



Safe360^o™ Safeguarding Policy

Version	1.1 acknowledges new University Compliance Officer role and the Report and Support Response Team.
Owner (Directorates)	University Compliance Officer, with: <ul style="list-style-type: none"> • Student Experience • The Equality and Diversity Office • Human Resources • Safety, Health & Wellbeing
Author	Halena Gauntlett
Approval	<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^o™ Safeguarding Framework Proposal that was endorsed by Executive Team in March 2019.</p>
Publication Date	March 2022
Review Date	<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 undertake the annual review.</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>
Communication of Policy	<ul style="list-style-type: none"> • Policy and guidance are published on University Safe360^o™ web pages and Corporate Comms outputs • Linked through Strath App • Promoted through campaigns and partnership activity with Strath Union external partners • Updates will be shared in Newsletters • Tailored briefings • Operational Guidance

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Safe360^o™ Safeguarding Policy Statement

Every person has the right to live a life free from harm, abuse and neglect.

The University of Strathclyde is committed to creating and promoting a safe and respectful environment enabling students, staff and members of its community to learn, work and live free from harm, abuse, neglect or exploitation. Our social contract to take care of one another sits at the heart of this safeguarding policy.

The University of Strathclyde leads by example and seeks to ensure that safeguarding is evident and influenced at all levels and with a heightened focus on possible abuses of power that might lead to bullying, harassment, or sexual misconduct. All who govern University decisions work together to develop a culture that enables anyone to report concerns, and to monitor safeguarding protocol to identify, and address any gaps or weaknesses.

This policy applies to everyone working and volunteering for the University of Strathclyde, or acting on the University's behalf. It outlines our collective commitment to the care and protection of all who use, or are beneficiaries of our services, participate in activities organised by the university or those 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 policy. All members of the University community, regardless of age, gender, disability, ethnic origin, care or socio-economic status have a right to be protected from all forms of prejudice or discrimination.

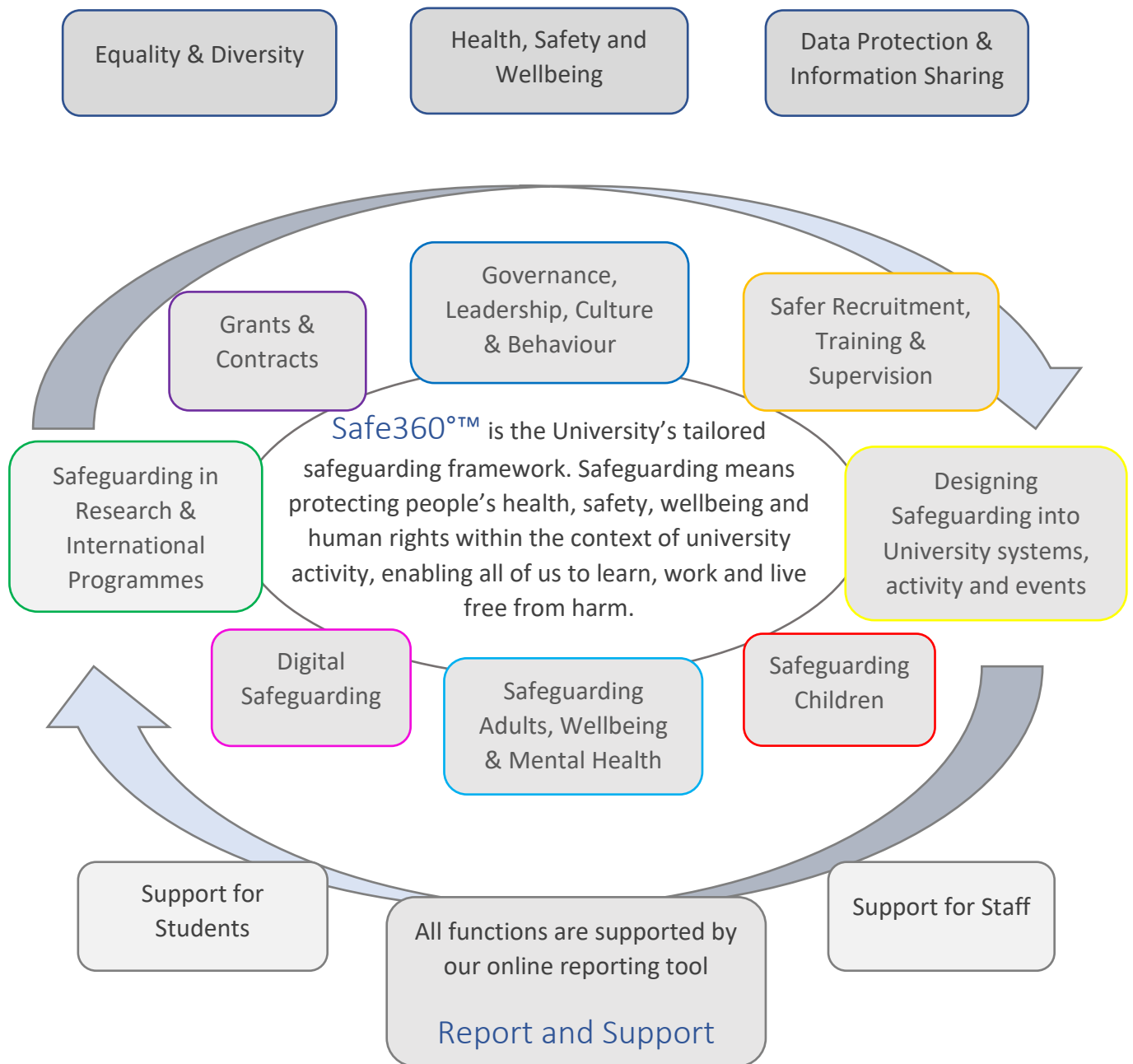
The university does not act *in loco parentis* (in place of a parent) for any student or staff member; but in general terms, the University has a duty of care to its staff and students, and to safeguard the welfare of children and adults. The following legislation underpins this policy:

