Safeguarding Policy

<table>
<thead>
<tr>
<th>Policy reference number</th>
<th>SP007</th>
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<tbody>
<tr>
<td>Title</td>
<td>Safeguarding Policy</td>
</tr>
<tr>
<td>Responsible committee and officer</td>
<td>Assistant Principal Health and Humanities</td>
</tr>
<tr>
<td>Original author:</td>
<td>Single Policy Framework</td>
</tr>
<tr>
<td>Current revision author: (if applicable)</td>
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Approval

<table>
<thead>
<tr>
<th>Version</th>
<th>Date approved</th>
<th>Approving committee</th>
<th>Individuals/groups to be notified (if relevant)</th>
<th>Committee officer signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>March 2019</td>
<td>Board</td>
<td></td>
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<thead>
<tr>
<th>Version</th>
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<th>Author</th>
<th>Purpose/change</th>
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<td>01</td>
<td>Date</td>
<td>Name</td>
<td>Document creation</td>
<td>Date</td>
</tr>
<tr>
<td>Overview</td>
<td>This policy is required to fulfil the safeguarding obligations of the University of the Highlands and Islands and all Academic Partners.</td>
<td></td>
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<tr>
<td>Purpose</td>
<td>The policy will provide a unified approach to safeguarding across the network and ensure parity of student experience.</td>
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<tr>
<td>Scope</td>
<td>The policy applies to the University and all Academic Partners.</td>
<td></td>
<td></td>
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<tr>
<td>Consultation</td>
<td>The policy has been developed by a group of practitioners from the University and Academic Partners to ensure that best practice is reflected in the policy and accompanying procedures.</td>
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<tr>
<td>Implementation and Monitoring</td>
<td>The University and Academic Partners are responsible for ensuring that the policy and procedures are followed in their own organisation.</td>
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<tr>
<td>Risk Implications</td>
<td>This policy will reduce risk for the University and Academic Partners by ensuring that best practice from across the partnership is being shared and followed.</td>
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<tr>
<td>Link with Strategy</td>
<td>This policy supports the University’s commitment to provide a safe and supportive learning environment for all, aligned with the Strategic Theme of “Our Students”, responding to the diversity of our student population by enhancing inclusive practice, and widening access and participation. It also aims to ensure the University discharges its duty of care and meets legislative requirements on safeguarding.</td>
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<tr>
<td>Impact Assessment</td>
<td>Equality Impact Assessment: Completed 09/01/19. No action required. Privacy Impact Assessment:</td>
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</table>
1 Policy Statement

1.1 The policy outlines our commitment to provide a safe and supportive learning environment for all. In addition, the policy sets out strategies to manage known risk (and any potential risk) to ensure all are protected from harm, abuse, neglect or exploitation.

1.2 Lews Castle College UHI recognises and complies 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 and other relevant guidance and regulations.

2 Definitions

2.1 Safeguarding: Involves carrying out our 'Duty of Care' responsibilities in relation to minors, children, adults at risk, students and staff, ensuring the safety and welfare of all. It involves protecting people's health, wellbeing and human rights, thus enabling all to live and study free from harm, abuse, neglect or exploitation. It is fundamental to high quality learning and engagement.

2.2 Duty of Care: 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.

Please read and consider Appendix 1 for further important information and definitions that help partners fulfil their safeguarding duties.

3 Purpose

3.1 Safeguarding, and the emerging agendas connected to safeguarding and duty of care are posing ever increasing challenges and demands in tertiary education. It is a key part of our remit and responsibilities to manage any real (or potential) risk we face, including online, as a learning community.

3.2 Our duty is to provide a safe and supportive learning environment for all users. For example, recent Scottish and UK government legislation has placed new legal duties and obligations on all Colleges and Universities.

3.3 The increasing demands and complexity of these responsibilities make it imperative that the University and all Academic Partners utilise and develop shared expertise, models, systems and processes to meet these challenges going forward.

3.4 The following underpinning principles are shared by the University and all Academic Partners:
3.4.1 We will utilise a system of named staff (Safeguarding Leads) in the University and each Academic Partner with key responsibilities and duties linked to this role.

