Safe360°™ Safeguarding Policy
Policy

Contents

Policy Owner: University Compliance Officer

Last Review Date: January 2025

1. 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.

We recognise that harmful behaviours can have complex and far-reaching impacts and may result in further enhanced risks of harm, such as significant and negative impacts on mental health. The potential for harm can arise in many contexts, including online environments.

Safeguarding describes a set of measures and approaches to reducing the potential for harm to occur and responding appropriately to issues of abuse or neglect.

The University has legal responsibilities as a Higher Education Institution and a charity to ensure that appropriate safeguarding measures are in place to protect:

- Children and young people under 18 years of age
- Adults at Risk

The University's role in building safer communities, however, extends beyond these statutory obligations. The safeguarding task is relevant to the protection of all members of the University community, and anyone associated with the University, including staff, students and any other individuals while engaging with the University such as visitors, contractors and applicants.

2. Governance

The Safeguarding Committee, a University Committee of Executive Team, provides governance, accountability and oversight of all safeguarding activities across the University relating to staff, students and visitors. The Safeguarding Committee reports to the University Executive Team. 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.

Department or role	Safeguarding role
University Compliance Officer	Designated Safeguarding Lead
University Secretary	Prevent Lead
Safeguarding Team	Ensuring that University policies, procedures and systems support the University's safeguarding task.
	Provide advice and support to staff and student dealing with any matter relating to safeguarding.
	Advice and support to staff affected by a safeguarding concern.
	Ensure responses to safeguarding concerns are appropriate and timely.
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 Strathclyder.
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 progressing our safeguarding commitment, we aim to:

Deliver and comply with our legal obligations to children, young people and adults as a University and a Charity.

Recognise the potential for harm, and the escalated risk that may present for vulnerable individuals and young people. We recognise that by virtue of their circumstances, some staff and students may be vulnerable to harm but not meet the statutory definition of an 'adult at risk'. We further recognise the rights of individuals associated with the University to privacy and due process.

Reduce the potential for harm through appropriate training, awareness raising, culture change and risk management.

Facilitate the raising of concerns by providing the means for staff, students and others to raise concerns.

Respond appropriately and proportionately to concerns through offering support, engaging University policies and procedures, and onward referral to specialist agencies and the police where appropriate.

Review our safeguarding activity on a regular basis and in response to critical incidents in a process of continuous improvement.

Our Safeguarding task is part of our wider commitment to a safe and respectful environment.

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.

Staff and students of the University are expected to abide by the Dignity and Respect Policy, the Strathclyde Community Commitment and relevant discipline procedures. Those policies identify where and under what considerations conduct outside of the University context – for example on personal social media accounts or in face-to-face social contexts off campus – may nonetheless engage those policies.

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 take into account 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](#)
- [Adult Support and Protection (Scotland) Act 2007](#)
- [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 the Appendix.

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 University's policy and procedures relating to the protection of under 18s is set out in more detail in the [Safe360° Child Safeguarding Policy and Child Protection Procedure](#). 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.

6.3 Adults at Risk

For the purposes of this policy, an 'adult at risk' is a person who meets the definition of an 'adult at risk' under the Adult Support and Protection (Scotland) Act 2007. This means a person who meets *all three* requirements set out in the Act:

- They are unable to safeguard themselves, their property, rights or other interests; and
- They are at risk of harm; and
- Because they are affected by disability, mental disorder, illness or physical or mental infirmity, they are more vulnerable to being harmed than others who are not so affected.

6.3 Vulnerability and the need for protection

We recognise that not only children, young people and adults at risk may be vulnerable to harm. Our safeguarding task includes working to reduce the potential for harm and responding to concerns arising from circumstantial vulnerabilities. Circumstantial vulnerability may arise from factors such as power imbalances in the workplace or in teaching and learning, social exclusion, disadvantage related to protected characteristics, and poor mental or physical health. The provisions of this policy extend to all members of the University community unless otherwise stated.

7. Recognising the potential for harm

Within a large community of students, staff, and others associated with the University (including visitors to the campus), individuals may be at risk of harm or may cause harm. Such harm may originate within the University context, or members of the University community may be impacted by harm arising in other contexts. As a host to visitors, partners and contractors, the University is also aware of the need to ensure that we do not facilitate others to do harm and to report safeguarding concerns that come to our attention but originate outside of our context.

Examples of types of harm that are covered by this policy:

- Physical abuse or assault
- Sexual abuse or assault
- Emotional abuse

- Neglect
- Financial abuse or exploitation
- Criminal exploitation
- Trafficking and modern slavery
- Radicalisation
- Bullying, Harassment and Stalking

8.   Reducing harm

8.1 Risk management and preventable harm

Safeguarding forms an integral part of the University's approach to risk management under the [Risk Management Framework](). Safeguarding should be incorporated in risk assessments undertaken for any University activity. Particular consideration should be given to safeguarding arrangements where any of the following apply:

- Activities involving children or young people or that may involve 'adults at risk';
- Lone working;
- One to one interaction between staff/students/others, especially where one party may be vulnerable, whether they meet the definition of an adult at risk, or not;
- Activities that may provide opportunities for exploitation, manipulation or other forms of abuse, for example where parties to an activity share sensitive personal information, or are very dependent on another party for their safety, financial stability or career outcomes;
- Off campus travel, field trips and research.

