



University of  
**Strathclyde**  
**Glasgow**

# Safe360<sup>°</sup>™ Child Safeguarding Policy and Child Protection Procedure Policy/Procedure

## Contents

1. Introduction.....	1
2. Governance.....	2
3. Principles.....	4
4. Scope.....	4
5. Legal Context.....	5
6. Definitions.....	6
7. Recognising the potential for harm and reducing risk.....	6
8. Reporting concerns and incidents.....	9
9. Further information and resources.....	9
Appendix 1: Child Protection Reporting Procedure.....	10
Appendix 2: The Safe 360 <sup>°</sup> ™ Framework and related University policies.....	18

**Policy Owner:** University Compliance Office

**Last Review Date:** February 2025

## I. Introduction

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. This policy and our approach are underpinned by the [Strathclyde Community Commitment](#).

The University's general approach to safeguarding is contained in the Safe360° Safeguarding Policy.

This policy concerns the University's obligations, commitment and approach to safeguarding children and young people. Although the University is primarily a place of adult teaching, learning and research, we engage with children and young people in a variety of settings:

- Undergraduate students who commence study under the age of 18, who may also be resident in University Accommodation
- Members of staff who are under 18
- Young Strathclyde programme
- Open and Applicant Days, and other student recruitment activities
- Outreach and widening access activities
- children and young people as research participants
- Staff and students who have dependent children who may engage with University activities, services or social functions.

In addition to safeguarding risks and concerns that arise within the University's own activities, we may also become aware of a safeguarding risks or concerns that arise outside our community or context. We nevertheless have a duty to ensure that we respond appropriately to such concerns where they become known to us.

How we respond to a concern is discussed in the Child Protection Procedure which forms an appendix to this policy.

## 2. Governance

The Safeguarding Committee, a University Committee reporting to [Executive Team](#), provides governance, accountability and oversight of all safeguarding activities across the University relating to staff, students and visitors. University Court receives an annual Safeguarding report. One member of [University Court](#) has the responsibility of Safeguarding Lead on Court.

The University's Designated Safeguarding Lead (DSL) and Chair of the Safeguarding Committee is the University Compliance Officer (UCO). The UCO is supported by the Safeguarding Team.

This Policy and its operation are overseen by the Safeguarding Committee.

### 2.1 Responsibilities

All University staff have a responsibility to be alert to potential safeguarding issues and concerns, and to report concerns appropriately. The University encourages its community to contribute to an active bystander culture and this policy is intended to support anyone to report a concern on behalf of a person they feel to be at risk, or something they witness, such as harmful behaviour.

Line managers and staff planning University activities should, as a matter of routine, consider safeguarding in planning and undertake appropriate risk assessments for activities and projects and partnership working.

The following staff and departments have additional responsibilities in ensuring safeguarding processes and procedures are effective, and that concerns are responded to appropriately.

<b>Department or role</b>	<b>Safeguarding role</b>
University Compliance Officer	Designated Safeguarding Lead
University Secretary	Prevent Lead
Safeguarding Team	<p>Ensuring that University policies, procedures and systems support the University's safeguarding task.</p> <p>Provide advice and support to staff and student dealing with any matter relating to safeguarding.</p> <p>Advice and support to staff affected by a safeguarding concern.</p> <p>Ensure responses to safeguarding concerns are appropriate and timely.</p>
Directorate of Safety, Wellbeing and Resilience	Provide immediate response to on-campus issues through Security Services; oversight of risk management; support to staff.
Directorate of Student Experience	Support students affected by safeguarding issues; Manage Report and Support; manage outreach and widening access activities including Young Strathclyde.
Directorate of Human Resources	Oversight of staff disciplinary matters, staff grievance, and advice to line managers and heads of department on staffing matters.
Directorate of Education Enhancement	Oversight of student disciplinary matters and the Student Discipline Procedure and Procedure; management of Degree Apprenticeships.

## 2.2 Strath Union

Strath Union operates its own safeguarding policy and procedures. The University works collaboratively with Strath Union to address safeguarding concerns. Strath Union may raise a safeguarding concern with the University. The University may decide to make the Designated Safeguarding Lead of Strath Union aware of a safeguarding concern if that concern is relevant to the work of Strath Union and the disclosure of such information may mitigate further risk of harm.