3.4.2 We are committed to Continuing Professional Development and ongoing safeguarding training, especially for Safeguarding Leads.

3.5 Criminal Convictions

3.5.1 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.

3.5.2 We will offer support and guidance to applicants/students with criminal convictions about course selection and career planning, and advise on the scope for any potential course or placement adjustments.

3.5.3 We have a duty of care to students, staff, visitors and clients to provide a safe and secure environment for all, and will undertake a risk assessment in the event of receiving criminal offence data relating to an applicant/student, to ensure that we do not admit or retain individuals who may pose a significant risk to our community.

3.5.4 We undertake to ensure that, by this policy and related procedures, we operate in consideration of all relevant statutory legislation and professional body requirements.

4 Scope

4.1 This policy applies to the University and all Academic Partners.

4.2 This policy applies throughout University and Academic Partner premises and campuses, including:

- Student accommodation managed by the University or Academic Partners directly
- Sports facilities
- Nurseries operated by the University or Academic Partners
- Any other areas or facilities where University or academic partner activities are carried out

4.3 This policy applies to activities undertaken by all students as part of their studies, including but not limited to:

- Work placements and work experience
- Summer schools, field trips and outreach activities

4.4 This policy applies in all environments, including physical and virtual (e.g. social media and online learning platforms)
5 Exceptions

5.1 This policy does not apply to accommodation advertised by or signposted to by University or Academic Partners (e.g. privately managed student accommodation or listings of private tenancies)

5.2 Third parties using University or Academic Partner facilities (e.g. Highlands and Islands Student Association, other academic institutes, external sports clubs and societies)

5.3 Students attending activities organised and hosted by another academic institute or body e.g. conferences, symposiums, sports tournaments and society gatherings.

5.4 Safeguarding considerations related to studying abroad, ERASMUS or work placement should be referred to the relevant policy (see Section 9).

6 Notification

6.1 All staff are responsible for safeguarding students through their student journey and will be made aware of any changes to the policy.

6.2 Safeguarding Leads will be briefed and trained on the policy and procedures.

6.3 The policy will be publicly available on Lews Castle College UHI website.

6.4 We will make information available about our Safeguarding Lead and how to contact them. This information will be available both on Lews Castle College UHI website and the University of the Highlands and Islands’ website.

6.5 The regional Student Support Group (SSG) will include any updates to the policy or procedure as an agenda item to ensure that staff group have a forum to discuss changes and best practice.

7 Roles and Responsibilities

7.1 Lews Castle College UHI Board of Management is responsible for approving the policy, ensuring the legal compliance of the policy and ensuring that it is followed.

7.2 The Principal and Senior Management Teams are responsible for operational compliance with the policy set by the Board of Management, and making recommendations to the Board about updates to the policy. The Principal and Senior Management Teams are also responsible for ensuring the operational effectiveness of the policy and making provision for training for all staff.

7.3 Safeguarding Leads – are accountable for responsibilities as detailed in the Safeguarding Procedures.
7.4 Line managers are responsible for ensuring staff participate in training and follow
the policy in their day-to-day role.

7.5 All staff are responsible for familiarising themselves with the policy and
procedures.

8 Legislative Framework

Adults with Incapacity (Scotland) Act 2005
Adult Support and Protection (Scotland) Act 2007
Children and Young People (Scotland) Act 2014
Counter-Terrorism and Security Act 2015
Council of Europe Convention on Action against Trafficking in Human Beings
Data Protection Act 2018
Education (Additional Support for Learning) (Scotland) Act 2004
Equalities Act 2010
EU Directive of 5th April 2011 on Preventing and Combating Trafficking in Human
Beings and Protecting its Victims
Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011
General Data Protection Regulation (GDPR) 2018
Human Trafficking & Exploitation (Scotland) Act 2015
Mental Health (Care and Treatment) (Scotland) Act (2003)
Police Act 1997
Police and Fire Reform (Scotland) Act 2012
Protection of Children (Scotland) Act 2003
Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005
Protection of Vulnerable Groups (Scotland) Act 2007
Rehabilitation of Offenders Act 1974
Sexual Offences Act 2003
Sexual Offences (Scotland) Act 2009

9 Related Policies, Procedures, Guidelines and Other Resources

Approved Placement Policy
Complaints Handling Procedures
Fitness to Practice Guidelines
Fitness to Study Guidelines
IT Acceptable Use Policy
Promoting a Positive Learning Environment Policy
Safeguarding Procedures
Student Code of Conduct
Study Abroad Policy and Guidance (forthcoming)
Appendix 1: Definitions

1) **Minor**: Any child under the age of 16. For example, a school pupil studying at college on a school link program.