- [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Bill](#)
- [Children and Young People \(Scotland\) Act 2014](#)
- [National Guidance for Child Protection in Scotland, 2021](#)
- [Adult Support and Protection \(Scotland\) Act 2007](#)
- [Disclosure \(Scotland\) Act 2020](#)
- [Sexual Offences \(Scotland\) Act 2009](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Data Protection Act 2018](#)
- [Equality Act 2010](#) and [Equality Act 2010 \(Specific Duties\) \(Scotland\) Regulations 2012](#)
- [Domestic Abuse \(Scotland\) Act 2018](#)
- [Adults with Incapacity \(Scotland\) Act 2000](#)
- [Hate Crime and Public Order \(Scotland\) Act 2021](#)
- [Human Trafficking and Exploitation \(Scotland\) 2015](#)

Related University priorities

This Safeguarding Policy is central to our University of Strathclyde Safe360™ Framework.

Underpinned by our People Strategy and collective commitment to the Student Experience, safeguarding is considered as the fourth pillar helping to deliver our socially progressive mission, and duty to deliver:



Related University policies, guidance and links for support are shared on the University's [Safe360™ webpage](#).

Section 1: Policy and Purpose

1.1 Purpose

Through this Safeguarding Policy we establish a unified understanding of safe and respectful behaviours. We aim to promote preventative safeguarding and are committed to ensuring that harmful or abusive behaviours will not be tolerated.

Safeguarding is everyone's responsibility and adhering to this policy keeps us all safe. It sets out our safeguarding principles, the procedure to follow to report a concern, and signposts where to go for advice when you need it.

This policy advises on what to do if you need to report a safeguarding issue personally, or if you receive:

- 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:

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

Person-centred, we respect the rights of all who become involved in the safeguarding process: The Reporter, Reported and any individual(s) who have complaints or accusations made against them.

1.2 Scope

All representatives noted below should be aware of their duty to comply with the policy, hold themselves to account and play an active role ensuring a safe environment for all.

- University Court and Senate Members, Trustees, Executive Team Representatives, Committee Chairs and Members, supported by Committee Managers.
- 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.
- Chief / Principal Investigators, Grant or Research Leads, Sponsors, Doctoral Researchers and all other team members working on behalf of the University.
- All students, including interns, exchange and placement students.

- Visitors, including individuals using the University's premises.
- Contractors, third party associates and volunteers working at the University.
- Some children and protected adults may have an appointed representative, e.g., mental health advocate, legal/enduring power of attorney.

This policy applies to all individuals working or acting on the University's behalf, including suppliers of goods and services.