## 3. Principles

In addition to the general safeguarding principles contained in the Safe360° Safeguarding Policy, the University also recognises and endorses additional principles in relation to children and young people enshrined in:

- The UN Convention on the Rights of the Child (UNCRC), which is incorporated into Scots Law
- The Scottish Government's Getting It Right for Every Child (GIRFEC) principles, policy and guidance

Guided by these principles:

- We will ensure the welfare and wellbeing of every child is paramount.
- We will 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.

## 4. Scope

This policy applies to all University-related activities, including but not limited to:

- Delivery of teaching and learning

- Research activity including postgraduate degrees as this affects students and staff. Safeguarding of research participants is a matter for the University Ethics Committee.
- Provision of goods and services
- All University business conducted on or off the premises
- Physical and digital environments operated under the auspices of the University
- Social media and online activity of staff and students
- Social and sporting activities occurring on University premises or under the auspices of the University or where the University has assumed a responsibility.

Our safeguarding task applies to staff, students and others associated with the University through University activity.

Where a safeguarding concern arises outside our activities, we will work to ensure that the concern has been appropriately raised and referred to an appropriate organisation.

## 5. Legal Context

The University does not act *in loco parentis* (in place of a parent) for students or staff members, except in its role as a corporate parent under the Children and Young People (Scotland) Act 2014. The University has a common law duty of care to its staff and students, and to safeguard the welfare of children and vulnerable adults. When making a safeguarding assessment we consider additional factors that may heighten vulnerability and when considering child protection, we consult published National Guidance for Child Protection in Scotland. The following legislation underpins this Policy:

- [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#)
- [Children and Young People \(Scotland\) Act 2014](#)
- [National Guidance for Child Protection in Scotland 2021 - updated 2023](#)
- [Disclosure \(Scotland\) Act 2020](#)
- [Sexual Offences \(Scotland\) Act 2009](#)
- [Counter-Terrorism and Security Act 2015](#)
- General Data Protection Regulation and [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](#)
- [Protection of Vulnerable Groups \(Scotland\) Act 2007](#)
- [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#)

Relevant University procedures and policies that relate to this document are listed in Appendix 2.

## 6. Definitions

### 6.1 Safeguarding

For the purposes of this policy 'safeguarding' refers to the obligations, policies, procedures and practice of the University in reducing the potential for harmful behaviours such as abuse, neglect or exploitation towards staff, students and/or the community and in responding to reports of such behaviour.

### 6.2 Children and young people

Throughout this policy, 'child' refers to anyone under 18 years of age. The term 'young people' or 'young person' may appear in internal or external guidance and is generally used to refer to children aged 16 or 17.

## 7. Recognising the potential for harm and reducing risk

### 7.1 Risk Management

Safeguarding forms an integral part of the University's approach to risk management under the [Risk Management Framework](#).

As noted in section I, the University engages with children and young people in a wide range of contexts. Any University activity intended for or likely to involve children and young people must be risk assessed specifically for potential child protection risks. Other risk assessments should consider whether children or young people may be impacted, even indirectly, by the activity under consideration.

## **7.2 Sexual offences and Positions of Trust**

Under the Sexual Offences (Scotland) Act 2009, staff working in the University may be regarded as being in a Position of Trust in relation to any student who is under the age of 18. Any sexual activity between a person in a Position of Trust with a student under the age of 18 is a criminal offence.

The University's Staff Personal Relationships policy prohibits intimate relationships between staff and students under the age of 18. A breach of this policy will result in disciplinary action including dismissal and may also constitute a criminal offence.

Staff Personal Relationships with students over 18 are strongly discouraged.

## **7.3 Students who are under 18**

The University may recruit students who have not yet reached the age of 18 at the point of registration. Arrangements for the admission and registration of such students are governed by the University Admissions Policy. In exceptional circumstances, a student who is under the age of 16 may be recruited to a programme of study. In such cases an individual risk assessment for that student must be undertaken before registration can be permitted. Registration should not be permitted in cases where safeguarding and wellbeing concerns for that prospective student cannot be adequately mitigated.

All students who are under the age of 18 are required to provide a Wellbeing Contact at registration. This is optional for students over the age of 18.