2) **Child**: A child can be defined differently in different legal contexts. Under the Children and Young People (Scotland) Act 2014, a "child" will be defined for the purposes of all Parts of that Act, as someone who has not attained the age of 18.

   2.1 The individual young person’s circumstances and age will dictate what legal measures can be applied. For example, the Adult Support and Protection (Scotland) Act 2007 can be applied to over-16s where the criteria are met.

   2.2 Where a young person between the age of 16 and 18 requires protection, services will need to consider which legislation or policy, if any, can be applied. This will depend on the young person's individual circumstances as well as on the particular legislation or policy framework. On commencement of the Children and Young People (Scotland) Act 2014, similar to child protection interventions, all adult protection interventions for 16 and 17 year olds will be managed through the statutory single Child's Plan.

   2.3 The Children's Hearings (Scotland) Act 2011 now contains the current provisions relating to the operation of the Children's Hearings system and child protection orders. Section 199 states that, for the purposes of this Act, a child means a person under 16 years of age.

   2.4 Additionally, children who turn 16 during the period between when they are referred to the Children's Reporter and a decision being taken in respect of the referral, are also regarded as "children" under the Act. Children who are subject to compulsory measures of supervision under the Act on or after their 16th birthday are also treated as children until they reach the age of 18.

   2.5 The United Nations Convention on the Rights of the Child applies to anyone under the age of 18.

3) **Child Protection**: Child Protection is a part of the overall area of safeguarding and refers to the activities undertaken to protect specific children who are being harmed or are at risk of suffering harm.

4) **Adult at Risk**: Someone who is aged 16 or over and who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

5) **Vulnerable Adult**: Vulnerable Adult is the term that was previously used to refer to someone we would most often now refer to as an Adult at Risk.

6) **Harm**: Harm is most broadly defined as being all harmful conduct, but more specifically is:

   - conduct which causes physical, psychological or self-harm or unlawful conduct which appropriates or adversely affects property, rights or interests.

7) **Abuse**: A broad definition of abuse is: all forms of physical and/or emotional ill treatment, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to health, survival, development or dignity in the context of a relationship of responsibility, trust or power.
8) **Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation.

9) **Exploitation:** Includes the exploitation or the prostitution of others, or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

10) **Corporate Parenting:** Is a legal duty placed on all Colleges and Universities in relation to those applicants and learners from 'care experienced backgrounds'. It involves a number of key duties and obligations.

11) **Prevent:** All Colleges and Universities have to fulfil new obligations under the Counter Terrorism and Security Act 2015: to have due regard to the need to prevent learners from being drawn into terrorism.

12) **Hate Crime:** is associated directly with protected personal characteristics, (Also see e-safety)

12.1 The Scottish Government defines hate crime as: "Crime committed against a person or property that is motivated by malice or ill-will towards an identifiable social group". In other words, a hate crime is a crime against someone because of who they are.

12.2 Characteristics covered by Scots law include race, religion, sexual orientation, transgender identity, and disability. Hate crime legislation does not cover crimes against someone because of their gender, although other Laws may apply based on the crime.

12.3 Some colleges and universities have become Third Party Reporting Organisations for hate crime. They have committed to report any form of hate crime and to work with local Police and partners to encourage a tolerant and diverse learning community. This definition also applies to activities online and also to hate speech.

13) **Care Experienced Children and Young People:** Any child or young person who has experienced living in foster care, residential accommodation, living at home but under a supervision order, those in kinship care, or living in a secure unit. New changes in legislation give Young people some choice in where they stay after they turn 16.