See also, [Section 2: Roles & Responsibilities](#)

1.3 The aims of this policy and procedures are to ensure:

- We are all alert to signs of harm or abuse and all members of the University community are vigilant to the wellbeing of those around them.
- Everyone studying, working and volunteering for the University of Strathclyde, or acting on the University's behalf, consider safeguarding within the design and delivery of all University activity.
- Everyone within the scope of this policy can **Recognise, Respond** and **Report** safeguarding concerns.
- We promote clear procedures explaining next steps.
- Specific legislation that applies to children or vulnerable groups are upheld.
- Guidance provided by our funders and charity regulators is adhered to, and safeguarding is demonstrated within the grants and contracts process.
- We monitor activity to continually learn and improve our approach to safeguarding.
- A suite of guidance supplements this policy to provide detailed information to support operational teams in their application of safeguarding practices.

Related Policies and Procedures

- [Strathclyde Community Commitment](#)
- [Child Safeguarding Policy](#)
- [Gender-based Violence Policy: Staff and Students](#)
- [Let's Disclose It! Pledge](#)
- [Protecting Vulnerable Groups and Disclosure Checks Policy](#)

- [Applying with a criminal conviction](#)
- [Student Discipline Procedure: Non-Academic Misconduct](#)
- [Staff Disciplinary Procedure](#)
- [Complaints Procedure](#)
- [Grievance Procedure \(Staff\)](#)
- [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 \(Staff\)](#)
- [Guidance and Support for LGBT+ Students and Staff](#)
- [Dignity and Respect Policy](#)
- [Equality, Diversity and Inclusion Policy](#)
- [Staff Personal Relationships Policy](#)
- [Safety, Health and Wellbeing Risk Management](#)
- [Data Protection policy](#)

1.4 What is Safeguarding?

The university is a microcosm of society and safeguarding relates to everyone; incidents that cause harm, or failure to thrive, can happen to anyone. The University of Strathclyde is located in a city centre campus with global reach. We refer to probable statistics to understand the likelihood that Safeguarding issues in society, happen in the lives of those within our University community, in both the physical environment, and, increasingly, in the digital environment.

We define safeguarding as taking all reasonable steps to prevent harm, harassment or abuse from occurring; to protect all people, we are mindful that some individuals, particularly, children and adults at risk are inherently more vulnerable to harm, abuse or neglect. By safeguarding we can all provide greater protections and to respond appropriately to safeguarding concerns.

Safeguarding applies consistently and without exception across our programmes, partners, students, volunteers and staff. It requires a focus on prevention with proactive anticipation and mitigation of risk as far as is possible. Where incident occurs, to respond appropriately, with clear systems for reporting and learning from incidents.

1.5 Types of Abuse or Harm

Harm could be due to another person, or people, deliberately taking advantage of another, neglect would be the result of a failure by a responsible adult or care function. Peer on peer abuse is when a child or children harms another child.

The main categories of harm or abuse are Physical, Psychological / Emotional, Sexual, Financial Abuse, Neglect, Self-harm and Self-neglect. We also refer to the broad themes of Gender-based Violence (GBV); Hate Crimes; Child Abuse; Discrimination, Bullying and Harassment; Online Abuse; Trafficking, Slavery and Exploitation and Extremism. This list is not exhaustive.

A person can be subjected to harm anywhere: in their home, where they work, in a public place – often by the people closest to them, more rarely, by a stranger. Somebody may abuse or neglect a

person by inflicting, or by failing to act to prevent significant harm. It can even happen in the very places tasked with the responsibility of protecting them.

Harm and abuse may occur face-to-face, in personal and professional lives, on or off campus, including via digital or online methods. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Not everyone experiences the same level of risk. Factors such as protected characteristic, financial dependency, poverty, disability, homelessness, care of dependants or insecure immigration status can heighten vulnerability to abuse or further entrap people experiencing abuse.

1.6 Legal terms summarised, for the purpose of this Policy:

The university is a predominantly adult learning environment where children, young people and adults interact across physical, digital and global environments. This Policy articulates our commitment to support children, young people and adults equally, in an appropriate and timely way.

There are a number of different laws across the UK that specify age limits in different circumstances and protective interventions that dictate what legal measures can be applied, for example, child protection, positions of trust and consent. Where there is ambiguity about the status of a child or protected adult, our first response will always be to apply the higher level of protection. The University First Responder Network can provide guidance on a case-by-case basis.

