Safeguarding Procedure

1. Introduction

1.1 Purpose

1.1.1 This document provides staff with information about safeguarding and duty of care in UHI and all partners. It should be read in conjunction with UHI Shetland's Safeguarding Policy.

1.1.2 Definitions, context and guidance are provided in order that staff can fulfil their responsibilities and work with their local Safeguarding Lead. Guidance is provided about how to report concerns and disclosures. Additional training will be provided to staff to support these procedures.

1.1.3 UHI and all partners operate a system of named Safeguarding Leads, with one in each institution. An up-to-date list of Safeguarding Leads and local Safeguarding Deputies can be found online here.

1.1.4 The Safeguarding Leads and other key staff make up the UHI Safeguarding Group. The group meets twice a year normally, or more regularly when the Safeguarding Policy and/or Procedure require to be updated.

1.1.5 This procedure outlines proportionate and appropriate responses if staff have any concerns about care, welfare and the safety of a student. If staff have any doubts at all as to whether or not it is a safeguarding issue, they should discuss with their designated Safeguarding Lead.

1.2 Definitions

1.2.1 **UHI and partners:** UHI is an integrated university, made up of a distinctive partnership of independent colleges and research institutions. The partners are: UHI Argyll, UHI Inverness, UHI Moray, UHI North Highland, UHI Orkney, UHI Outer Hebrides, UHI Perth, UHI Shetland, UHI West Highland, HTC, Sabhal Mòr Ostaig and Scottish Association for Marine Science (SAMS).

1.2.2 **Safeguarding** is the action we take to promote the welfare of children and vulnerable adults to protect them from harm. This includes making sure we meet our legislative requirements and ensuring the appropriate policies and procedures are put in place. Safeguarding includes child protection but goes further and extends to all vulnerable beneficiaries.

1.2.3 **Duty of Care** is our responsibility to use professional expertise and judgement to protect and promote the best interests of students and staff, and to ensure that we exercise an appropriate level of care towards them, as is reasonable within the parameters of our relationship.

1.2.4 **Vulnerable Adults:** Vulnerable adults or adults at risk are adults who meet all 3 of the below criteria as detailed in the Adult Support and Protection (Scotland) Act 2007:
   - That they are unable to safeguard their own well-being, property, rights or other interests;
   - That they are at risk of harm; and
   - That 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.

1.2.5 **Child / Children:** The term 'child' or 'children' refers to persons who have not yet attained the age of 18 years as stated in section 97(1) of the Children and Young People (Scotland) Act 2014.

1.2.6 **Legal obligations**: We recognise and comply with our legal and statutory obligations that arise from legislation including the Protection of Children (Scotland) Act 2003, the Adult Support and Protection (Scotland) Act 2007, the Counter-Terrorism and Security Act 2015, the Children and Young People (Scotland) Act 2014, National Guidance for Child Protection in Scotland 2021, Prevent and CONTEST, and other relevant guidance and regulations.

1.2.7 **Individual and Corporate Responsibility**: Every member of staff has an individual responsibility to ensure the safety and protection of all students and visitors to UHI Shetland, including children and vulnerable adults. The requirement is for staff to respond proactively and protectively to alleged or actual harm. This is not optional.

Safeguarding involves ensuring the welfare and safety of children and adults at risk, as well as our general duty of care towards students and staff, therefore the procedure applies to all students. Contractors, volunteers and other people working for or with UHI Shetland will also be required to operate within the ethos and parameters of the procedure.

UHI Shetland relies on members of staff fulfilling their individual responsibility in order to fulfil its corporate responsibility. UHI Shetland will ensure appropriate systems are in place to facilitate confidential reporting, disclosure and addressing of safeguarding concerns by staff. Senior staff are open to feedback in order to improve the process.

1.2.8 **Corporate parenting**: UHI Shetland has responsibilities as a corporate parent under the Children and Young People (Scotland) Act 2014.

2.   Role Description for Safeguarding Lead

2.1   Overview

2.2.1 UHI and all partners each have a named Safeguarding Lead. The Safeguarding Lead has ultimate responsibility for when to refer out to Police Scotland and other agencies. The

Safeguarding Lead is responsible for providing general updates to senior members of staff about safeguarding in their institution and will inform a senior member of staff about referrals out before (or as soon as practical after) they occur. Safeguarding Leads should note that informing senior members of staff is not a prerequisite of referring out and should not delay an urgent referral.

2.2.2   In some institutions, the Safeguarding Lead may be supported by one or more Safeguarding Deputies. The specific duties of the Safeguarding Lead are set out below, although they may delegate some of these duties to Safeguarding Deputies. In this case, Safeguarding Deputies will be provided with an appropriate role description detailing their duties and responsibilities.

2.2.3   Staff should not undertake the duties of the Safeguarding Lead but should instead engage with their Safeguarding Lead for advice or if they have concerns.