## **7.4 Staff who are under 18**

The University employs staff who are under the age of 18. Line managers and Heads of Department must ensure that duties allocated to such staff are appropriate to their age. Further, in the event of a wellbeing or safeguarding concern relating to such a member of staff, their age will be considered a factor that escalates their need for protection. A safeguarding concern relating to a member of staff who is under 18 will be dealt with under the Child Protection Procedure at Appendix I.

## 7.5 IT services and young people

The University provides IT services to staff and students that are appropriate for use by adults. Students and staff who are under 18 access University IT services on the same basis as other users. From Academic Year 2025-6, communications to students under the age of 18 and to adults with responsibility for them will make this clear. Children and young people who are not registered students nor applying for admission may be given temporary access to University IT services in accordance with the [University Policy on Children Accessing University of Strathclyde Provided IT Systems](#).

## 7.6 Safer staff recruitment

Safer recruitment is an integral element of our safeguarding task. The University's policy on [Protecting Vulnerable Groups and Disclosure Checks](#) sets out the requirement for University staff undertaking regulated work to have membership of the Protection of Vulnerable Groups (PVG) Scheme and for those in teaching and learning roles to undergo a basic disclosure check. Staff who routinely work with children or young people will be required to have membership of the PVG Scheme unless their work does not fall within the definition of 'regulated' work under the PVG Scheme.

## 7.7 Partnerships and contractors

The University expects partner organisations with whom we undertake research, innovation, knowledge exchange and teaching and learning activities to have robust safeguarding policies and processes in place. Where a safeguarding concern arises in the context of a partnership arrangement, reference will be made to the nature of the concern and its locus of origin, and the relevant partnership agreement, to determine how such concerns are most appropriately progressed.

We expect those contracted by the University to provide services to similarly operate appropriate safeguarding procedures and for contractors operating in University premises and online environments to be aware of and respect the University's standards of behaviour outlined in our Strathclyde Community Commitment.

Particular attention and due diligence must be undertaken where such arrangements may involve engagement with or provision of services to anyone under the age of 18.

## **8. Reporting concerns and incidents**

All safeguarding concerns relating to children and young people will be handled in accordance with the Child Protection Reporting Procedure.

## **9. Further information and resources**

Further information, guidance and resources relating to Child Protection and Safeguarding can be accessed on [the University of Strathclyde Safe360° web pages](#).

## Appendix I: Child Protection Reporting Procedure

### Child protection and the University

Child protection concerns may arise in a range of contexts, including but not limited to:

- Where harm originates within the University community, for example from the action or neglect of a member of staff, or a student.
- Where harm originates elsewhere, but impacts a member of the University community, for example a young person studying at the University who is at risk in another context, such as the home.
- Where harm originates elsewhere and does not directly impact a member of the University, but the University has become aware of the harm or risk. For example, a child who is visiting the University discloses a risk to a member of staff or a student.

Even if the risk to a child lies wholly outside the University context, we may still be obliged to ensure that it is reported appropriately. When making a safeguarding assessment we take into additional factors that may heighten vulnerability. Safeguarding and child protection considerations may also apply to pre-birth safeguarding, and we consult published National Guidance.

### How do I identify a child protection concern?

A child protection concern may arise through:

- **A direct disclosure of concern for or by a child**  
The child themselves may disclose to you that they are at risk, or someone who works with or cares for them may disclose the concern. A concern may also be disclosed by a friend.
  - *Example: a child may disclose to you that they are experiencing abuse in their home environment or at school*
- **Indirectly, through a disclosure of other concerns or issues**  
You may become aware of a risk to a child through responding to another concern. For example, you may be dealing with a concern that relates to an adult and discover that a child is also at risk.
  - *Example: in supporting an adult student who is experiencing abuse, you may discover that they have dependent children who are also at risk*

- **Observed behaviour or incident**

You may observe an incident or notice behaviour that causes you to believe a child is at risk.

- *Example: you may discover that a child has been exchanging inappropriate personal messages or content with an adult in a position of trust (for example, a member of staff)*

More information on warning signs of abuse and other safeguarding concerns can be found on [the University of Strathclyde Safe360° web pages](#).

## Responding to a child protection concern

This section gives guidance on what to do if you have a concern about a child at risk.

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

We use the term **Reported Person** to describe a person who is accused of causing harm or is considered a cause for concern.

We use the term **Person at Risk** to describe a person who may be experiencing harm or be at risk of harm, including a child.

In this guidance, we use the term “**child**” to refer to anyone under the age of 18.