Children

We refer to a child as anyone who has not yet reached their 18th birthday. A young person is a child aged 16 – 17 years old. These terms may be used interchangeably.

The University of Strathclyde works with children and young people directly, or indirectly in a range of ways and we recognise our role to deliver the rights of children as per the United Convention for the Rights of the Child (UNCRC).

Please refer to the University's [Child Safeguarding Policy and Child Protection Guidance](#).

Adults at risk

An adult is anyone aged 16 or over. The [Adult Support and Protection \(Scotland\) Act 2007](#) defines a vulnerable adult as a person of 16 years or over who:

- a) are unable to safeguard their own well-being, property, rights or other interests,
- b) are at risk of harm, and
- c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

An adult is at risk of harm* if:

- a) another person's conduct is causing (or is likely to cause) the adult to be harmed, or
- b) the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm.

Protected Adults

The [Disclosure \(Scotland\) Act 2020](#), defines a Protected Adult as any person aged 18 or over, as described within who by reason of physical, or mental disability, illness, infirmity or ageing has an impaired ability to protect themselves from physical or psychological harm, or requires assistance with the activities of daily living. They may also be homeless or have experienced, be experiencing, or at risk of domestic abuse.

A Protected Adult may also be defined as an adult aged 18 or over, who is being provided with a prescribed service; support, adult placement service, care home service, housing support service, community care service or welfare service.

1.7 Applicants, Students and employees under the age of 18

The University does not have a minimum age of entry and apprentices, or employees may be under the age of 18. the University's [Child Safeguarding Policy and Child Protection Guidance](#) provides further information and should be read in conjunction with this Policy.

Any application to work or study at the university from applicants who are aged under 18 years in the first Semester of their programme of study, or probationary period if staff, will be identified by age. This enables HR, Admissions staff, and Faculty staff to identify specific requirements that need to be satisfied for an offer to be made and appropriate safeguards will be applied when they commence their course of study or work, to help them prepare for the University environment, signpost the guidance, and support available.

1.8 Vulnerability within the University context

In addition to the groups defined within legislation, we also recognise that within a diverse student and staff population, or participants of research and beneficiaries of University programmes, there may be individuals who are personally or circumstantially vulnerable at any given time. People may have personal circumstances that are not necessarily within the University's control, but where the University may be a first point of contact and the likelihood of the University being approached for support is very high.

Coming to University may mean living independently or away from support networks for the first time, or interacting in unfamiliar or adult environments, navigating a new city or cultural environment, and seeking to make new connections. Transitions at different age and stage or adapting to change can raise challenges or be stressful and the support needed may vary.

Vulnerability can be due to visible or hidden disabilities, life changes, bereavement, housing issues, financial crisis or relationship problems. Some individuals can be at increased risk of harm or abuse, often due to circumstances beyond their control. Another person's conduct may cause (or is likely to cause) a person to be harmed e.g. gender-based violence, hate crime, or exploitation.

Through the course of our day to day lives, in our work and study, we should be alert to the needs of those who may be vulnerable because they:

- Are a child or young person, under 18 years of age
- Have a physical or learning disability / sensory impairment or special educational needs
- Are experiencing poor mental health such that their capacity is reduced and/or which may cause (or is likely to cause) self-harm or risk of suicide.
- Are elderly or frail due to ill health, physical disability, or cognitive impairment
- May be exposed to domestic abuse or gender-based violence, including coercive control
- Have a long-term illness / condition
- Are care-experienced
- Are a carer
- Live away from home or estranged from their immediate family
- Live in temporary accommodation
- Are homeless or living a transient lifestyle e.g., sofa surfing
- Do not have English as a first language
- Live in a chaotic or dysfunctional household, neglectful or unsupportive situation
- Live in an environment with substance abuse
- May be in recovery
- Are unable to demonstrate the capacity to make decisions and needs care and support
- Are from an asylum seeker/refugee background
- May be vulnerable to being bullied or discriminated against (this could include mistreatment on the grounds of race, disability, gender, ethnicity, sexuality, religion or beliefs)
- Are involved directly or indirectly with organised crime
- Are subjected to slavery, trafficking or sexual exploitation e.g., pressured into giving someone money or sex for rent
- Engage in sex work
- Are affected by criminal charges or history of criminal convictions
- May be vulnerable to financial harm or exploitation

This list is not exhaustive. It serves to illustrate the nature and breadth of lived experiences that may be disclosed or undisclosed. Issues referred to in this policy may affect any one of us. We can all be vigilant to and play our part in protecting everyone we learn and work with.