2.2   Safeguarding Lead Responsibilities

2.2.1   General Responsibilities:
- Be the first point of contact for safeguarding concerns and advice, including Gender Based Violence
- Participate in the UHI Safeguarding Group
- Work with local Safeguarding Officers/Deputies/Contacts, who may be the first point of contact if the Safeguarding Lead is not available
- Be safeguarding champions, keeping the profile of safeguarding high and raising awareness to staff on related themes e.g. hate crime, e-safety, gender based violence (GBV)
- Provide/facilitate training for all new staff and update existing staff on confidentiality, roles, responsibilities and procedures to be followed in any causes for concern.
- Attend training as needed.
- Coordinating necessary risk assessments
- Main point of contact for contractor safeguarding protocols
- Keep secure records of all safeguarding issues, risk plans, concerns raised - as part of wider UHI approaches and for planning and training purposes as we move forward

2.2.2   Managing Concerns
- Collate information regarding any concerns raised.
- Liaise with Senior Management Team about procedures to follow in concerns raised.
- Coordinate investigation and make decisions about which incidents should be reported to external partners or internally investigated.
- Ensure correct documentation is accurately completed and stored correctly.
- Creation and maintenance of risk plans to follow for students who may have placement experience impacted on by outcome of PVG
- Liaise with colleagues regarding any potential disciplinary procedures arising

2.2.3   External Partner Working and Managing Known Risks
- Work with external agencies as necessary, i.e. third sector, social work teams, Police Scotland, including Offender Management Units and Multi Agency Public Protection Arrangements (MAPPA), liaise with/be part of Child Protection & Adult Protection Committees locally

- Make decisions on offer / acceptance / continuing enrolment of prospective or current students with a known risk - this can be a collective decision within a small local team or wider UHI Safeguarding Group team if requested/required.
- Draft Risk Plans for prospective or current students with a known risk, where the student has accepted an offer / is continuing study.
- Meet all students with a risk plan in place to monitor the effectiveness of the conditions and discuss any issues, support student etc. (meet formally once per semester - more often if appropriate)
- Act and guide staff on students with a known risk (and UHI Shetland risk plan) regarding any course or mandatory placements.

3. Reporting and Escalation

3.1. Overview

3.1.1 If a student who is a child or vulnerable adult makes a disclosure you **must** report it. If you have concerns about a student, you should report it using the Safeguarding Reporting Form. If staff have any doubts at all as to whether or not to report an issue, they should discuss it with the Safeguarding Lead.

3.1.2 In general, as a member of staff you should not:
- Make promises you cannot keep.
- Make the person repeat the story unnecessarily
- Delay
- Panic
- Investigate the matter

3.1.3 Should you have cause to report a concern or a disclosure, you should use the Safeguarding Reporting Form. It is important to fill the form out in as much detail as possible, but only fill out the relevant sections.

3.1.4 If you have a concern you wish to discuss with the Safeguarding Lead, you can do so face-to-face. A Safeguarding Reporting Form can be filled out after the discussion.

3.1.5 All staff members must fill out Section A of the form. Remember to maintain strict confidentiality and store the form and any information relating to it securely.

3.2. Recognising and reporting a concern for or about a student

3.2.1 If you have concerns for or about a student, you should complete Section B.

3.2.2 Through day-to-day contact with students, staff are well placed to observe outward symptoms of abnormality or change in appearance, behaviour, learning pattern or development. Such symptoms could be due to a wide variety of causes including mental ill-health, bereavement, changes in family circumstances, drug, alcohol or solvent misuse and relationship problems. Sometimes, however, they could be due to harm.

- Concerns regarding the protection of children or adults at risk may arise because:
  o A child or adult at risk discloses that they are being harmed.
  o There are suspicions or indicators that a child or adult at risk could be being harmed.
  o There are observable changes in the behaviour of a child or adult at risk that could relate to harm.

- o The behaviour of a member of staff towards a child or adult at risk causes concern or there is a suspicion that a staff member or volunteer is harming a child or adult at risk.
- Possible signs of harm include:
  - o Bruises and injuries with which the explanation given seems inconsistent.
  - o Possible indicators of neglect, such as inadequate clothing, poor growth, hunger, poor hygiene.
  - o Possible indicators of emotional harm, such as excessive dependence; attention seeking; self-harming.
  - o Possible indicators of sexual harm – physical signs such as bruises, scratches or bite marks; or behavioural signs such as precocity, withdrawal or inappropriate sexual behaviour.

