short time window or same place on campus, and may be escalated to the University Incident Response Team.

## Hitting the trigger

- ✓ If there is something that hits a trigger, the Director of Student Experience and Director of HR are alerted, alongside USCO as the lead of the Incident Management Team, and the Risk and Resilience Team.
- ✓ At this stage, an Incident Response Team (the level below Incident Management Team) would be convened to assess the situation, impact on University business, reputation, wider support of the student and staff community, and to liaise with person/their family, outside agencies, communications etc.
- ✓ The membership of the Incident Response Team is diverse and tailored to respond to the anticipated types of incidents.

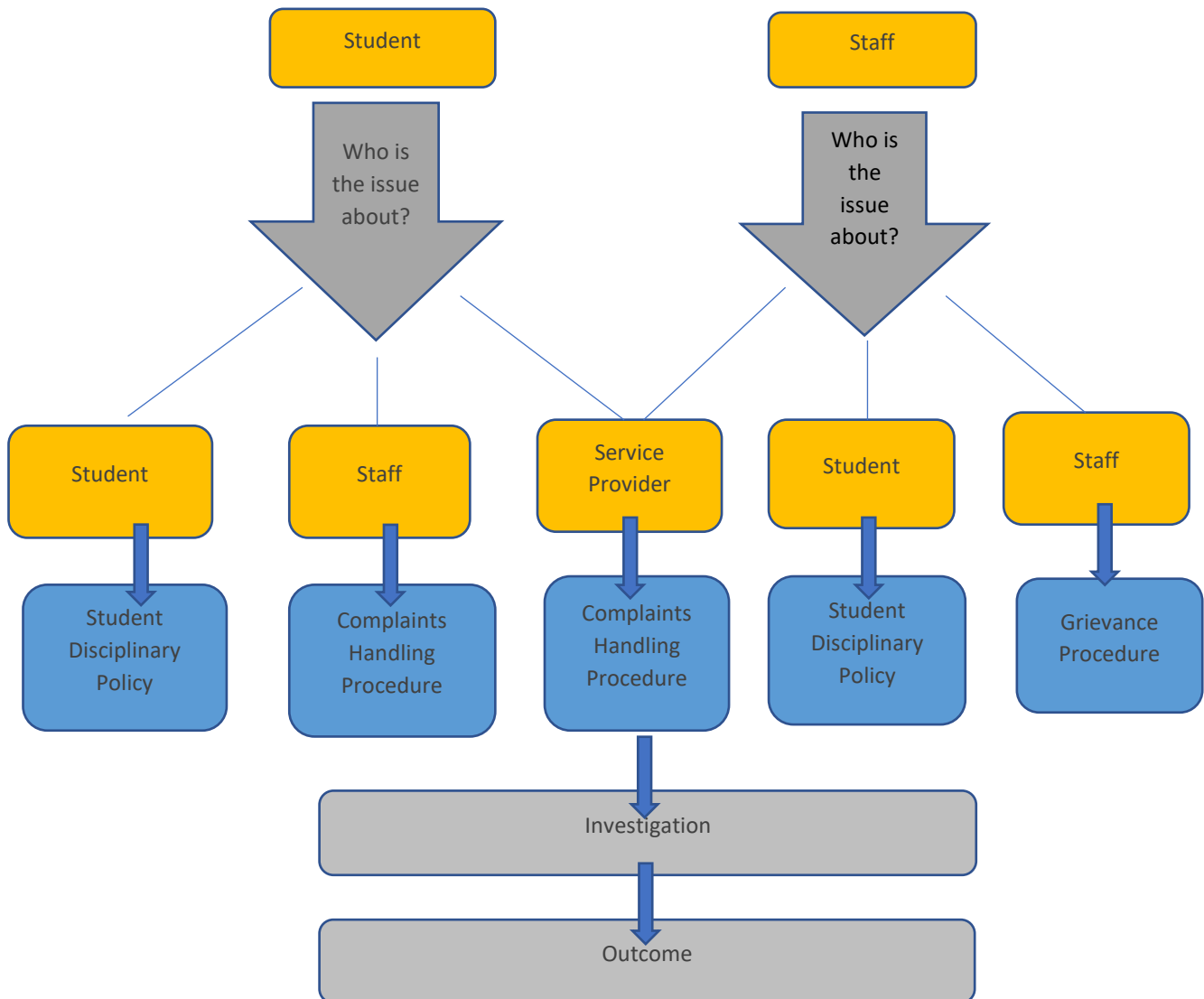
This is set out in the Incident Response Plan Flowchart and may be further escalated to the Incident Management Team, as necessary. The University's [Emergency Response and Business Continuity Management Policy](#) is supported by specific strategic plans for known emergency situations.