14) **E-safety:** E-safety is the safeguarding of vulnerable people online (and includes some or all of the following: bullying, stalking, harassment, blackmail, fraud, abuse, hate crime)

14.1 The dangers associated with being online are huge: but here are some of the main risks and most common issues. Some of the risks and dangers are exclusively related to being online, but for some issues the dangers can happen off-line as well (in the real world). Some dangers can apply to both realms and in some cases can happen in both simultaneously.

14.2 Bullying, harassment, grooming or stalking, are examples of inappropriate behaviour that can happen both online and in the real world or can take place in both realms simultaneously.
14.3 Safeguarding for issues that happen online is becoming increasingly important, especially for sexually motivated activities like grooming, or sexting; which in turn can include blackmail or fraud. Blackmail and Identity Fraud are also examples of online crimes that are increasingly committed using others personal details or accounts online.

14.4 Safeguarding includes ensuring learners are aware of the dangers online and know how to protect themselves online and how to report an issue or concern. New legislation connected to Prevent have placed a duty on Universities and Colleges around e-safety – as part of our duty to prevent vulnerable students being radicalised and being drawn into extremism.

15) Sexting: is when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message.

16) Grooming: is when someone builds an online relationship with a young person and tricks them or forces them to do something sexual. It might include trying to meet up with the young person. People who do this often lie about who they really are.

17) Forced marriage: A forced marriage is one where people are made to get married against their will. It may also involve physical or emotional abuse. This is not arranged marriage – which is consented to by both parties.

18) Blackmail: The crime of threatening to reveal embarrassing, disgraceful or damaging facts (or rumours) about a person to the public, family, spouse or associates unless paid off to not carry out the threat. It is one form of extortion (which may include other threats such as physical harm or damage to property). Online blackmail can be connected to the posting or sending of compromising photos, videos or details.

19) Identity fraud: Is the act of deliberately using a stolen or fictitious identity to make applications for new products or services or to open a new account. Facility takeover fraud, or account takeover fraud, is when a fraudster has enough details (like passwords) to bypass security on your existing accounts and take them over.

20) Female genital mutilation: (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or Sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence.

21) Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
23) **Slavery**: A person who is by law deprived of their liberty for life, and becomes the property of another. Slavery and trafficking are often joined together for safeguarding purposes.

24) **Gender Based Violence**

24.1 Describes a spectrum of behaviour that starts with objectification and unwanted comments and includes: intimidation, harassment, online abuse, intimate image sharing, domestic abuse, physical and emotional abuse, stalking, sexual assault and murder. The term also includes commercial sexual exploitation and so-called 'honour based' violence, including female genital mutilation, forced marriages and 'honour' crimes.

24.2 Scotland uses the term gender based violence because women and girls are much more likely to experience it and men most likely to perpetrate it as a result of the continued inequality in our society. However, the term recognises that men and the LGBT+ community can be victims too.
University of the Highlands and Islands: Safeguarding Reporting Form

Remember to maintain strict confidentiality and store this form securely.

Section A: Reporter’s Name and Information

<table>
<thead>
<tr>
<th>Your Name</th>
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<tbody>
<tr>
<td>Your Position</td>
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<tr>
<td>Office Location</td>
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<tr>
<td>Phone Number</td>
<td></td>
</tr>
<tr>
<td>Email Address</td>
<td></td>
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</tbody>
</table>

**What is your reason for completing this form? Select one option below.**

- [ ] Concerns about a student  
  - [ ] Now complete Section B
- [ ]Disclosure from a student
  - [ ] Now complete Section C
- [ ] Concerns about someone responsible for students
  - [ ] Now complete Section D

Section B: Concerns for or about a student

<table>
<thead>
<tr>
<th>Student’s Name</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Student’s Date of Birth</td>
<td></td>
</tr>
<tr>
<td>Student’s ID Number</td>
<td></td>
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<tr>
<td>Student’s Contact Number</td>
<td></td>
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<tr>
<td>Name of School (if applicable)</td>
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</tbody>
</table>

**Is the student a child, a vulnerable adult or neither?**

- [ ] A child
- [ ] A vulnerable adult
- [ ] Neither

**Your Concerns**
(Include as much relevant detail as possible including reasons for concern, name(s) of person(s) involved, dates and times, any discussion that has taken place.)