- Other possible signs are:
  - o Withdrawn behaviour.
  - o Agitated or anxious behaviour.
  - o A student being isolated by other students or isolating themselves from fellow students.
  - o Nervousness when approached.
  - o Inappropriate or improper dress.
  - o Appearing unkempt or unwashed.
  - o Being overly anxious to please.
  - o Signs of discomfort or pain.
  - o Frequent absences for admission to hospital.
  - o Atypical incidence of absence from scheduled teaching events.
  - o Uncharacteristic changes in the child or adult at risk's behaviour, attitude and commitment e.g. becoming quiet and withdrawn, or displaying sudden outbursts of temper.
  - o Inappropriate sexual awareness or behaviour.
  - o Fear of particular adults or students – especially those with whom a close relationship would normally be expected.
  - o Children or adults at risk being reluctant to go home.

3.2.3 It is important to note there are often very powerful and persuasive reasons for a victim not to report harm:
- Emotional/psychological factors, and threats made by perpetrators.
- The perpetrator may be powerful, very significant and close to the individual such as a family member or carer.
- The experience of harm may show in changes in behaviour or in the person's appearance as described above.

3.2.4 Changes to behaviour which is atypical of the person is the key. Behaviour which is noted as a significant change in their usual presentation and functioning as an individual should be a cause for concern and further investigation.

3.2.5 You should also use this section if you have concerns about a student that could lead to them harming themselves or others.

3.2.6 When you have completed Section B, you should pass the form to the Safeguarding Lead. Where possible please send it electronically via email.

3.2.7 The police or other third parties may want to speak to you about the concern you have reported. This is normal and you should not be worried if the Safeguarding Lead lets you know someone wishes to talk to you.

3.3. Recognising and reporting a disclosure from a student

3.3.1 If a student has made a disclosure to you, you should complete Section C.

3.3.2 If a child or adult at risk tells you they are being harmed, as a member of staff you should:
- Be honest and transparent with the person making the disclosure in relation to your professional responsibilities. Make it clear that you will have to share information with appropriate others.
- Allow the person to speak without interruption.
- Listen to what the person says and show that you take them seriously.
- Stay calm – do not rush into inappropriate action.
- Reassure the person – confirm that you know it must be difficult to confide.
- Ensure that you clearly understand what has been said so that you can refer the matter to the Safeguarding Lead.
- Keep questions strictly to a minimum. If you must ask questions, use open ended questions i.e. those where more than a yes or no response is required. Make sure that you do not use leading questions or suggest words.
- Record information in the relevant documentation.
- Consult with the Safeguarding Lead ensuring that you communicate all the information accurately.

3.3.3 When you have completed Section C, you should pass the form to the Safeguarding Lead. Where possible please send it electronically via email.

3.3.4 The police or other third parties may want to speak to you about the disclosure you have reported. This is normal and you should not be worried if the Safeguarding Lead lets you know someone wishes to talk to you.

3.4. Recognising and reporting concerns about someone responsible for students

3.4.1 If you have concerns about someone responsible for students (e.g. a member of staff or volunteer), you should complete Section D.

3.4.2 The types of issue that may lead you to making a report could include:
- Hearing someone use inappropriate or suggestive language around students.
- Seeing someone behaving towards students in a way that transgresses professional boundaries.
- Someone telling you something about someone responsible for students that makes you suspicious.

3.4.3 When you have completed Section D, you should pass the form to the Safeguarding Lead. Where possible please send it electronically via email.

3.4.4 If the report concerns a member of staff Human Resources will be involved at an appropriate point.

3.5. What happens next?

3.5.1 When you pass the form to the Safeguarding Lead they will complete Section E. They may contact you with follow-up questions related to the information on the Reporting Form.

3.5.2 The Safeguarding Lead will liaise with you about the issue as and when they can. Some issues may require confidential and extensive discussions with external organisations in order to protect the person who has been harmed.

4 Other Safeguarding and Duty of Care Areas

4.1   Adult students who disclose childhood abuse

4.1.1 Staff in any organisation who work in a supportive capacity with adults may experience disclosures. In an educational setting this would be from our adult students who, perhaps for the first time, feel able to talk about harm they suffered as children. This will be a significant step for the person making the disclosure. These incidents are unlikely to represent a current safeguarding concern, but similar principles apply:

- Allow the person to speak without interruption.
- Listen to what the person says and show that you take them seriously.
- Stay calm – do not rush into inappropriate action.
- Reassure the person – confirm that you know it must be difficult to confide.
- Ensure that you clearly understand what has been said
- Keep questions strictly to a minimum. If you must ask questions, use open ended questions i.e. those where more than a yes/no response is required. Make sure that you do not use leading questions or suggest words.

4.1.2 The adult may wish to make contact with police about the disclosure. Should this be the case, staff may provide support to the student to help them make contact with the police.