Emergency information is located on the university Safety, Health and Wellbeing pages [here](#).

All staff and students should be familiar with the [Security Guidance for Staff and Students](#) which is provided to raise awareness of predictable security threats and information about how to minimise the associated risks whilst at the University.

## 4.3 Relevant University Procedures Pursued

The following diagram shows the procedure that will apply depending on whether the Reporter or Reported party is a student, a member of University Staff or a Service Provider. Police will be called in any incident involving members of the public.



The University will use discretion to identify the most appropriate route for dealing with the concern, based on the circumstances of the situation, or if there are overlapping procedures in relation to a similar matter. For example, if a student and staff member are the subject of the same complaint, it may be appropriate to deal with the matter under a number of procedures, or to deal with the matter under one single procedure, or a hybrid of procedures.

Where a service provider or third party raises a complaint against a staff member or a student, a fact find may take place to establish whether the matter should proceed under the student disciplinary procedure or the staff disciplinary procedure or any other procedure/policy as appropriate.

Persons raising complaints should be aware that the details of any staff or student disciplinary procedures are confidential. It may therefore not be possible to fully advise on the outcome of any investigation to the complaint.

## 4.4 Confidentiality and information sharing

Disclosures of Safeguarding concerns or personal information provided to Report and Support are shared with the Report and Support Response Team. This is a very limited group of university staff who assess how best the University can respond to, and take any necessary actions, to investigate incidents and/or provide appropriate support, including the role of external agencies in line with adult and child protection legislation.

Information reported is securely stored and accessible only to the Report and Support Response Team who will assess and support next steps. On a case-by-case basis, a member of staff will usually contact the Reporter/Reported to discuss what can be done. Consent will be sought before sharing information, making referrals, or contacting anyone on a Reporter/Reported person's behalf. However, where there is risk of significant harm, risk to life or if there are serious safety and wellbeing concerns, or concerns about the professional conduct of a member of staff raised by a report, we may need to take urgent action without asking for consent first. This may include contacting emergency contacts or external agencies for assistance. We will not treat a report as a complaint until we have contacted the Reporter to discuss the information submitted.

We will not share a student's report with their department without their agreement, unless there are serious safety concerns.

The Privacy Notice for Report and Support can be accessed [here](#) and via the [Report and Support page](#)

When we process personal data about identifiable individuals we must do so in compliance with [data protection legislation](#). Under the legislation individuals have a [number of rights](#) regarding their personal data.

## 4.5 Record Keeping

Report and Support records or supporting information relating to a report, which may include sensitive information about individuals, are kept electronically and stored safely within the Report & Support system for 6 years.

The Report and Support Response Team review safeguarding incident reports submitted to the Accident, Incident and Reporting System (including Report and Support), looking at the number and pattern of reports, their source, and the outcomes from each.

Anonymised data collected from safeguarding reports is collated to enable a consolidated Board 'Dashboard' Report presenting real-time graphical data outputs from Student Experience, Security and Safety reports. This is a key way in which we monitor activity, look for patterns to learn from case management evaluation and improve our approach to safeguarding. This allows for evaluation and provides data for Executive Team to support decision making, and resource allocation.

## Appendix A: Legal Context

The [UN Convention on the Rights of the Child \(1989\)](#) (UNCRC) requires Member States to protect all children from abuse, and the Scottish Government have set a clear vision and ambition to help children and young people experience their human rights by committing to incorporate the articles of the UNCRC fully and directly into Scots law<sup>1</sup> and embed children's rights in all aspects of society.