Through routine or frequent contact with students, colleagues or friends (maybe someone we see in lectures, pass routinely in the lab or workshop or share an office with), we may be well placed to observe outward signs of changing or unusual behaviours, changes in appearance, withdrawal, attendance or academic development. We should be mindful of those we see less frequently in

person, such as distance learners and visiting, temporary or distance staff who may not fully, or regularly, integrate with the wider university community through the course of their work.

1.9 Trauma-sensitive, compassionate, caring and non-judgemental

At any time, any member of the University Community may be a first point of contact for a person reporting a safeguarding concern. We are committed to understanding [trauma and trauma-informed practice](#) to ensure a responsive and supportive environment for disclosure by any member of the University Community.

Our support services are compassionate and non-judgemental and we commit to support anyone experiencing a safeguarding issue, anyone sharing a concern on behalf of someone, or who has a complaint to make about the conduct of others. We recognise that supportive relationships matter to build trust and empower individuals if a person feels comfortable sharing information, to think together about what might help and signpost the right support.

For the Reporter or the person who makes a disclosure, it is highly likely that they will have to recount their experiences multiple times. For example, Police or Social Work Services will speak with the individual and collect evidence. Empowerment is our aim is for the person being supported. We should be aware of complex feelings and responses that may be triggered. We will always communicate in a compassionate and empathetic way and be sensitive to previous experiences which may take a person back to a time of trauma.

We provide support for staff and students affected personally, or by issues raised, recognising that responding to safeguarding concerns can provoke personal feelings for any person supporting.

- All staff have access to the University [Employee Assistance Programme](#), PAM Assist, providing access to a 24hr helpline and an extensive online resource providing information and advice on a wide range of topics concerning work life, personal issues, health, and wellbeing, including legal advice and debt management.
- All Students can receive specialist expertise in mental health, counselling, wellbeing, disability and general health support through the [Disability and Wellbeing Service](#). 'The Service' contacts applicants who disclose a disability or medical condition during the application process in order to commence discussions about reasonable adjustments and support requirements. We have [Rape Crisis support on Campus](#).
- We are a member of the [Hidden Disabilities Sunflower Scheme](#). The Hidden Disabilities Sunflower discreetly indicates to people that the wearer may need additional support, help or a little more time. Hidden disabilities don't have physical signs and include learning difficulties, autism spectrum disorder, mental health as well as mobility, speech, visual or hearing impairments. They can also include asthma, COPD, and other lung conditions as well as chronic illnesses such as renal failure, diabetes, and sleep disorders when those diseases significantly impact day-to-day life. Sunflower lanyards may also be suitable for people who could experience secondary trauma or severe distress by wearing a face covering.

- We work with Choose Life to support suicide prevention through [Safer Suicide Strathclyde](#).
- The Access, Equality and Inclusion Service supports individuals traditionally under-represented in higher education. For example, targeted information before entry, a named contact and tailored support is available on an ongoing basis to those who have spent time in local authority care. Our [Care Experience Policy for Staff and Students](#) delivers a commitment set out in our [University of Strathclyde Corporate Parent Plan](#) . We support students with caring responsibilities; individuals estranged from their families (studying without family support) and within our LGBT+ Community [LGBT+ Policy](#).

Section 2: Roles and Responsibilities

2.1 Responsibilities

- **The University Compliance Officer** is the Lead for the overall Safe360^o™ 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.

2.2 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.

2.3 Digital Safeguarding Statement

We all have the right to expect the same standards of behaviour online as those expected in face-to-face interactions. If something is illegal or disrespectful face-to-face, then it does not make it acceptable to behave that way online.

Online abuse covers a wide range of behaviours and technologies. Abuse happens when someone acts in a way that causes harm and distress to others. Online abuse is any type of abuse that happens on the web, whether through social networks, personal devices, or online games. It includes cyberbullying, harassment, hate crime, revenge porn, grooming, sexual abuse, sexual exploitation, or emotional abuse. Children and adults at risk can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming) or it may be that the abuse only happens online (for example persuading children or adults at risk to take part in sexual activity online). Unfortunately, social media is also widely used by abusers, and many perpetrators who 'hide' behind the fact that they may not be able to be readily identified, say things that they would not consider saying face-to-face.

