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**Safeguarding Policy**

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1. **Introduction**

The University recognises that we have a fundamental responsibility to provide an environment in which individuals of all ages, whether student, staff, or visitor, may learn, develop and work, in a safe environment. This responsibility includes an ethical and moral duty to safeguard children, young people and adults at risk at any time when they are engaging with our staff, students and contractors in University-led activities, whether on or off of our campuses in Glasgow and London.

**Policy Statement**

This Policy represents the commitment of Glasgow Caledonian University (GCU) to protect children, young people and adults at risk who are experiencing, or at risk of experiencing, harm. The policy applies to all members of the University community, including staff (employees and casual workers), students, contractors/agency temps and visitors when working at both the Glasgow and London campuses.

It is recognised that members of the University community may come into contact with children, young people and adult at risk who are participating in University related activities, either on campus or elsewhere. This might include interactions with prospective students, current students, and others who are participating in our core activities of teaching and research or, for example, accessing our support services; taking part in recruitment, outreach and widening participation activities; volunteering projects, work experience or placements and other events taking place on University property.

Additionally, the measures outlined in this Policy supports the University’s [Prevent duty](https://www.gov.uk/government/publications/prevent-duty-guidance-for-specified-authorities-in-scotland/prevent-duty-guidance-for-scotland-accessible) and statutory responsibilities in relation to all members of the University community.

This policy provides a framework which aims to:

* Promote a culture in which signs of possible harm, mistreatment or neglect are recognised and appropriately acted upon;
* Provide all members of the University’s community with guidance on their responsibilities in relation to safeguarding;
* Describe the procedure that a member of staff should follow if they suspect a child, young person or adult at risk is experiencing, or at risk of experiencing, harm;
* Promote positive collaborative working within the University and with any external agencies involved; and
* Satisfy the University’s statutory duty in relation to Prevent and describe the procedure that a member of staff should follow if they suspect a member of the University community is a Prevent concern.

**Equality and Diversity Statement**

GCU is committed to providing a culture and environment which is inclusive of all sections of society and responsive to the needs of individuals. We do this by promoting equality, valuing diversity and ensuring that our University community adheres to our Dignity at Work and Study Policy.

In implementing this policy, the University will at all times remain mindful of its duty of care and its obligations under the Equality Act 2010 and will also remain mindful of the confidential and sensitive nature of fitness to study matters and of its obligations under General Data Protection Regulation (GDPR).

**2. Key definitions**

**2.1 Child and Young Person**

For the purposes of this Policy, children are defined as young people under the age of 18.

Section 93(2)(a) and (b) of the Children (Scotland) Act 1995 defines a child in relation to the powers and duties of the local authority. Young people between the age of 16 and 18 who are still subject to a supervision requirement by a Children's Hearing can be viewed as a child. Young people over the age of 16 may still require intervention to protect them. Scottish Law recognises that despite having full legal capacity at 16, young people under 18 can be vulnerable in certain situations.

**2.2 Adult at Risk**

The University recognises that within its diverse population there may be members who are vulnerable at any given time

Under section 3 of the Adult Support and Protection (Scotland) Act 2007, ‘Adults at risk’ are defined as adults over 16 years of age who:

* Are unable to safeguard their own well-being, property, rights or other interests;
* Are at risk of harm; and
* 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

All three elements of the definition must be met, and the presence of a particular condition does not automatically mean an adult is an ‘adult at risk’. A person may have a disability, physical and/or mental health condition and be able to safeguard their well-being and interests. It is the whole of an adult’s particular circumstances which can combine to make them more vulnerable to harm than others.

**2.4 Harm / Abuse**

Under Section 53 of the Adult Support and Protection (Scotland) Act 2007 ‘harm’ includes all harmful conduct and, in particular, includes:

* conduct which causes physical harm
* conduct which causes psychological harm (for example: by causing fear, alarm or distress)
* unlawful conduct which appropriates or adversely affects property, rights or interests (for example: theft, fraud, embezzlement or extortion)
* conduct which causes self-harm.

‘Conduct’ includes neglect and other failures to act, which includes actions which are not planned or deliberate, but have harmful consequences.

