



Safeguarding Policy

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This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents: • Data Protection Policy • Trustee Code of Conduct • Employee Discipline and Capability Policy • Employee Grievance Policy • IT and Social Media Policy • Employee Working from Home Policy • Health, Safety and Wellbeing Policy • Volunteer Policy and Volunteer Agreement • Whistleblowing Policy • Advice Centre Conflicts of Interest Policy and Confidentiality Policy • Complaints Procedure • Equality and Diversity Policy [Equality, Diversity and Inclusion Policy] • Terms and Conditions for payment of Memberships and Event Tickets • Discipline Schedule	

Safeguarding Policy

1. Policy Statement

GCU Students' Association recognises that we have a responsibility to provide a safe environment for those who engage in our work. This Policy represents the commitment of the Students' Association to protect children and adults at risk of harm (formerly known as vulnerable adults) in our activities, regardless of whether our activities take place on or off campus.

This Policy applies to anyone working on behalf of the Students' Association including the trustees, employees, casual workers, agency staff, contractors, volunteers and all members.

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 Students' Association's community with guidance on their responsibilities in relation to safeguarding;
- Describe the procedure that should be followed if they suspect a child or adult at risk of harm is experiencing, or at risk of experiencing harm;
- Promote positive collaborative working with the University and with any external agencies involved.

The Students' Association 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 community adheres to our [Equality, Diversity and Inclusion Policy](#).

2. Definitions

The Office of the Scottish Charity Regulator (OSCR) [Safeguarding Guidance: Keeping vulnerable beneficiaries safe](#) (May 2018) describes that 'safeguarding is the action that an organisation takes to promote the welfare of children and vulnerable adults to protect them from harm including physical, emotional, sexual and financial harm and neglect'.

For the purposes of this policy we are describing 'vulnerable beneficiaries' as:

- A child is anyone under 18 years of age
- A young person is anyone between 16 and 18
- An adult at risk is anyone 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 they are more vulnerable to being harmed than adults who are not so affected.

All three elements of the 'adult at risk' 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.

Registered students on the UK campuses of Glasgow Caledonian University (GCU) are automatically members of GCU Students' Association. Glasgow Caledonian University is a higher education establishment whose target audience is adults. There are a limited number of students who start their programme whilst under the age of 18.

In the course of our normal activities the Students' Association does not regularly or directly involve close contact with children or adults at risk of harm. The Students' Association does not carry out 'Regulated Work' under the Protection of Vulnerable Groups (Scotland) Act 2007.

The Students' Association is part of the university community and GCU students and any visitors should therefore adhere to the [Children on Campus Policy](#). The parents/guardian (or other responsible adult) of any child under the age of 16 is responsible for the behaviour and safety of the child or children in their care at all times and provide close supervision. Children are not allowed in the Computer Lab or Re:Union Bar in the Students' Association Building, particularly when alcohol is being served. Visits by children should be an occasional occurrence rather than being on an ongoing or regular basis.

3. Responsibilities

Safeguarding is the responsibility of everyone in the Students' Association community.

The Students' Association is clear on the standards of conduct expected by those involved in the Students' Association. [Schedule 3](#) (Discipline) outlines the expected behaviour from our members. The [Volunteer Agreement](#) outlines the expectations from our volunteers. The [Trustee Code of Conduct](#) sets out the relevant standards expected by trustees. The Employee Discipline Policy outlines the standards of conduct expected by employees and casual workers.

3.1 Employees and Casual Workers

All employees who come into contact with children and adults at risk of harm are in positions of trust and have a duty of care to act if there is a cause for concern. All employees and casual workers should therefore:

- Participate in appropriate safeguarding training as mandated by the Students' Association.
- Understand what constitutes abuse and how it may be recognised.
- Listen carefully to children and adults at risk of harm and others who may be trying to voice concerns.
- Take action in consultation with the Designated Safeguarding Lead (DSL) where there is cause for concern (noting that acting within the scope of this Policy over-rides the Students' Association's usual obligations under the General Data Protection Regulation).
- At all times, treat others with dignity and respect and work within our Equality, Diversity and Inclusion Policy.

It is not the responsibility of an employee to investigate, make judgements or provide a response on safeguarding matters, rather it is important to follow the Reporting Procedure if they believe there is cause for concern.

3.2 Volunteers

Safeguarding is also the responsibility of students who have volunteer responsibilities within the Students' Association and will come into contact with children and adults at risk of harm.

The Students' Association strongly encourages volunteers, including affiliated clubs and societies, to work with another organisation, such as a registered charity or school, who can then take supervisory responsibility for children or adults at risk of harm. All volunteers are required to follow the Reporting Procedure within the setting that they encounter the child or adult at risk of harm, if they believe there is cause for concern.

For an activity that the Students' Association, including affiliated clubs and societies, has direct supervisory responsibility for children or adults at risk of harm then a specific risk assessment should be written and approved by the Chief Executive (or nominee) in advance of the activity taking place. A risk assessment will not normally be prepared for activities for a young person between 16 and 18 years old.

