

Safeguarding of Children and Vulnerable Adults Procedure

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SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS PROCEDURE

The University is committed to safeguarding the welfare of members of its community. The University takes its responsibilities to students, staff and those who engage with the University seriously and aims to provide a safe and protected environment.

Safeguarding of children and vulnerable adults is the action taken to promote the welfare of children and vulnerable adults and to protect them from harm, abuse and neglect. The University aims to safeguard children and vulnerable adults who come into contact with the University by protecting them from abuse and maltreatment. In relation to children the University aims to prevent harm to children's health or development, ensuring children grow up with the provision of safe and effective care and taking action to enable all children and young people to have the best outcomes.

The University affirms that every child and vulnerable adult, regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, has a right to equal protection from harm, abuse or neglect.

The University has processes in place to ensure compliance with the Protection of Vulnerable Groups (S) Act 2007 and as a charity is responsible to the Office of the Scottish Charity Regulator to have in place policies and procedure to protect vulnerable beneficiaries ([OSCR | Safeguarding Guidance: Keeping vulnerable beneficiaries safe](#)).

This procedure sets out the duties on each person who comes into contact with children or vulnerable adults to protect them from harm whether or not they are required in their role to be a member of the PVG Scheme. This procedure outlines:

- Definitions of children and vulnerable adults
- When might this procedure apply?
- What is harm or abuse of Children or Vulnerable Adults & Positions of Trust
- How to recognise harm or abuse
- What to do if a person discloses harm or abuse to you
- How to report a safeguarding concern to the Safeguarding Officer
- How will a Safeguarding Concern be responded to?

This procedure relating to Children and Vulnerable Adults applies to all staff, students, volunteers, contractors or anyone working on behalf of the University.

Other Relevant Procedures/Guidance/Codes

The following are some of the relevant procedures, guidance, relevant to this procedure.

[Access for Children Procedure](#)

[Provision of Work Experience in UWS Procedure](#)

[UWS Supply Chain Code of Conduct](#)

[UWS Equality, Diversity & Human Rights Code](#)

[IT Acceptable Use Statement](#)

[Procedures for supporting students in distress](#)

Statement

The University will:

- listen to children and vulnerable adults and respect them
- make sure all staff and volunteers understand and follow safeguarding procedures
- ensure children and young people and their families know about safeguarding procedures
- appoint a Lead Safeguarding Officer to be responsible for safeguarding of children and vulnerable adults in the University
- build a safe culture where staff, volunteers, students (including children and vulnerable adults) know how they are expected to behave and feel comfortable about sharing concerns.

Definitions of Children and Vulnerable Adults

Children

A person under the age of 18 is generally recognised as vulnerable and a child for child protection purposes. The Children and Young People (Scotland) Act 2014, and guidance in the National Framework for Child Protection (Scottish Government 2021) confirms that for child protection purposes a child is anyone under the age of 18. This applies even though in Scotland a child gains full legal capacity from age 16.

The University has duties to recruit safely those who undertake regulated work with children and has a process for safe recruitment and membership of the PVG Scheme for both students and staff who carry out regulated work. Although some students may be under 18 or classed as vulnerable, most staff contact with children or vulnerable adults will be incidental to their role and not be regulated work requiring membership of the PVG Scheme.

The University is, in essence, an adult environment and the University does not act in the place of a parent (in loco parentis) for students who are under 18.

Where children visit the University campus the [Access for Children Procedure](#) must be followed and where they attend for work experience the [Provision of Work Experience in UWS Procedure](#) to be followed.

[UWS Supply Chain Code of Conduct](#) details the University's adoption of the principles of the APUC Code of Conduct including the commitment to appoint suppliers that do not use forced, involuntary or child labour.

Vulnerable Adults

A Vulnerable Adult or Adult at Risk is someone who is over 16 years of age and

- is unable to safeguard their own wellbeing, property, rights or other interests; and
- is at risk of harm, and

- because they are affected by a disability, mental disorder, illness or physical or mental infirmity are more vulnerable to being harmed than adults who are not so affected.
(Adult Support and Protection (Scotland) Act 2007)

We acknowledge that no one will be recognised as vulnerable just by virtue of being affected by a disability. If there is any doubt about whether an adult is a vulnerable adult, guidance should be sought from the relevant Safeguarding Officer. The priority is to provide support for the individual.

The University has a duty to recruit safely those who are working with protected adults and has a process for safe recruitment and membership of the PVG Scheme for both students and staff who carry out regulated work.

When might this procedure apply?

The following are some examples of when the University may come into contact with children or vulnerable adults:

- 1) Students who are under 18 when they commence their studies
- 2) Staff who are vulnerable adults
- 3) Widening access or outreach schemes to school pupils
- 4) Children visiting the campuses for events, with family or as part of work experience
- 5) Counselling services
- 6) Student volunteering e.g. at sports clubs
- 7) Students accepted onto relevant undergraduate or postgraduate degrees where placements may involve work with children or vulnerable adults
- 8) Shared use of buildings where children and vulnerable adults may be present in the buildings
- 9) Carrying out research with children or vulnerable adults whether in the UK or overseas.

What is harm or abuse of children or vulnerable adults?