**2.5 GCU London**

In England there is a general principle that everyone who works with children has a duty to keep them safe and everyone who comes into contact with children has a role to play in sharing information and identifying concerns (Working Together to Safeguard Children – A Guide to multi-agency working to help, protects and promote the welfare of children (UK Government, Dec 2023). This Safeguarding of Children and Vulnerable Adults Procedure applies to both the Scottish campuses and London campus. In relation to England, children are defined as all those under 18 and the definition of adults at risk/vulnerable adults set out in the Care Act 2014 is “any person who is aged 18 or over and at risk of abuse or neglect because of their needs of care and support”. As in Scotland the terminology is complex but the priority is to report concerns where there is concern that a vulnerable person requires support. The process for checking the suitability of someone for employment in regulated work with children or vulnerable adults in England is set out in the Protection of Vulnerable Groups Act 2006 and checks are managed by the Disclosure and Barring Service.

**2.6 Student Visa Holders**

For children under 18 sponsored under a Student Visa, the university will require a letter of consent from parent(s)/legal guardian, for the purposes of consenting to their application, travel, reception and care arrangements in the UK. Children aged 16 and 17 have legal right to live independently in the UK and make their own accommodation arrangements, however they will require consent of the parent(s)/legal guardian to this. This letter should be provided as part of the admission process and retained on file.

**3. Responsibilities**

Safeguarding is the responsibility of everyone in the University community.

All members of the University community are expected to adhere to the relevant codes of conduct in the course of their studies and/or professional activities, both on and off campus.

**3.1 Staff**

All members of staff who come into contact with children, young people and adults at risk are in positions of trust and have a duty of care to act if there is a cause for concern.  All members of staff should therefore:

* Participate in appropriate safeguarding training as mandated by the University
* Understand what constitutes abuse and how it may be recognised
* Listen carefully to children, young people, adults at risk, and others who may be trying to voice concerns
* Take action in consultation with the University’s Safeguarding Team (see Appendix 1) where there is cause for concern (noting that acting within the scope of this Policy over-rides the University’s usual obligations under the General Data Protection Regulation)
* Refer any concerns to the University’s designated lead for Prevent where they believe that an individual may be at risk of being drawn into terrorism
* At all times, treat others with dignity and respect, as required by the University’s Dignity at Work and Study policy

It is not the responsibility of a member of staff to investigate, make judgements or provide a response on safeguarding matters, rather it is important to follow the Reporting Procedure (see Appendix 2) if they believe there is cause for concern.

Additionally, some members of staff are engaged for the majority of their time in caring for, supervising and advising children and/or adult at risk These staff are defined as undertaking work regulated under the Protection of Vulnerable Groups (Scotland) Act 2007 and are required to have PGV Scheme Membership. Students enrolled in certain courses of study are also required to obtain PVG Scheme Membership.

**3.2 Students**

Safeguarding is also the responsibility of students on degrees, or undertaking research where they will come into contact with children and adult at risk (e.g. in, Nursing, Social Work, and other health professions courses). All students are required to follow the Reporting Procedure within the setting that they encounter the child or adult at risk (e.g. placement provider) if they believe there is cause for concern. Placement Module Leads or Research project Supervisors are responsible for ensuring students are briefed on these matters prior to undertaking placements/research.

**4. Prevention**

The University is committed to the protection of children, young people and adults at risk. As such, the following steps have been taken:

**Recruitment of Staff**

The University has taken all reasonable and appropriate measures to ensure that unsuitable people are prevented from working with children and adult at risk. Where it has been identified that staff/positions are involved in regulated work with children/ adult at risk in the course of their employment, the University will follow the statutory guidance to ensure that, where appropriate, staff will join the Protection of Vulnerable Groups Scheme (PVG Scheme) which was introduced by the Protection of Vulnerable Groups (Scotland) Act 2007.

**Training**

The University has taken steps to ensure that all staff are aware of their responsibilities under this policy and where appropriate, we will raise awareness in line with this policy.

**5. Responding to Concerns**

The University encourages all staff and students to respond promptly to any concerns regarding potential harm, as covered under this policy. The University will investigate and where any member of the University community is found to have committed any act of abuse or harm or similar unacceptable conduct towards a child or adult at risk will be subject to disciplinary action in line with the relevant policy. In addition, that person may also be subject to criminal proceedings.

**5.1 Reporting concerns**

In the event that a member of the University community has been informed that abuse of a child or adult at risk is taking place they must report this to the appropriate member of the GCU Safeguarding Team (see Appendix 1 and Appendix 2).