Please now pass the form to the Safeguarding Lead
Section C: Disclosure from a student

<table>
<thead>
<tr>
<th>Student’s Name</th>
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<tbody>
<tr>
<td>Student’s Date of Birth</td>
<td></td>
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<tr>
<td>Student’s ID Number</td>
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<tr>
<td>Student’s Contact Number</td>
<td></td>
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<tr>
<td>Name of School (if applicable)</td>
<td></td>
</tr>
<tr>
<td>Is the student a child, a vulnerable adult or neither?</td>
<td></td>
</tr>
<tr>
<td>☐ A child</td>
<td>☐</td>
</tr>
<tr>
<td>☐ A vulnerable adult</td>
<td>☐</td>
</tr>
<tr>
<td>☐ Neither</td>
<td>☐</td>
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</tbody>
</table>

Date and time of disclosure

What did the student tell you?
Record exactly what the student said in their own words and any questions you asked if the situation needed clarified. Continue on separate sheet if necessary.

Provide any additional relevant information.
Examples may include changes in the student’s behaviour, any observations prior to the disclosure etc.

Please now pass the form to the Safeguarding Lead
### Section D: Concerns about someone responsible for students

<table>
<thead>
<tr>
<th>Person of Concern’s Name</th>
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<tbody>
<tr>
<td>Person of Concern’s Position</td>
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</table>

**Your Concerns**  
(Include as much relevant detail as possible including reasons for concern, name(s) of person(s) involved, dates and times, any discussion that has taken place.)

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Please now pass the form to the Safeguarding Lead
## Section E: Safeguarding Lead

<table>
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<th>Safeguarding Lead’s Name</th>
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<tbody>
<tr>
<td><strong>Consultation Undertaken</strong></td>
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<table>
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<tr>
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<td>No further action ☐</td>
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</tr>
<tr>
<td>Continued monitoring ☐</td>
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<tr>
<td>Formal referral ☐</td>
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<tr>
<th>Rationale for Decision</th>
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**Formal Referral Details**
Include details of which agency has been informed, including name and contact number where possible.

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<tr>
<th>Formal Referral Date</th>
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**Senior Management Liaison**
Include details of which member of Senior Management has been made aware of the situation, any discussions that took place and the date the exchanges took place.

<table>
<thead>
<tr>
<th>Safeguarding Lead’s Signature</th>
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| Date of Reporting Form Closure |  |
Lews Castle College UHI: Safeguarding Procedures

1 Introduction

1.1 Purpose

This document provides staff with information about safeguarding and duty of care in the University of the Highlands and Islands and all Academic Partners. It should be read in conjunction with Lews Castle College UHI's Safeguarding Policy.

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.

The University of the Highlands and Islands and Academic 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.

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

These procedures outline 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 Safeguarding is carrying out our 'Duty of Care' responsibilities as an Academic Partner, in relation to minors, children, adults at risk, students and staff, ensuring the safety and welfare of all. It involves protecting people's health, wellbeing and human rights, thus enabling all to live and study free from harm, abuse, neglect or exploitation. It is fundamental to high quality learning and engagement.

1.2.2 Duty of Care: 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.

1.2.3 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 and other relevant guidance and regulations.

1.2.4 Individual and Corporate Responsibility: Every member of staff has an individual responsibility to ensure the safety and protection of all students and visitors to Lews Castle College UHI including children and adults at risk of harm. 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 Lews Castle College UHI will also be required to operate within the ethos and parameters of the procedure.
Lews Castle College UHI relies on members of staff fulfilling their individual responsibility in order to fulfil its corporate responsibility. Lews Castle College UHI 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.

Lews Castle College contacts:

The Safeguarding Lead is Sonja Clark Sonja.clark@uhi.ac.uk tel 70425

The Safeguarding Deputy is Morag Maclean Morag.Maclean@uhi.ac.uk tel 70467

2 Role Description for Safeguarding Lead

2.1 Overview

The University and Academic 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.