The risk assessment should include:

1. Clear arrangements for supervision of the children or adults at risk of harm during the activity, which set out the roles and responsibilities of Students' Association employees or volunteers.
2. Identification of any problems which are likely to occur during the activity, the steps which will be taken to reduce the risk of these occurring, and who is responsible for each action.
3. An emergency plan including the contact details of first aiders, the University security service, the local police service and any other relevant services.
4. Any other relevant safeguarding arrangements.

4. Prevention

The Students' Association is committed to the protection of children and adults at risk of harm. As such, the following steps have been taken:

4.1 Recruitment

The Students' Association has taken all reasonable and appropriate measures to ensure that unsuitable people are prevented from working with children and adults at risk of harm. The Students' Association does not undertake regulated work and therefore employees and volunteers will not automatically be required to undergo a criminal record check from Disclosure Scotland. A Basic Disclosure Check will be undertaken depending on the nature of the paid or unpaid role.

Where an individual has substantial contact (ie regular and close contact) with children or adults at risk of harm and where the Students' Association, including our affiliated club or societies, would take a supervisory responsibility for these children or adults at risk of harm then a criminal record check would be completed.

4.2 Training

The Students' Association has taken steps to ensure that all trustees and employees 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 Students' Association encourages all trustees, employees and members to respond promptly to any concerns regarding potential harm, as covered under this Policy. The Students' Association will investigate and where any individual is involved in the work of the Students' Association is found to have committed any act of abuse or harm or similar unacceptable conduct towards a child or adults at risk of harm will be subject to disciplinary action in line with the relevant policy. In addition, that person may also be subject to criminal proceedings.

The Students' Association is part of the university community and where possible the Students' Association and Glasgow Caledonian University will work together to ensure a consistent approach to the protection of children and adults at risk of harm.

5.1 Reporting concerns

In the event that a member of the Students' Association community has been informed that abuse of a child or adult at risk of harm is taking place they must report this to Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead within the Students' Association is the Senior Student Adviser.

Examples of when a report should be made include when:

- A child or adult at risk of harm discloses abuse;
- A person makes an allegation of abuse about an individual involved in the work of the Students' Association;
- There are suspicions or indicators that a child or an adult at risk of harm is being abused; for example, where there are observable changes in a child or adult at risk of harm's behaviour that may be related to abuse; or
- The behaviour of any person towards a child or adult at risk of harm causes concern or there is suspicion that a child or adult at risk of harm is being harmed;
- A person makes a disclosure or demonstrates signs that they or someone within the university community are vulnerable.

If a trustee, employee, volunteer or member is unsure of whether a matter should be reported, it is their responsibility to discuss their concerns the Designated Safeguarding Lead.

The Designated Safeguarding Lead will discuss with the individual who is raising the concern that it may be appropriate for the concern to be dealt with under the Safeguarding Policy for Glasgow Caledonian University or the safeguarding procedures for another external organisation (e.g. charity or school where the volunteering takes place).

However, if for any reason these prove to be ineffective, the Students' Association's reporting procedure should be followed.

5.2 Safeguarding Roles

5.2.1 Designated Safeguarding Lead

The role of the Designated Safeguarding Lead is to:

- Undertake appropriate safeguarding training as mandated by the Students' Association.
- Offer an initial point of contact, should any individual involved in the work of the Students' Association have any concerns relating to safeguarding.
- Maintain an up-to-date knowledge of safeguarding.
- Liaise with the Chief Executive to ensure trustees, employees and volunteers meet their responsibilities towards safeguarding as expressed within this policy.
- Liaise with the Chief Executive and then the GCU Safeguarding Team (including sharing relevant information, as deemed necessary), in order to assess and manage risk, and to obtain a fuller picture of the concerns identified and parties involved.

5.2.2 Chief Executive

The role of the Chief Executive is to ensure the Students' Association 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 Chief Executive they or their 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 liaison with Glasgow Caledonian University, accessing the emergency services and liaising with other external agencies such as the Police and Social work;
- Contacting parents or guardian unless this may place the child/adult at risk of harm in future harm;
- Acting as the point of contact for any external agency throughout the investigation;
- Keeping records of complaints or allegations and their outcomes;
- Ensuring the Students' Association meets its reporting requirement to the Office of the Scottish Charity Regulator (OSCR) under the 'Notifiable Events Scheme', by reporting any significant incidents;
- 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.
- Referring the matter to be dealt with under the relevant internal procedure, including but not limited to the Schedule 3 to the Constitution (Discipline), Trustee Code of Conduct or Employee Discipline Policy.

5.3 Confidentiality

Any initial disclosure of suspected harm to a member of the Students' Association community should be treated seriously and with sensitivity. The Students' Association 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.

6. Review and Monitoring

This policy will be reviewed by the Chief Executive, as and when required, taking into account feedback from consultation with employees. This policy does not form part of any employee's contract of employment and can be amended at any time. The Trustee Board will approve any changes to this policy.