Examples of when a report should be made include when:

* A child or at risk discloses abuse;
* A person makes an allegation of abuse about a member of the University community;
* There are suspicions or indicators that a child, young person or an adult at risk is being abused; for example, where there are observable changes in a child or protected adult’s behaviour that may be related to abuse; or
* The behaviour of any person towards a child or adult at risk causes concern or there is suspicion that a child or protected adult is being harmed
* A person makes a disclosure or demonstrates signs that they or someone within the University community are vulnerable

If a member of staff or student is unsure of whether a matter should be reported, it is their responsibility to discuss their concerns with a member of the Safeguarding Team.

Where members of the University community are working, studying or participating in events within a partner setting (e.g. an external school), the partner’s Safeguarding (or equivalent) policy and reporting procedures should normally be followed.  However, if for any reason these prove to be ineffective, the University’s reporting procedure should be followed.

Members of the University community working overseas are required to follow the standard reporting procedures (see Appendix 2) if they suspect a child, young person or adult at risk is experiencing, or at risk of experiencing, harm.

**5.2 Safeguarding Team and Designated Officer**

**Safeguarding Team**

The role of the University’s Safeguarding Team (See Appendix 1) is to:

* Undertake appropriate safeguarding training as mandated by the University
* Offer an initial point of contact, should any student or member of staff have any concerns relating to safeguarding
* Enable staff and students to meet their responsibilities towards safeguarding as expressed within this policy
* Maintain an up-to-date knowledge of safeguarding and oversee the provision of training to others as necessary
* Prepare a risk management plan in respect of students who are admitted whilst under the age of 16. This will involve consultation with academic departments, the Students’ Association and other relevant stakeholders including the student’s guardian or next of kin. A risk management plan will not normally be prepared for students that are 16 or 17 years old.

Liaison between members of the Safeguarding Team and the Designated Officer (including sharing relevant information, as deemed necessary), will occur in order to assess and manage risk, and to obtain a fuller picture of the concerns identified and parties involved

**Designated Officer**

The role of the Designated officer is to ensure the University meets its reporting requirement to the Office of the Scottish Charity Regulator (OSCR) under the ‘Notifiable Events Scheme’, by reporting any significant incidents.

Once the matter has been referred to the Designated Officer they or their deputy/nominated person will investigate the matter further. This may include but is not limited to:

* Collecting all relevant information and evidence relating to the case;
* Undertaking a risk assessment and ensuring that the individual is not in any immediate danger;
* Taking any action deemed necessary in the circumstances, such as accessing the emergency services and liaising with other external agencies such as the Police and Social work;
* Liaising with others within the University, as appropriate;
* Contacting parents or guardian unless this may place the child/ adult at risk in harm;
* Acting as the point of contact for any external agency throughout the investigation;
* Ensuring the University meets its reporting requirement to the Office of the Scottish Charity Regulator (OSCR) under the ‘Notifiable Events Scheme’, by reporting any significant incidents;
* Referring the matter to be dealt with under the relevant internal procedure, including but not limited to the Code of Student Conduct and the Conduct and Capability Policy.

**5.3 Reporting Safeguarding Concerns in Student Placements or in GCU Partnerships with other Organisations (e.g. Advance Higher Hub, Caledonian Club) or research participants.**

Where a safeguarding concern has been reported about a child or adult at risk in an external organisation such as a nursery, school, or student placement setting, the Safeguarding procedures in that organisation must be followed.

The Safeguarding Policy for Glasgow Caledonian University’s Students’ Association can be found [here.](https://www.gcustudents.co.uk/resources/safeguarding-policy-cc6c)

**5.4 Confidentiality**

Any initial disclosure of suspected harm to a member of the University community should be treated seriously and with sensitivity. The University may be required to share personal information with external organisations. This may happen due to a statutory or legal obligation.

We would not share personal data without consent other than where concerns exist regarding risk to the welfare of the person concerned.

**Appendix 1**

**GCU Safeguarding Team and Designated Officer**

**Designated Officer, Safeguarding**

VP People and Student Wellbeing

**Safeguarding Team**

Safeguarding Officer (Students): Director of Student Life

Safeguarding Officer (Staff/Protection of Vulnerable Groups Scheme); Directorof People Services

Safeguarding Officer (Research): Chair of the University Research Ethics and Integrity Sub-committee

Safeguarding Officer (Prevent): Head of Security, Resilience and Development

Health and Safety Advisor

**Appendix 2**

**Safeguarding: guidance and reporting procedure for staff**

If a child, young person or adult at risk makes a disclosure to you, it is important to:

• Take everything that is said seriously

• Remain calm and listen carefully

• Reassure the person that they have done the right thing by disclosing

• Explain to the person what you will do next and who you will need to inform.