Further guidance on safeguarding and risk management is available on the [Risk and Resilience Sharepoint Site]().

8.2 Safer 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.

8.3 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. This includes study abroad and student exchange partners and work placement providers. 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.

8.4 Admission and continued registration of students

The University reserves the right to refuse to admit or allow continued participation of a child or 'adult at risk' to a programme or course of study, or other university managed activities, if it judges that any adaptations necessary to safeguard that individual's wellbeing go beyond what is possible, reasonable or proportionate.

9.   Reporting concerns and incidents

Staff should understand, appropriate to their role, issues that may constitute a safeguarding concern. Further guidance is available on the University of Strathclyde Safe360° web pages.

If a concern relates to a person in immediate danger, call Security Services on 0141 548 3333 (if the person is on campus) or Emergency Services (999).

Staff who are concerned about a potential safeguarding issue affecting themselves or others can raise a concern using Report and Support. If the concern relates to a colleague or a student, they may wish to discuss with their line manager first.

Students who are concerned about safeguarding issues may report that concern using Report and Support or seek advice from Student Experience Directorate or the Strath Union Advice Hub.

Line managers and staff who identify a concern relating to a student should use Report and Support to register that concern or encourage the student to do so themselves.

9.1 Report and Support

Staff, students and members of the public may use Report and Support to raise concerns about a safeguarding, wellbeing or related issue, regardless of whether they have sought advice and support before making a report. Reports may be submitted on behalf of others, or anonymously.

Reports submitted to Report and Support do not constitute a formal complaint: the Report and Support system is intended to facilitate the raising of a concern. Reports are assessed by the Student Conduct and Support Team. Cases requiring further consideration or follow up are reviewed and managed by a small group of staff from the Student Conduct and Support Team, Disability and Wellbeing Service, the Safeguarding Team and Security Services, and reports relating to staff conduct will be referred to Human Resources. This group, the Report and Support Response Team, will assess the most appropriate steps to respond to a concern in line with relevant University policies. Their response is guided by the principles outlined in **section 10** below.

9.2 Whistleblowing

We recognise that raising a safeguarding concern may prove difficult if it is associated with professional malpractice or impropriety. A case of apparent malpractice or impropriety may also in and of itself represent a safeguarding risk. The Public Interest Disclosure (Whistleblowing) Policy and Procedures may therefore be applicable in some safeguarding cases and should be consulted where staff are concerned that malpractice or impropriety may hinder the raising of a safeguarding concern.

10. Responding to concerns

10.1 Proportionality, data protection and agency

We will respond to safeguarding concerns proportionately and with due regard to the wishes of a person who may be at risk and the views of a person raising a concern. We will also consider, based on the information and evidence available, the potential of further harm to an individual or to others.

Where there is an apparent immediate risk of serious harm, or the person at risk is a child or 'adult at risk', the University may decide to take necessary action, including contacting the emergency services or external agencies, to mitigate that risk without consulting the person in need of protection or the reporting person.

Information related to a concern or risk is likely to include personal data and may include special category personal data. Personal data relating to safeguarding concerns will be processed in accordance with data protection legislation and in accordance with the University Data Protection Policy.

10.2 Intervention – the application of university policies and procedures

Where a risk or incident of harm arises within the University, we will consider all internal policies and procedures that may be appropriately and proportionately applied and any reasonable steps that may be taken to mitigate the risk of (further) harm.

Where a risk or incident of harm arises outside the University context, but affects a member of our community, the University may be able to offer support. We may also be able to assist the person affected to contact external agencies for further support or appropriate intervention.

If an incident, risk of harm or concern arises relating to the conduct of third parties and contractors engaged with the University, appropriate steps will be taken to raise these concerns with the organisation responsible.

10.3 Referral to external agencies

The nature of a risk or concern may require the University to refer to appropriate external agencies such as Social Work, the Police or other organisations. Where possible and appropriate this will be done in consultation with the person at risk and/or the person raising a concern.

Where there is an apparent immediate risk of serious harm, or the person at risk is a child or 'adult at risk', we may contact emergency services or other statutory agencies without further consultation.

The University will work co-operatively with such external agencies to progress a response to a safeguarding concern, while handling personal information in line with data protection considerations.

10.3.1   Prevent Duty

Where a concern relates to possible radicalisation or involvement in terrorism, it will be considered under the University's Prevent Policy. We recognise that radicalisation represents a safeguarding issue and will, wherever possible, approach such concerns with the aim of supporting the individual at risk.

10.4 Providing support

Where a person at risk is a student, apprentice or member of staff, the University will seek to offer support, either through services provided directly by the University or through supporting the person to access external support.