The key reference for this document is the [National Guidance for Child Protection in Scotland, Scottish Government, 2021](#). In line with [The Children and Young People \(Scotland\) Act 2014](#), this policy is underpinned by '[Getting it Right for Every Child](#)' (GIRFEC) Scotland's national approach that puts the rights and wellbeing of children and young people at the heart of services that support them. All organisations working with children and young people are expected to have in place child protection procedures.

**Duty of Care:** Universities have a common law duty to take reasonable and necessary steps to ensure that children and young people are safe, and that preventable harm does not occur because of careless acts, deliberate acts, or omissions of the institution. These measures are in addition to those required under general Health and Safety requirements.

**Safer Recruitment:** Safe recruitment of staff and volunteers is central to our safeguarding commitment. We comply with the [Protection of Vulnerable Groups \(Scotland\) Act 2007](#). The PVG Scheme is managed by Disclosure Scotland. Any persons carrying out a **regulated role** whether through paid or unpaid work on behalf of the University of Strathclyde must comply with the University's checks and training as required.

**Age of Sexual Consent:** In the UK, a person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the [Sexual Offences \(Scotland\) Act 2009](#) for an adult in a position of trust to engage in sexual activity with a person under the age of 18. Everyone working and volunteering for the University, or acting on the University's behalf is in a position of trust when working with Children and Young People<sup>2</sup>. This protects young people aged 16 and 17 who, even though they are over the age of consent for sexual activity, could be considered vulnerable to sexual abuse and exploitation. No adult should ever have sexual intercourse or participate in any form of sexual activity, including paying for sex, with any person under 18 years old or under the local age of sexual consent (where higher). This applies to all representatives regardless of the age of consent locally. Mistaken belief in the age of the child is not a defence. The University's [Staff Personal Relationships Policy](#) outlines the university's position on relationships between members of staff and students. Mutual trust is the basis for staff-student relationships.

**The Prevent Duty:** This policy also supports and interacts with the university's approach to the Prevent Duty safeguarding individuals or groups who may be at risk of being drawn into terrorism ([Counter-Terrorism and Security Act 2015](#)). Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. The Prevent Duty is a government directive about protecting children from the risk of radicalisation and general safeguarding principles apply.

<sup>1</sup> The progress and actions that Ministers intend to achieve in relation to the rights of the child are summarised here: [Progressing the human rights of children in Scotland: 2018-2021 action plan](#).

<sup>2</sup> **Positions of Trust:** We have specific expectations upon the adult University Community in relation to children and young people under the age of 18.

- **Abuse of Trust - Section 42;** *A person commits the offence of sexual abuse of trust if he or she is aged 18 years or older and intentionally engage in a sexual activity with, or directed at, a person who is under 18 and in respect of whom the perpetrator is in a position of trust.*
- **Positions of trust - Section 43;** *Subsection (5, 127) provides that a position of trust is constituted where B is receiving education at a school and A looks after persons under the age of 18 in that school or where B is receiving education in a further or higher education institution and A looks after B in that institution.*

## Appendix B: General Signs of harm or abuse

Anyone working with children or young people needs to be vigilant to the following general signs of abuse and neglect. The child or young person may:

- Show changes in behaviour; immediate or over a period of time
- Appear afraid, quiet, or withdrawn or does not integrate
- Have injuries that do not reflect the activity the child or young person is involved in
- Cover arms and legs, even in hot weather, or without religious reasons
- Appear anxious, clingy, or depressed
- Appear afraid to go home or show an inexplicable fear of particular places or seeks excuses to avoid particular people
- Regularly flinch in response to sudden but harmless actions, for example someone raising a hand quickly
- Have angry outbursts or behave aggressively towards others
- Appear hungry, tired or unkempt, their appearance or hygiene may deteriorate
- Be left unattended or unsupervised or have too much responsibility for their age
- Have knowledge of 'adult issues' for example alcohol, drugs and/or sexual behaviour or language which is inappropriate for their age or stage of development
- Show risky behaviour such as substance misuse or criminal activity
- Self-harm or share thoughts about suicide
- Not receive adequate medical attention after injuries
- Have changes in eating habits or develop eating disorders
- Run away or regularly go missing from home, learning or care
- Regularly experience nightmares or sleep problems