The NSPCC describes the types of abuse which apply to children, ([Definitions and signs of child abuse \(nspcc.org.uk\)](https://www.nspcc.org.uk)). The list set out below is not exhaustive

Neglect	not meeting a child's basic physical and psychological needs e.g. physical neglect, educational neglect, emotional neglect, medical neglect.
Sexual Abuse	When a child is forced or persuaded to take part in sexual activities. This may involve physical contact or non-contact activities and can happen online or offline. Harmful Sexual Behaviour is developmentally inappropriate sexual behaviour

	displayed by children and young people which is harmful or abusive. E.g. Peer-on-peer sexual abuse.
Child Sexual Exploitation	Where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity
Child Trafficking and Modern Slavery	Recruiting, moving, receiving and harbouring children for the purpose of exploitation and is a form of modern slavery
Physical Abuse	Deliberately hurting a child and causing physical harm.
Bullying	When individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable. It can involve people of any age and can happen anywhere, at home or university or online platforms or technologies (cyberbullying).
Online Abuse	Any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phone and other internet-enabled device. This may include Sexting when people share a sexual message and/or naked or semi-naked image, video or text message with another person.
Emotional or Psychological Abuse	The ongoing maltreatment of a child, which can have a severe and persistent negative effect on the child's emotional health and development
County Lines	A form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns.
Domestic Abuse	Any type of controlling, bullying, threatening or violent behaviour between people in a relationship including a child witnessing domestic abuse.
FGM	Female Genital Mutilation is the partial or total removal of the external female genitalia for non-medical reasons.

The Adult Support and Protection (Scotland) Act 2007 describes harm in relation to adults at risk as any harmful conduct an 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); or
- conduct which causes self-harm

The harm can be accidental or intentional, as a result of self-neglect or neglect by a carer or caused by self-harm and/or attempted suicide. Domestic abuse, gender-based violence, forced marriage, human trafficking, stalking, hate crime and “mate crime” (someone pretending to be a friend but takes advantage of the vulnerable adult) will generally also be harm.

Position of Trust

The Sexual Offences (Scotland) Act 2009 makes it an offence for a person who is over 18 and in a position of trust to engage in a sexual activity with a person who is under 18. The legislation provides that anyone who cares for someone who is a student under the age of 18 is in a position of trust. This applies even though the age of consent is 16.

How to recognise harm or abuse?

A child or vulnerable adult may not disclose harm or abuse but the effects may show in their behaviour, such as:

- Unusual or suspicious injuries;
- Neglected or under nourished appearance;
- Dubious or inconsistent explanations for injuries or bruises;
- Becoming withdrawn, socially isolated and increasingly fearful (e.g. demonstration of fear by the person at risk to another person or demonstration of fear of going home);
- A prolonged interval between illness/injury and presentation for medical care;
- Difficulty in speaking with the person at risk (e.g. another individual unreasonably insists on being present);
- Anxious or disturbed behaviour on the part of the person at risk;
- Inappropriate sexual awareness.

What to do if someone discloses harm or abuse to you:

- 1. Show you care and help the person open up.** Be encouraging, be understanding and reassure them that their feelings are important.
- 2. Take time and slow down.** Respect pauses, let the person speak at their own pace.
- 3. Show your understanding and reflect back.** Reflect back to check your understanding
- 4. Inform the person that you do need to pass on the information.**
- 5. Ensure the safety of the person** and report immediately to the police (999) or the local Social Services Department if appropriate.
- 6. Make notes of the conversation.** Include details (name, age, address), what the person said or did that gives cause for concern, any information that has been given to you about any individuals involved.

7. Report their concerns to the relevant Safeguarding Officer for Children and Vulnerable Adults unless it requires urgent intervention and you need to call the police or social services.

How to report a Safeguarding Concern to the Safeguarding Officer

If a child or vulnerable adult reports harm or abuse to you or you are concerned about a child or vulnerable adult you should report the matter to the relevant Safeguarding Officer without delay.

Safeguarding Officers for Children and Vulnerable Adults

Lead Safeguarding Officer: Vice Principal (Governance) & University Secretary

Depute Safeguarding Officers

Students (Scotland): Head of Student Services

Students (England): Dean of London Campus

Staff: Head of Human Resources

Research: Head of Research

If you are working or studying at a partner institution or you are working or have a placement with a partner provider, you should follow the safeguarding procedures of the partner institution or partner provider. If their procedures are inadequate, you should raise any concerns with the relevant University Safeguarding Officer as set out above.

How will Safeguarding Concerns be responded to?

The University will take seriously any reports of safeguarding concerns. The Safeguarding Officer will consider the concern and where appropriate:

1. Report the concern to the police,
2. Liaise with Social Care Services,
3. Initiate an investigation either under the Disciplinary Procedure for Staff, the Procedure for Student Discipline, the Conduct, Competence and Fitness to Practise Procedure or the Criminal Convictions Procedure, whichever is applicable. This investigation may be delayed until the outcome of a criminal investigation is known,
4. Consider whether the Student Suspension Procedure or suspension procedures set out in the Disciplinary Procedure for Staff should be initiated,
5. Signpost the individual to relevant colleagues or organisations for support,
6. Notify the Office of the Scottish Charity Regulator if the safeguarding concern is deemed to be a notifiable event. An allegation of, or incident of abuse or mistreatment of a vulnerable beneficiary of the charity by a charity trustee, member of staff or someone connected to the charity may be deemed to be a notifiable event.

Research funders may also require to be made aware in the event of a concern being raised that relates to a research project they are funding.

Storing Child Protection and Vulnerable Adults Records

All information relating to any concerns under this procedure will be held in accordance with the [Data Protection Code of Practice](#).

Safeguarding in Research

Staff and students involved in research activity have a role in preventing harm to children and vulnerable adults. Research is carried out in accordance with the University's [Code of Ethics](#) and [Guidance for Ethical Practice in Research and Scholarship](#). As part of Research Services' due diligence processes, potential collaborations with third parties appropriate checks will be carried out on collaborator's approach to safeguarding.

London Campus (England)

In England there is no legislation concerning safeguarding of children and vulnerable adults that is specifically aimed at universities but there is a general principal 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 inter-agency working to safeguard and promote the welfare of children (UK Government. July 2018)).

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.