### **If you believe there is a concern:**

Try and gather as much information as you can that may be relevant to the situation, but only if it feels safe to do so. The guidance below may help you think about what information may be relevant.

### **How to respond sensitively**

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

### Questions to consider when you think about the child:

- Are they/do they feel safe right now? Ensure the immediate safety of the Person(s) at Risk. Are there any simple steps you can take to deal with this?
- Do they require immediate medical assistance?
- What form of harm are they experiencing / have they experienced? It may be that they have not yet experienced harm but appear to be at risk of harm in the future. They may also be reluctant to elaborate on the harm, in which case, do not pressure them to do so.
- Is there a threat or danger for the Person at Risk? It may be immediate or anticipated later, perhaps when they return home, or on the route home?
- Consider additional factors that may heighten vulnerability e.g. protected characteristics.
- Pre-birth safeguarding considerations, for example violence or risky behaviour that puts a pregnant person at risk.
- If you are responding to specific incident, when and where did this take place?
- Are any others involved or at risk?
- Does anyone else know about this concern? Has this been reported elsewhere?
- What does the child need from you at this moment? Are you able to provide this (do you have the knowledge or skills needed) or is there someone else who has the knowledge and skills to do so?
- Can you safely and sensitively gather information that might help agencies who can support the child? For example, names, addresses, contact details, dates of incidents.
- Are relevant authorities (e.g. the Police, a GP service, Social Work or the child/young person's school) already aware of the issue?
  - If it was reported to a relevant authority, when and how and to whom was this done?
- Is there any evidence that you can safely gather and store or ask the Person at Risk/Reporter to keep?
  - If the concern involves online harm, can someone safely screen shot messages etc before blocking a user?

## **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. Open questions (e.g. “tell me what you’re worried about” or “tell me what happened”) are preferable to 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 reported person
- Be aware that your own feelings may differ from the Reporter.

**Make the Reporter aware 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 harm or abuse will only be shared within the University with the Report and Support Response Team and Safeguarding Team to make decisions about next steps and to keep them safe, as well as identify the right support for the Person at Risk. If a child is at risk, we will normally inform the relevant Social Work service. If there is an immediate risk of serious harm – for example an active suicide risk, or risk of serious assault - we may need to contact emergency services.

### **Bear in mind that a child/young person may:**

- Be unsure or unaware that what they are experiencing is abuse or presents a risk.
- Be fearful that they will not be believed.
- Be bound to secrecy by an abuser.
- Be dependent on the abuser (e.g. financial, emotional or housing)
- Be 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.
- Have been made to believe that they have done something wrong, have committed an offence or will get into trouble if they disclose abuse or harm.

- Be experiencing peer on peer abuse. A child may have harmed by another child or is also at risk of such harm.
- Have committed an offence against or be involved in an offence against a child.
- Be involved in other illegal activities that makes them reluctant to disclose any harm.

**Maintain discretion:** Never disclose or discuss any child safeguarding concern, incident or case that you are involved in, except with the staff dealing directly with the concern. It is not your role 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 responding to a safeguarding concern, including supporting a person at risk who chooses to disclose to a safeguarding issue, these can raise difficult, traumatic or triggering feelings for you, or may make you also feel at risk. The University can provide support for staff through the Staff Wellbeing Hub, Occupational Health and Human Resources or support for students through Student Experience should wish you to discuss your feelings and response at a later stage. The Safeguarding Team are available to advise on appropriate internal and external sources of support.

## How to report a child protection concern

**In an emergency** (e.g. an immediate risk of harm, ongoing incident, active threat)

- **Call 999;** and/or
- **Contact University Security Services** if an immediate, on campus response is needed. Security Services can contact emergency services and can facilitate their access to campus buildings as necessary.

Please provide details on [Report and Support](#) after making the initial call and the immediate incident has been dealt with. This makes the Safeguarding Team aware and allows us to track any follow up actions that may be necessary.

**Out of office hours, if a response may be needed before the next working day:**

- Call University Security. They can alert a manager on call to take further action as necessary; or
- Call the Police on 101; or

- Contact Glasgow Health and Social Care on 0141 287 0555

Please provide details on [Report and Support](#) *after* making the initial call and the incident has been dealt with. This makes the Safeguarding Team aware and allows us to track any follow up actions that may be necessary.

