

# **Safeguarding of Children and Vulnerable Adults Procedure**

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**Procedure Author** – University Solicitor

**Procedure Owner** – Vice Principal (Governance) & University Secretary

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**Changes and Reason for Changes** – Changes to link to Prevent policy, changes to reflect updated disclosure legislation and changes in roles.



## **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 a regulated role. Although some students may be under 18 or classed as vulnerable, most staff contact with children or vulnerable adults will be incidental and would not be a regulated role 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 are carrying out a regulated role.

### **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?

### Children

The NSPCC has categorised the types of abuse children may experience. The list set out below is not exhaustive. For more information see the NSPCC's guidance

[Types of Child Abuse & How to Prevent Them | NSPCC](#)

<b>Physical Abuse</b>	When someone hurts or harms a child on purpose. It can include slapping & punching, kicking, shaking, throwing, poisoning, burning & scalding, biting & scratching, breaking bones and drowning. It also includes making up the symptoms of an illness or causing a child to become unwell.
<b>Neglect</b>	Not meeting a child's basic physical, educational, medical and psychological needs
<b>Sexual Abuse</b>	When a child is forced, tricked or manipulated into sexual activities. This may involve physical contact or non-contact activities and can happen online or offline.
<b>Emotional Abuse</b>	Also known as psychological abuse it is any type of abuse that involves the continual emotional mistreatment of a child. It can involve deliberately trying to scare, humiliate or isolate or ignore a child.
<b>Domestic Abuse</b>	Any type of controlling, bullying, threatening or violent behaviour between people who are or have been in a relationship. It can also happen between adults related to one another. Experiencing domestic abuse is child abuse.
<b>Child Sexual Exploitation</b>	Where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity eg grooming
<b>Child Trafficking and Modern Slavery</b>	Where children are tricked, forced or persuaded to leave their homes and are moved or transported and then are exploited, forced to work or sold. It is a form of modern slavery
<b>Criminal Exploitation &amp; Gangs/County Lines</b>	Where children are coerced and manipulated into committing crimes. This includes county lines which is a police term to describe the moving of drugs from a hub (normally a city) into other markets eg suburban areas/market towns.
<b>Online Abuse</b>	Any type of abuse that happens on the internet. It can happen anywhere online eg social media, texts/messaging apps, emails, online chats, online gaming, livestreaming sites. The abuse may include cyberbullying, grooming, sexting, emotional abuse. Sexual abuse sexual exploitation.
<b>Female Genital Mutilation (FGM)</b>	Female Genital Mutilation is when a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as "female circumcision" or "cutting".
<b>Grooming</b>	is when someone builds a relationship, trust and emotional connection with a child so they can manipulate, exploit and abuse them.
<b>Bullying &amp; Cyberbullying</b>	Intentional behaviour on or offline that hurts someone. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.
<b>Radicalisation</b>	Radicalisation is the process through which a person comes to support or be involved in extremist ideologies.
<b>Non-recent abuse</b>	Sometimes called historical abuse is when an adult was abused as a child.

## Adults

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
- Day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause

**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** by emailing [safeguarding@uws.ac.uk](mailto:safeguarding@uws.ac.uk) 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 without delay. Initial reports should be made to [safeguarding@uws.ac.uk](mailto:safeguarding@uws.ac.uk)

**Safeguarding Officers**

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

**Depute Safeguarding Officers**

**Students (Scotland):** Head of Sport & Wellbeing

**Students (England):** Dean of London Campus

**Staff:** People Engagement Manager

**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 by contacting [safeguarding@uws.ac.uk](mailto:safeguarding@uws.ac.uk).

## How will Safeguarding Concerns be responded to?

The University will take seriously any reports of safeguarding concerns. The Safeguarding Officer will review the concern.

Where the concern relates to the potential of radicalisation the Safeguarding Officer will make an internal referral to the University's Prevent Lead who will review the concern in accordance with the University's The Prevent Duty: Prevent Referral Procedure. A safeguarding approach will be taken to any concerns raised with the aim of supporting any individual at risk.

For all other safeguarding concerns the Safeguarding Officers will consider whether it is appropriate to:

1. Report the concern to the police and/or liaise with Social Care Services,
2. 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,
3. Consider whether the Student Suspension Procedure or suspension procedures set out in the Disciplinary Procedure for Staff should be initiated,
4. Signpost the individual to relevant colleagues or organisations for support,
5. Make a referral to Disclosure Scotland if required,
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 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.