## Particularly Vulnerable Groups

Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, disability or learning difficulties, communication needs or other issues and may be more likely to suffer abuse. Other groups that are more vulnerable are:

- Teenagers
- Children at risk of FGM (female genital mutilation)
- Asylum seekers
- 'Looked after' children
- Children living away from home
- Children living with parental substance misuse and parental mental ill-health
- Children or young people may be identified as requiring additional support. For example, this may be in relation to an additional learning or support need, through care or aftercare, youth justice or a health need any of which could be chronic, short, or long-term.
- Supported by a Care Plan or receiving multi-agency support
- Anyone not identified above but who has protection under the Equality Act 2010

We should be alert to signs of extremism to protect children and young people from these risks in a similar way to protecting them from harm and abuse. Extremism is defined as an opposition to fundamental values, e.g. democracy, law, liberty, respect & tolerance of other faiths & beliefs. It may include far right views, animal rights activism, & some religious fundamentalism.



We understand that the following factors make young people vulnerable:

- Pressure from peers & others or the internet
- Crime against them or involvement in crime
- Anti-social behaviour and bullying
- Family tensions
- Race or hate crime
- Lack of self-esteem or identity
- Personal or political grievances
- Isolation, withdrawal
- If they have witnessed, or are subject to harmful behaviours e.g., domestic violence

If there is a concern, you must report it in the same way as any other abuse and this in-turn may be referred to Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

## Appendix C: Definitions and terms used

### **Child**

In accordance with the United Convention for the Rights of the Child (UNCRC) and the [Children and Young People \(Scotland\) Act 2014](#), a child is anyone under 18 years of age. This definition is recognised internationally as identifying a population who are particularly vulnerable and require additional safeguards to protect their rights.

The definition of a child for the purposes of Safeguarding and child protection should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a person under the age of 18 may have reached the age of majority, age of sexual consent, voting age or such like does not alter their inherent vulnerability as a child.

### **Young Person**

A young person is aged 16-17. A term used interchangeably with child, this may include young volunteers, ambassadors, or work placements under the age of 18.

### **Safeguarding**

We are safeguarding when we take all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable groups from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across all our programmes. It requires us to proactively identify, prevent and protect against all risks of harm, exploitation, and abuse. If harm occurs, we must have accountable and transparent systems for response, reporting and learning from incidents. Our safeguarding procedures must be survivor-centred, and protect those accused of causing harm, until proven guilty. This is in line with a human-rights based approach for all.

### **Child Safeguarding and Child Protection**

Safeguarding is the process of protecting children from abuse or neglect, preventing impairment of their health and development. This includes the set of policies, procedures, and practices that we employ to ensure that the University is a child-safe organisation.

‘Child Protection’ is an element of safeguarding. If we have a concern that a child or young person has been harmed, or is at risk of significant harm then we have mandatory procedures to escalate a concern. We work with Local Authority and Government agencies.

### **Child Abuse**

Abuse and neglect are forms of maltreatment of a child. It constitutes anything which individuals, institutions or processes do, or fail to do, which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. Somebody may abuse or neglect a child or young person by inflicting, or by failing to act to prevent significant harm.

Abuse can happen anywhere and at any time, but research shows that the perpetrators of abuse are likely to be known and trusted by the child. A child or young person may be abused within a family or in an institutional setting. They may be abused by an adult(s) or by another child / children (this is also known as peer-on-peer abuse) and by those known to them or, more rarely, by a stranger. These actions may occur face-to-face, on or off campus, including via digital or online methods. Abuse can take place online, or technology may be used to facilitate offline abuse.