**During office hours, or if your concern does not require a response before the next working day:**

- Inform your line manager, supervisor or Head of Department; and/or
- Report using [Report and Support](#); or
- Contact the Safeguarding Team at [safeguarding@strath.ac.uk](mailto:safeguarding@strath.ac.uk)

## How the University will follow up a concern

The Report and Support Response Team will consider any reported concern and will identify appropriate next steps.

We may need to engage with you, as a Reporter, for further information and assistance in responding to a concern. Any action staff are asked to take will be appropriate to their role within the University.

Where there appears to be a protection concern for a child/young person:

- The concern will be reported to the University Compliance Officer (UCO) as Designated Safeguarding Lead, who will be consulted on and informed of progress in any response.
- The Report and Report Response Team will seek to establish whether there is a potential risk of harm, or there has been a report of harm already experienced.
- We will seek to establish whether other agencies have already been made aware of the concern.
  - If not, we will consider whether it is appropriate for the University to:
    - Make a report to the Police, Social Work or another agency, and/or

- Pass the concern to another responsible organisation, for example a child's/young person's school.
  - In cases where the UCO believes there to be a credible risk of harm, a report will be made to relevant authorities unless there is a clear confirmation that such a report has already been made or it is more appropriate for another organisation to do so, in which case we will share relevant information with that organisation.
- In the case of a child who is a registered student, we will consider whether their Wellbeing or Emergency contact should be informed. In doing so we will follow the procedure described in the [Emergency and Wellbeing Contact Procedure & Guidance](#). The fact that a student is under 18 years of age will escalate the seriousness of any concern under this procedure.
- In the case of a child who is a member of staff, consideration will be given, in consultation with Human Resources, as to whether it is appropriate to contact the staff member's emergency contact.
- We will consider what support can be offered to the Person at Risk and to any Reporter or others associated with them. This support may be through internal services such as the Disability and Wellbeing and Student Support and Advice teams or through a referral to an external agency.
- Where a child appears to be at risk or to have experienced harm as a result of the actions or neglect of a member of staff or a student, consideration will be given to formal internal processes such as Student or Staff Discipline. Notwithstanding any internal procedure, we may also report any apparently criminal behaviour to the Police.

## Further information and advice

[The University of Strathclyde Safe360° web pages](#)

[Report and Support](#)

### Glasgow Health and Social Care

<https://www.glasgow.gov.uk/reportconcernschild>

Office Hours: 0141 287 0555

Out of Hours: 0300 343 1505

## **Other External Agencies**

**Childline:** Anyone under 19 years of age can contact Childline for advice and support:

Tel: 0800 1111 <https://www.childline.org.uk/get-support/> (email support, online chat and BSL support also available)