University guidance has been developed to educate [staff](#) and [students](#) in the safe and constructive use of digital technologies. We expect staff and students to model best practice in how they behave online in all locations on and off campus to ensure our University is operating in line with our values and within the law that provides the highest level of protection. They are held to account through the respective discipline procedures and involvement of Police.

The University supports staff and students in the pursuit of legitimate aims of research and will not tolerate abuse. Incidents of abuse can also occur inwardly. It can be obvious that someone is behaving in an abusive way but not always clear where the boundary falls between expressing a point of view and being abusive. Not only those in public facing roles or undertaking research may receive personal threats. Students or staff may be affected when sharing work or opinions and experiences related to study, or by affiliation to situations, organisations, products, people, and a wide variety of other topics.

Use [Report and Support](#) to report a concern about behaviour, conduct or content online. The University works closely with statutory authorities to protect the rights of staff and students. The Report and Support flowchart should be followed as with any safeguarding concern in the physical environment.

See [Section 4: Procedures](#)

The **Child Exploitation and Online Protection Agency (CEOP)** can also be contacted securely if you have been a victim of online abuse, or you are worried about somebody else. More information is available [here](#).

2.4 Developing an Active Bystander Culture

We work together to develop a culture that enables anyone to report concerns and to monitor safeguarding protocol to identify and address any gaps or weaknesses. This Policy appeals to every member of the University community to contribute to an active bystander culture and this policy and procedure is intended to support anyone to make an intervention or report a concern on behalf of a person they feel to be at risk, or something they witness, such as harmful behaviour.

A bystander is anyone who observes any situation. At times, we may witness events around us that make us feel uncomfortable. We can be faced with the dilemma to do something, or do nothing (a passive bystander). Being an active bystander means challenging prejudice and discrimination when you see it, in a way that feels safe for you. This may be to speak up, speak out, offer, or call for help.

2.5 Reporting misconduct

If you observe, or are concerned that someone in a position of trust is putting a person at risk, has caused harm, or is being neglectful, **do not ignore it. Speak up.** Report your concern using [Report and Support](#). This can be done anonymously.

2.6 Absolute Accountability and Failure to Comply

This policy communicates the attitudes and standards of behaviour expected of all members of the University Community, and set out in law.

It outlines the high standards for staff and students to uphold the rights of others as outlined in the [Dignity and Respect Policy](#). Failure to follow this policy may lead to disciplinary action as set out in the Student Disciplinary Procedure and Staff Disciplinary Procedure.

Actions which constitute safeguarding offences, are a breach to this policy and are illegal. In the case of behaviours likely to cause or result in harm, abuse, or neglect of a person(s), the University works with Police Scotland and other public agencies to support a lawful and respectful University Community and to address the illegal or harmful behaviours described in this policy.

[See Section 4: Procedures](#)

2.7 Safer Recruitment, Induction and Supervision

We comply with the [Disclosure \(Scotland\) Act 2020](#) to ensure that those who have regular contact with vulnerable groups, through the workplace, do not have a history of harmful behaviour. It will exclude people who, based on their past behaviour, are known to be unsuitable from working, paid or unpaid, with children and protected adults and detect those who become unsuitable while in the workplace.

Scottish Government information on types of Disclosure is available [here](#)

The University Policy and Guidance on the Protecting Vulnerable Groups is found [here](#)

Positions of Trust: Our expectations

We have specific expectations upon the adult University Community in relation to children and young people 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 People¹.

In the UK, a person can legally consent to sexual activity if they are 16 years old or over. This means that 16 is the age at which the law thinks you are old enough to say yes to having sex with someone else whether you are straight, lesbian, gay or bisexual. In Scotland, sexual intercourse with a child under the age of 13 is rape.