**Main categories of Child Abuse.** We refer to [NSPCC published definitions and signs of child abuse](#)

- **Physical Abuse:** Violence towards or the use of physical force that causes actual, or likely physical injury or suffering e.g. hitting, shaking, burning, female genital mutilation, torture, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse:** A form of abuse which may involve the persistent emotional maltreatment of an individual, such as, to cause severe and persistent adverse effects on emotional development. Behaviour which attacks a child's self-esteem. This may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving a child or adult at risk the opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child or adult at risk's developmental capability as well as overprotection and limitation of exploration and learning or preventing the individual participating in normal social interaction. It may involve any humiliating or degrading treatment such as name calling, constant criticism, belittling, serious bullying (including cyber bullying), causing individuals to frequently feel frightened or in danger, persistent shaming, solitary confinement and isolation, exploitation or corruption.
- **Neglect:** Persistent failure to meet a child's basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; inappropriate attention; failing to ensure adequate supervision; lack of safety or exposure to undue cold or unnecessary risk of injury, or failing to ensure access to appropriate medical care or treatment which is likely to result in the serious impairment of health or development. It may also include neglect of basic emotional needs.
- **Sexual Abuse:** Using a child for sexual stimulation or gratification. All forms of sexual violence, including incest, early and forced marriage, and sexual slavery. Child sexual abuse also may include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material. A form of abuse involving forcing or enticing a child, young person, or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at pornographic material, watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. While sexual abuse is predominantly perpetrated by adult males, women and other children can also commit acts of sexual abuse.
- **Child Sexual Exploitation:** Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them. Sexual Exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.



### Strathclyde's Children and Young People's Charter

If you are under 18, this matters to you!

We have worked with children and young people to adapt the [Wee Book of Promises](#) from the Children's Parliament, to communicate how the University supports children's rights.

#### United Convention on the Rights of the Child and the University of Strathclyde

The UN Convention on the Rights of the Child is an international law that recognises that children and young people in Scotland have rights. A guide for children and young people is available [here](#).

Rights are about making sure people are treated well and get a fair deal. They set out the sorts of things that must be put in place for this to happen. Everybody has rights, and everybody should respect the rights of other people to have a safe and happy society.

The University is committed to upholding children and young people's fundamental human rights to be safe and live free from harm. We call this safeguarding and we explain here how rights are supported by the University when anyone, under the age of 18, participates in activity with the University of Strathclyde.

1. The University recognises my right to be protected from abuse, neglect or harm and ensures that my rights as a child /young person are upheld at all times.
2. I will not be discriminated against because of my age, disability, gender, religion, care status, traveller status or economic background.
3. The University will listen to my ideas and respond quickly when I raise a concern or tell an adult something that is important to me, especially if it relates to my safety or wellbeing, learning, relationships or health.
4. The University upholds children's data protection rights. There may be circumstances when it is required to provide or share personal information about me when it is in my best interests. The University will share information about me if I am in danger of, or have been, harmed or to help find the right support for me.
5. If I am at risk of harm, or I think someone else is at risk of harm, then I know I can speak to an adult I trust – this can be any member of University staff, a member of security, a tutor, mentor, or the University Safeguarding Team.

6. If I am care-experienced, there is a designated person that I can go to if I need anything and the University supports me at all stages of my learner journey.
7. The University celebrates diversity and recognises that we all have a right to enjoy our own culture, use our own language and practise our own religion.
8. I feel included, that my opinions and rights are respected, and in turn, I respect the opinions and rights of others. I will not say harmful things or offend others in any of my communication, face to face or on social media.
9. The University is committed to helping me develop my skills and creates an environment in which I am safe to thrive and reach my potential. When I participate in any University activity, I will be safe and I will feel welcome, supported to make friends, and discover new interests. Accessible and inclusive Student Clubs and Societies can be an important part of University life.
10. I have the right to be protected from all types of abuse and neglect, being taken advantage of in any way, and illegal activity in all aspects of my life. For example, I should never be pressurised, forced, or tricked into doing anything sexual. There are also things that people should never make me do against my will, like make me marry someone. The University has zero tolerance for physical, emotional sexual abuse or neglect. This includes bullying, harassment, gender-based violence or exploitation including child sexual exploitation or child pornography.
11. The University will keep me safe and ensure proper care by those looking after me by ensuring that only those suitable to work with children and young people are employed whether their job is paid or they are a volunteer. Relevant background checks will be completed with all staff who come into contact with children, young people, and protected adults.
12. The University works with others to support me. For example, my school, parent or carer, doctor, important people involved in my care, programme mentor.
13. If someone violates the rights outlined above, or is suspected of abuse and breaking the law, the University Safeguarding Team will contact Police, Social Work or Child Protection team. The University has disciplinary procedures for Staff and Students. Essential information about me will be shared to protect or help me.