**Childline Report Remove:** Childline service for support with online abuse

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/>

## **NSPCC Helpline**

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/nspcc-helpline/>

Tel: 0808 800 5000

## **Child Exploitation and Online Protection**

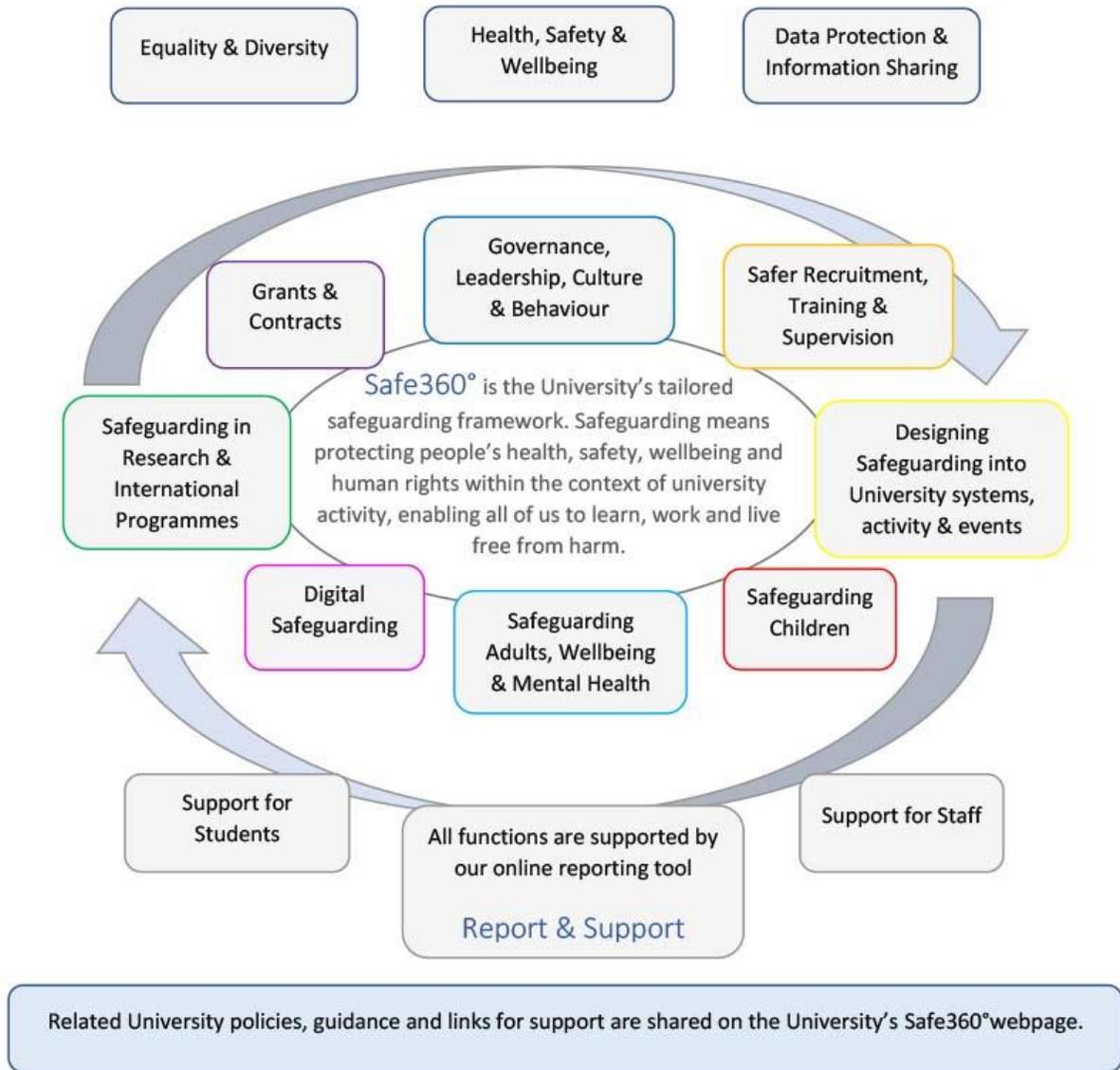
<https://www.ceop.police.uk/safety-centre/>

**Take It Down:** Support for removing intimate images online for under-18s

<https://takeitdown.ncmec.org/>

**Keeping Children Safe in Scotland: Guides for Younger Children, Young People and Parents and Carers, Scottish Government:** A series of guides to provide information, presented in separate sections, about keeping younger children and young people safe in Scotland: [childprotection-resource-scotland.co.uk](http://childprotection-resource-scotland.co.uk) | [Guides for younger children, young people and parents and carers](#)

## Appendix 2: The Safe 360°™ Framework and related University policies, procedures and functions



[Admissions Policy](#)

[Data Protection Policy](#)

[Dignity and Respect Policy](#)

[Equality, Diversity and Inclusion Policy](#)

[Gender-Based Violence Policy](#)

[Grievance Procedure \(Staff\)](#)

[Guidance on Use of Social Media \(staff\)](#)

[Policy and Procedures on Fitness to Practise](#)

[Policy on Children Accessing University of Strathclyde provided IT Systems](#)

[Procedure for Managing Students with Criminal Proceedings](#)

[Protecting Vulnerable Groups and Disclosure Policy](#)

[Public Interest Disclosure \(Whistleblowing\) Policy and Procedures](#)

[Staff Disciplinary Procedure](#)

[Staff Personal Relationships Policy](#)

[Strathclyde Community Commitment](#)

[Strathclyde Corporate Parenting Plan](#)

[Student Discipline Procedure \(Non-Academic Misconduct\)](#)

[Student Guidance on the Use of Social Media and Virtual Learning Environments](#)

[Supervisory Agreement for Postgraduate Researchers and their Supervisors](#)

The [Public Interest Disclosure \(Whistleblowing\) Policy and Procedures](#)