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 have to be provided with an appropriate role description detailing their duties and responsibilities.

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 University of the Highlands and Islands 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
- 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 University of the Highlands and Islands 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 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 a college 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 in 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:
  - A child or adult at risk discloses that they are being harmed.
  - There are suspicions or indicators that a child or adult at risk could be being harmed.
  - There are observable changes in the behaviour of a child or adult at risk that could relate to harm.
  - 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:
  - Bruises and injuries with which the explanation given seems inconsistent.
  - Possible indicators of neglect, such as inadequate clothing, poor growth, hunger, poor hygiene.
  - Possible indicators of emotional harm, such as excessive dependence; attention seeking; self-harming.
  - 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:
  - Withdrawn behaviour.
  - Agitated or anxious behaviour.
  - A student being isolated by other students or isolating themselves from fellow students.
  - Nervousness when approached.
  - Inappropriate or improper dress.
  - Appearing unkempt or unwashed.
  - Being overly anxious to please.
  - Signs of discomfort or pain.
  - Frequent absences for admission to hospital.
  - Atypical incidence of absence from scheduled teaching events.
  - 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.
  - Inappropriate sexual awareness or behaviour.
  - Fear of particular adults or students – especially those with whom a close relationship would normally be expected.
  - 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

4.4.1 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.

4.4.2 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 Criminal convictions disclosures
Students are not normally required to disclose criminal convictions when making their application to the college or university. However, information may come to light about an individual’s criminal convictions that could lead to a risk assessment being carried out by staff to ensure the safety of other students and staff. Dependent on the result of the risk assessment, an offer of place on the course may be rescinded if the risk cannot be managed.

4.4 School Students attending Lews Castle College UHI

4.4.1 If a school pupil discloses an issue that has taken place within Lews Castle College UHI, the Safeguarding Lead will investigate the issue, keeping the school's Child Protection Officer up-to-date and informed.

4.4.2 If a school pupil discloses an issue that has taken place outwith Lews Castle College UHI, the Safeguarding Lead will liaise with the school’s Child Protection Officer in order to facilitate an investigation by the school. The Safeguarding Lead will have no further involvement unless their help is requested by the school’s Child Protection Officer.

4.4.3 If a school pupil due to attend Lews Castle College UHI presents a risk to staff or students, the school should notify Lews Castle College UHI 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 on Lews Castle College UHI Premises
Nurseries and childcare facilities on premises have local procedures that should be consulted and followed in liaison with nursery staff.

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.

4.6.2 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.
4.6.3 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.

4.6.4 Changes to look out for fall into three categories – Emotional, Verbal or Physical/Circumstantial.

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

5 Local Arrangements – Comhairle nan Eilean Siar

5.1 Child Protection Committee

The College recognises the statutory responsibility of the Education and Children Services, Comhairle nan Eilean Siar, to ensure the welfare of children and is committed to working with the local area Child Protection Committee to operate in accordance with their procedures / guidelines as appropriate, and also to share information where appropriate.

5.2 Referrals to Comhairle nan Eilean Siar

5.2.1 When concerns are brought to the attention of the Safeguarding Lead or Deputy, they will be concerned to make a propriate and appropriate response to the circumstances. If there is a level of concern which warrants onward referral, contact will be made with Comhairle nan Eilean Siar (CnES) Education and Children Services Duty Social Work (child) or the Duty Social Worker / Team Leader in the CnES Social and Community Care Department (adult at risk).

5.2.2 If the individual has sustained an injury which requires immediate medical attention, the Safeguarding Lead will inform the Duty Social Worker of the arrangements to obtain assistance. It is important to note that a referral only raises a concern about the possibility of abuse: the agency receiving the referral has to go through a procedure laid down by Outer Hebrides Interagency Child Protection Procedures (2018) or Protecting Vulnerable Adults in Western Isles Procedures and Guidelines (2016).

5.2.3 Where a referral has been made by the Safeguarding Lead from Lews Castle College UHI to CnES Education and Children Services or the Department of Social and Community Services, this will be recorded in writing to them (within 24 hours) together with the name of the contact who took the referral.