Further information about sources of support is available on the University of Strathclyde Safe360° web pages.
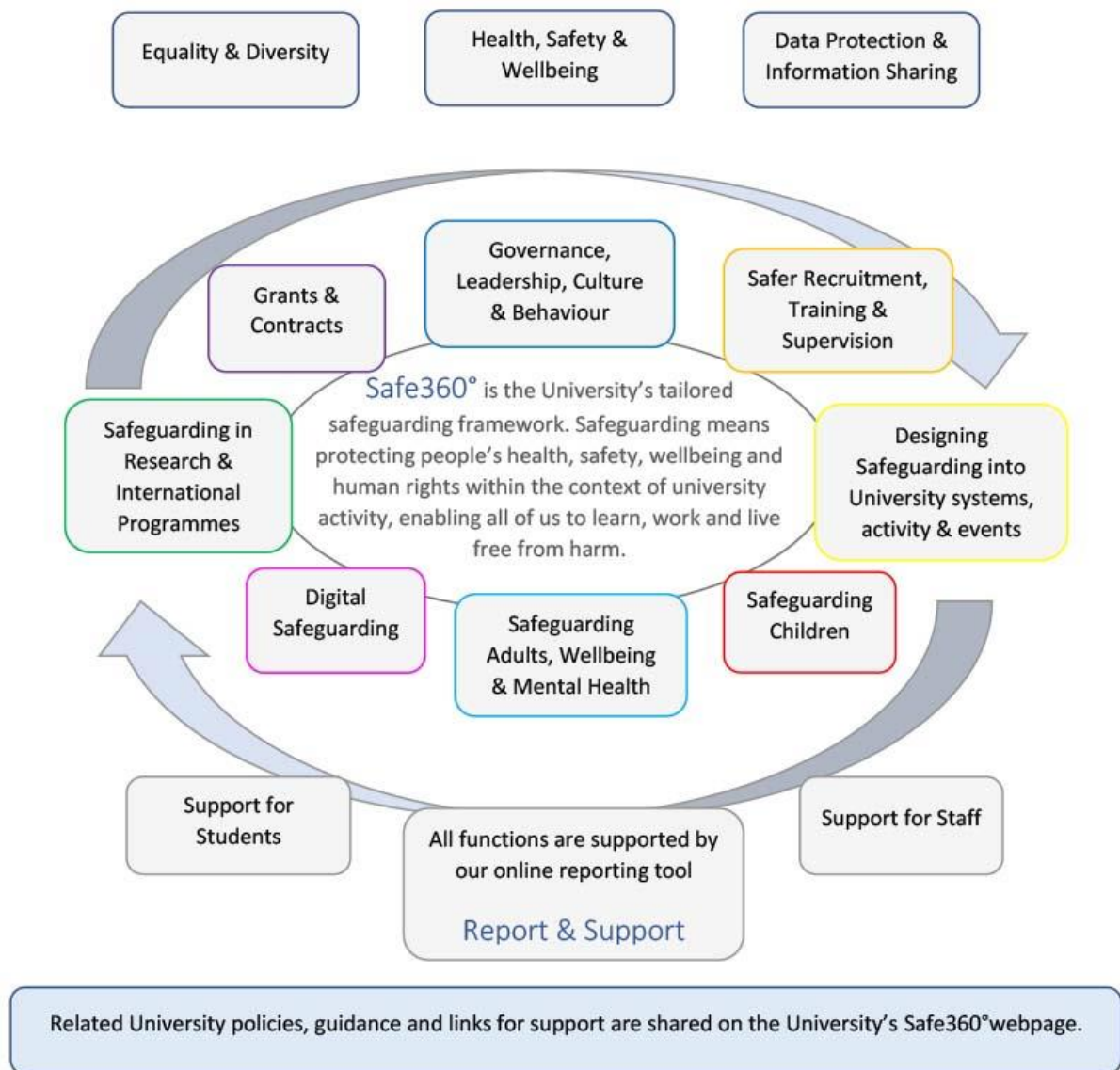
11. Review and Reporting

Safeguarding best practice includes review and reflection on the effectiveness of procedures and policies. This Policy and related procedures and guidance will be reviewed on a regular basis by the Safeguarding Committee. The Safeguarding Committee will also present an annual report to the Executive Team and University Court to support informed governance of the University's safeguarding activity.

The Safeguarding Team will routinely review critical incidents and responses to identify improvements in process, procedures and practice.

12. Further information and resources

Further information, guidance and resources relating to Safeguarding can be accessed on the University of Strathclyde Safe360° web pages.

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

The Safe 360° Framework diagram. Outer boxes: Equality & Diversity; Health, Safety & Wellbeing; Data Protection & Information Sharing. Inner circle components: Governance, Leadership, Culture & Behaviour; Safer Recruitment, Training & Supervision; Grants & Contracts; Safeguarding in Research & International Programmes; Digital Safeguarding; Safeguarding Adults, Wellbeing & Mental Health; Safeguarding Children; Designing Safeguarding into University systems, activity & events. Centre text: Safe360° is the University's tailored safeguarding framework. Safeguarding means protecting people's health, safety, wellbeing and human rights within the context of university activity, enabling all of us to learn, work and live free from harm. Lower boxes: Support for Students; Support for Staff; All functions are supported by our online reporting tool — Report & Support. Bottom: Related University policies, guidance and links for support are shared on the University's Safe360°webpage.

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