It is important NOT to:

• Ignore the disclosure

• Panic

• Question the individual further (but if necessary you may seek to clarify what has been disclosed using open questions)

• Make any promises of confidentiality

• Assume anything or elaborate in your notes

• Investigate, make judgements or provide a response.

The flowchart below shows the steps that should be taken if, as a member of staff of the University, you have concerns that a child, young person or adult at risk is experiencing, or at risk of experiencing, harm.

**Safeguarding Reporting Procedure**

**You receive information which suggests a child, young person or adult at risk is being harmed, or is at risk of harm**

Write down all the details about the concern and details of where and when the conversation happened; record as much details as possible about what the person said (try to use their words rather than paraphrasing)

Ensure the immediate safety of the person (s) in question (e.g. they may need emergency accommodation)

\*The university will only refer on to external bodies or authorities, where it is deemed necessary by the Lead Safeguarding Officer for reasons of safety or public interest, or where there is a legal obligation to do so

The member of the Safeguarding team consults with other members of the Team and/or makes a direct referral to the Designated Safeguarding Officer who, where appropriate \*, will then:

* Make a referral to the local Social Care Services or follow the Prevent Referral Process
* Contact the police
* Take steps to initiate the appropriate staff or student disciplinary procedure
* Consult with relevant colleagues

Report the above as soon as possible to the relevant GCU member of the GCU Safeguarding Team

Inform the person that you need to pass the information on but that only those that need to know about it will be told

Write down all the details about the concern and details of where and when the conversation happened; record as much details as possible about what the person said (use their wording rather than paraphrasing)

Equality Impact Assessment

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| **1. DESCRIBE** |
| 1.1. Name of policy/strategy/decision |
| Safeguarding Policy |
| 1.2. Owner |
|  |
| 1.3. Date |
|  |
| 1.4. Aims of policy/strategy/decision |
| This Policy represents the commitment of the University in its obligation to protect   * children, young people and adult at risk who are at risk of harm, abuse, neglect, exploitation or discrimination; and * discharge its responsibilities in relation to Prevent. |
| 1.5. Who does the policy/strategy/decision affect? |
| Students, staff (employees and casual workers), applicants, visitors, contractors/agency temps |
| 1.6. Could there be any potential implications for equality, or people with protected characteristics? |
| This policy aims to support the principles of Equality & Diversity, and relevant members of the University community are protected. |

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| **2. ASSESS** |
| What are the implications, positive or negative (and evidence for this) of the policy/strategy/decision in relation to GCU’s duty to have due regard to the need to: |
| 2.1. Eliminate unlawful discrimination, harassment and victimisation? |
| There is likely to be a positive impact on this duty as it is highlighting that GCU recognises the needs for the duty of care to respond appropriately to situations where there are concerns regarding children and adult at risk who are at risk of harm, abuse, neglect, exploitation or discrimination, or concerns in relation to Prevent. |
| 2.2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it? |
|  |
| 2.3. Foster good relations between people who share a protected characteristic and those who do not share it? |

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| **3. ACTION** |
| 3.1. If a negative impact has been identified, how will this be addressed? |
| Until the Policy and action plan are implemented, it is not possible to gauge any negative impact. However, the implementation process will be monitored and data will be gathered any negative impact will inform the future review process of the Policy and guidance. Overall, there is no direct negative impact on the protected characteristics, as this applies to all students and the principles of the policy support equality and diversity. Although the policy itself is free from discrimination overall, ultimately it is the application and implementation of the policy that provides the scope for discrimination e.g. prejudices or attitudes of staff supporting their students. |
| 3.2. If changes have been made to the policy/strategy/decision as a result of this assessment, outline the changes |
| N/A |

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| **4. MONITOR AND REVIEW** |
| 4.1. How will the implementation of the policy/strategy/decision and its impact on equality be monitored and reviewed? |
| The Policy will be reviewed every two years |

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| **5. PUBLISH** |
| Please email this completed form, along with the policy/strategy and any other relevant information[[1]](#footnote-1) to [equality@gcu.ac.uk](mailto:equality@gcu.ac.uk) for publishing on the Equality and Diversity website and annual reporting in line with Equality Act 2010 requirements. |

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| **6. SIGN OFF** | |
| 6.1. EIA Owner Date | |
|  |  |
| 6.2. Equality and Diversity Advisor Date | |
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1. [↑](#footnote-ref-1)