We refer to the [Sexual Offences \(Scotland\) Act 2009](#). It tells us that consent means "free agreement". It recognises the following situations where you cannot give free agreement:

- When someone is incapable of consenting because of the effects of alcohol or drugs
- When someone is asleep or unconscious
- When someone agrees because they are unlawfully detained

¹ **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.*

- When someone agrees because of threats of violence
- When someone agrees because the person is pretending to be someone else

It is also illegal under the Act, for an adult in a position of trust to engage in sexual activity with a person under the age of 18. It applies to all adults over the age of 18 who are in a position of trust with a child under the age of 18 and engage in a sexual activity with them. 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.

Never conduct intimate relations with a child or young person in your care. The [Staff Personal Relationships Policy](#) outlines the university's position on relationships between members of staff and students. Mutual trust is the basis for all staff-student relationships.

2.8 The Prevent Duty

This policy underpins the university's approach to the Prevent Duty. The Counter-Terrorism and Security Act 2015 places a duty on public bodies and universities to have 'due regard to the need to prevent people from being drawn into terrorism'.

'Prevent' is one of the four elements that make up the UK Government's Counter-Terrorism Strategy, CONTEST:

- PREVENT – to stop people from becoming terrorists or supporting terrorism
- PURSUE – to stop terrorist attacks in the UK
- PROTECT – to strengthen the UK's protection against terrorist attacks
- PREPARE – to mitigate the impact of terrorist attacks

Preventative activity in Scotland strives to address all forms of violent extremist activity to reduce the risk of terrorism so that citizens can live freely and with confidence.

As with our wider safeguarding endeavour to reduce the risk of harm to, or harmful influence on a person, early identification of risk to an individual is paramount. Where we identify a person may be vulnerable to extremist and terrorist narratives, we aim to give appropriate support and signpost guidance at an early stage. If you are concerned for a colleague, staff, or student who you feel is vulnerable to radical extremist ideologies, please report your concern through [Report and Support](#).

2.9 Working with others to safeguard

We recognise that relationships are key. Our safeguarding structure includes external partners from statutory (e.g., Police Scotland, child and adult social work services or medical professionals) and non-statutory bodies (e.g., charitable organisations, advocacy, gender, faith and race-based support agencies or community-based groups). Sometimes we refer to these as formal and informal agencies. The University will signpost agencies to provide expert support, assistance, or advocacy. We also work with partners for the purpose of training, development, and as critical friends.

We are proud of our partnerships. Collaborative activity with partners enables the movement of staff and students within diverse learning, social and work environments, to implement local, cross-border and international programmes and projects with a diverse range of beneficiaries including vulnerable groups.

We expect partner organisations to have their own policies, structures and reporting procedures for managing safeguarding issues and for University representatives to comply with local protocol. Where partner organisations do not have their own safeguarding protocols, we advise University representatives to contact the First Responder Network and adhere to this policy.

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 First Responder Network 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 First Responder 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

Online report is made via Report & Support

Disclosure made to staff, liaison with First Responder or Safeguarding Lead

Report & Support signposted, with option of staff assistance to complete a report or submission of report by staff member

1. Reports received and triaged by **Report and Support Response Team (RSRT)**. Assessed to establish immediate action needed, including protection of at-risk groups and Child Protection. **RSRT** may contact statutory agencies in an emergency or criminal incident, or advise Reporter to do so.
2. **RSRT** contacts the Reporter. Risk Assessment and mitigations undertaken consider the safety and wellbeing of all involved parties.
3. **RSRT** will advise the Lead of the University Incident Management Team if there is a significant risk to the wider community and / or the University.

At all stages of the process, continual assessment of support and risk mitigation is considered. **RSRT** signpost support, or refer to support services

Police involvement and / or referral to external agencies

Report is pursued under relevant University policy and procedure

Reporter requests no formal action to be taken

If no further action is requested, **RSRT** will assess the report for significant risk and mitigations.

University investigation and discipline process may still be pursued during criminal proceedings

RSRT meeting refers the case for formal University investigation with risk assessment and mitigation

Informal response or mitigations are considered with **RSRT**

RSRT will escalate if there is concern for harm, or risk to life.

RSRT assess for patterns or connected cases.

University investigation undertaken

Further action

Police involvement and / or referral to external agencies

Relevant University procedures are pursued

- Dignity and Respect Policy
- Student Disciplinary Policy
- Staff Discipline Policy
- Staff Grievance Policy
- Staff / Service Provider Complaints Procedure

No further action by the University.

Report and Support operational case review meeting with response offered to involved parties.

Sensitive data is held in line with R&S data retention policies.