4.2   Adults who disclose ongoing abuse or harm

4.2.1 Staff may experience disclosures from adults who are experiencing ongoing abuse or harm. Staff should provide support to the student using the following principles:

- Allow the person to speak without interruption.
- Listen to what the person says and show that you take them seriously.
- Stay calm – do not rush into inappropriate action.
- Reassure the person – confirm that you know it must be difficult to confide.
- Ensure that you clearly understand what has been said
- Keep questions strictly to a minimum. If you must ask questions, use open ended questions i.e. those where more than a yes/no response is required. Make sure that you do not use leading questions or suggest words.

4.2.2 Staff should signpost to relevant external organisations and provide support to the student to access support if necessary. The student may wish to make contact with police about the disclosure. Should this be the case, staff may provide support to the student to help them make contact with the police.

4.2.3 If the disclosure is in relation to gender based violence, staff should refer to the Gender Based Violence Guidance and support the student accordingly.

4.3   Student criminal offence data disclosure

4.3.1 UHI and UHI Shetland recognise the transformative power of education and do not consider criminal convictions and offences or related security measures to be insurmountable barriers to learning. Where possible, we are committed to supporting those with spent and unspent

criminal convictions in our communities as part of their rehabilitation. 4.3.2   We encourage all applicants and students to disclose information about any criminal convictions or police proceedings which may affect their ability to complete key aspects of their programme or placement. This includes personal restrictions or other conditions arising from court orders or parole conditions e.g. travel, contact with others and use of equipment. Please refer to the Student Criminal Offence Data Policy for further information.

4.4   School Students attending UHI Shetland

4.4.1 If a school pupil discloses an issue that that has taken place within UHI Shetland, the Safeguarding Lead will investigate the issue, working collaboratively with the school's child protection officer to support the pupil accordingly.

4.4.2 If a school pupil discloses an issue that that has taken place outwith UHI Shetland, the Safeguarding Lead will liaise with the school's child protection officer in order to facilitate an investigation by the school. The Safeguarding Lead should seek assurance the issue is being dealt with, and if there is any doubt make a referral to the appropriate authority.

4.4.3 If a school pupil due to attend UHI Shetland presents a risk to staff or students, the school should notify UHI Shetland so if necessary, a risk assessment can be carried out and a decision can be made regarding whether the student should be offered a place on the course.

4.4.4 Where teaching staff are required to record the attendance of school pupils who are attending classes, any absenteeism will be reported to the relevant school in order that they can take appropriate action in the interests of safeguarding.

4.5   Nurseries in UHI Shetland

4.5.1 Nurseries and childcare facilities on premises have local procedures and relevant legislation should be followed at all times.

4.6   Prevent and CONTEST

4.6.1 The Prevent strategy is part of the wider counter-terrorism strategy known as CONTEST, it aims to safeguard people from becoming radicalised or supporting terrorism. Prevent addresses all forms of terrorism and includes the radicalisation of others and associated grooming behaviours, thus ensuring our communities and families are not exploited or groomed into following a path of violent extremism

4.6.2 Prevent has three objectives:
1. Tackle the causes of radicalisation and respond to the ideological challenge of terrorism

2. Safeguarding and support those most at risk of radicalisation through early intervention, identifying them and offering support

3. Enable those who have already engaged in terrorism to disengage and rehabilitate

4.6.3 An integral part of Prevent's success is involving people who already have the skill and support to allow them to recognise when someone may be becoming involved in or supporting terrorism, and can help make a decision not to carry on that path, before any crime is committed.

4.6.4 Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda.

4.6.5 Changes or behaviours to be vigilant of include, but are not limited to:

Emotional changes:	Verbal Changes:	Physical/Circumstantial:
- Short tempered - Angry - New found arrogance - Withdrawn - Depressed - Crying	- Fixated on a subject - Closed to new ideas/conversations - Change in language/use of words - Asking inappropriate questions - "Scripted" speech - Saying inappropriate things – a call to action	- Extreme right-wing tattoos - Use of internet - Change of routine - New circle of friends - Absent - Letting themselves go (in terms of appearance)

Indicators that an individual is engaged in a group or ideology includes:
- Spending increased time in the company with of other suspected extremists;
- Changing their style of dress or personal appearance to accord with a group;
- Day to day behaviour becoming increasingly centred around extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of materials or symbols associated with an extremist cause (e.g., the swastika for right winged groups)
- Attempts to recruit others to the group, cause or ideology;
- Communications with others that suggest identification with a group, cause or ideology;

They verbalise their intention to cause harm, use violence or other illegal means including:
- Clearly identifying another group as threatening what they stand for and blaming that group for all social and or political ills;
- Using insulting or derogatory names or labels for another groups;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others;
- Plotting or conspiring with others

A person may be capable if:
- There is a history of violence
- Being criminally versatile and using criminal networks to support extremist groups
- Having occupational skills that can enable acts of terrorism (such as civil engineering; pharmacology; or construction)
- Having technical expertise that can be deployed (e.g., IT Skills, knowledge of chemicals, military training or survival skills)

9/9