What happens after an incident is reported?

When an incident is reported through [Report and Support](#), the First Responder Network, 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 University Compliance Officer 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.

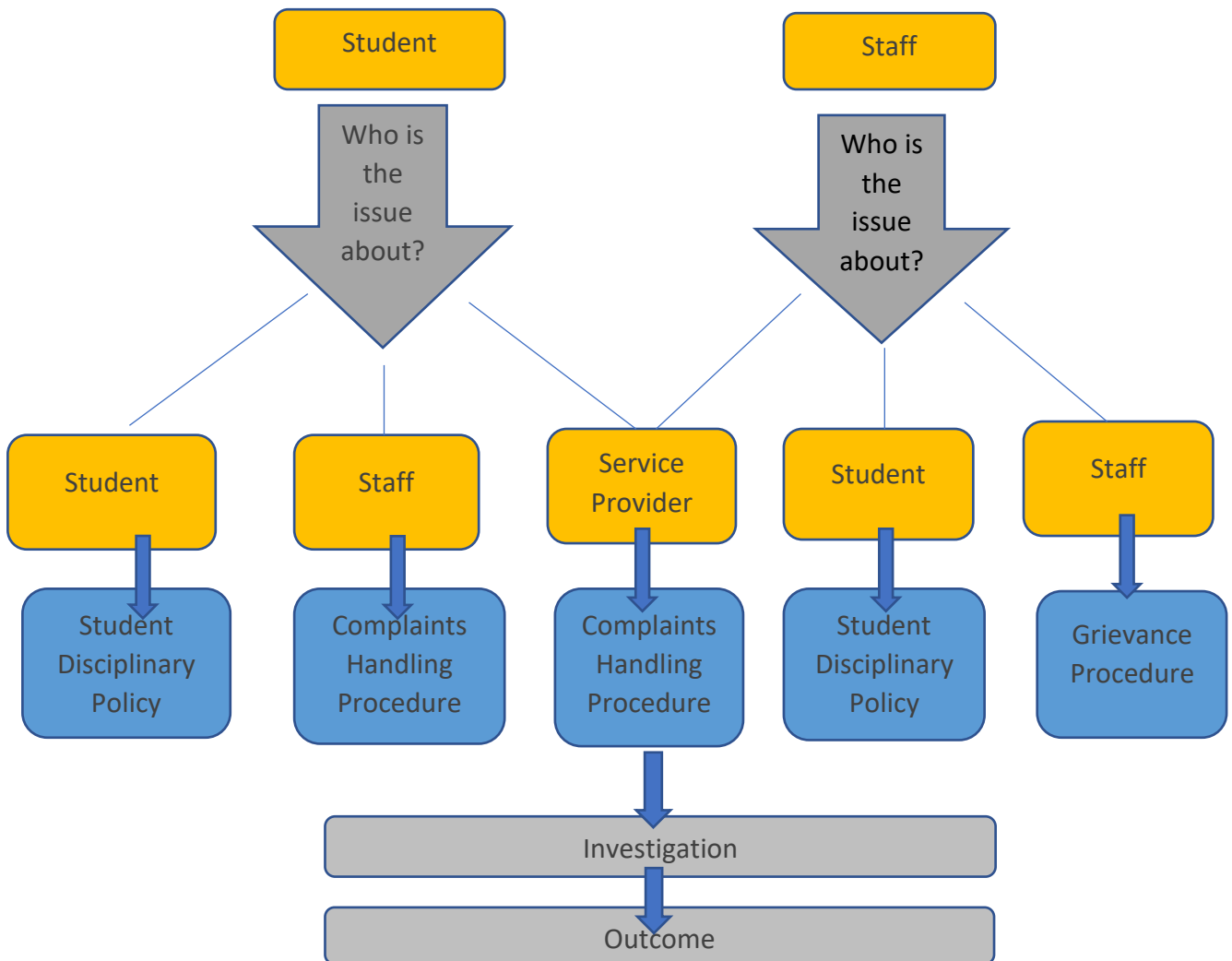
This is set out in the Incident Response Plan Flowchart and may be further escalated to the Incident Management Team, as necessary. The University's [Emergency Response and Business Continuity Management Policy](#) is supported by specific strategic plans for known emergency situations.

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 First Responder Network. 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 First Responder Network 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 First Responder Network 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.