5.2.4 A record of all concerns (whether or not it is passed through to CnES Education and Children Services or the Department of Social and Community Services) will be held by the Safeguarding Lead.
6 Annual Review
The policy and procedures will be reviewed on an annual basis by the College Safeguarding Advisory Group. The Group will consist of: Assistant Principal (Health and Humanities), Safeguarding Lead (Sonja Clark) and Safeguarding Deputy (Morag Maclean).

7 Related Documents
Gender Based Violence Guidance
National Guidance for Child Protection in Scotland 2014
Adult Support and Protection (Scotland) 2007
Outer Hebrides Interagency Child Protection Procedures 2018
Protecting Vulnerable Adults in Western Isles Procedures and Guidelines (2016)

Appendix 1: Good Practice Guidelines for LCC Staff
Appendix 2: Procedures in the event of allegations made against members of staff

Lews Castle College contacts:
The Safeguarding Lead is Sonja Clark Sonja.clark@uhi.ac.uk tel 70425
The Safeguarding Deputy is Morag Maclean Morag.Maclean@uhi.ac.uk tel 70467
Appendix 1 Good Practice Guidelines

Staff are advised to follow the good practice guidelines of:

a. Maintaining a safe and appropriate distance with children/young people/vulnerable adults. Where physical contact is inescapable e.g. to demonstrate equipment, staff should be aware of the limits within which such contact should take place and the possibility of misinterpretation of such contact.

b. Never making unnecessary physical contact with a child/young person/vulnerable adult. There may be occasions where an individual needs comfort (which may include physical comfort) and staff should use their discretion to ensure that it is appropriate and not unwarranted or unjustified contact.

c. When it is necessary for staff to do things of a personal nature for children/young people/vulnerable adults, to only carry out these tasks with the full understanding and consent of the individual. If a child/young person/vulnerable adult is dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of clothing, or where there is physical contact, lifting or assisting an individual to carry out personal activities. Make sure you do not do things of a personal nature for a child (or disabled adult) that they can do for themselves.

d. Never using physical force against a child/young person/vulnerable adult, unless it constitutes reasonable restraint to protect him/her another person or yourself. If it is necessary to restrain a participant because they are in immediate danger to themselves or others, then the minimum amount of force should be used for the shortest amount of time. Remain calm and get the support and attention of other staff. The incident should be recorded in writing, with a witness statement (where possible), immediately afterwards.

e. Working as far as possible in an open environment e.g. avoiding private or unobserved situations.

f. There may be occasions when a confidential interview is necessary and in such circumstances, the interview should be conducted with an open door or visual access. Where this is not possible, the member of staff should ensure that there is another adult nearby.

g. Keeping records of any false allegations a student makes against you or other staff. This should include everything from: ‘You’re always picking on me’, to ‘you hit me’, or comments such as ‘don’t touch me’. If possible get another member of staff to witness the allegation. Inform your Head of Department and consult with the designated Safeguarding Lead or Deputy.
h. Never keeping suspicions of inappropriate behaviour or abuse by a colleague, student, or visitor to the college to yourself. Report your concerns to the College Principal in the first instance who will consider what action, including consultation with the Safeguarding Lead or Deputy, is necessary.

i. Discussing any concerns or problems regarding ‘safe working practice’ with children with the designated Safeguarding Lead or Deputy, or Assistant Principal (Health and Humanities).

Additionally staff are advised not to:

j. Spend time alone with a student away from others and outside the normal classroom/tutorial/professional situation. This includes spending time alone with someone in a virtual or on-line environment.

k. Travel alone with a student in a vehicle, however short the journey. Where circumstances require the transportation of a student in a vehicle, another member of staff or a volunteer should also travel in the vehicle. In an emergency situation, eg a medical emergency, where it is essential that a staff member/volunteer transports a student on their own, it is vital that the appropriate Curriculum Manager, or the Safeguarding Lead or Deputy or a member of the College Senior Management Team and the parents/guardians are notified immediately

l. Become friends with students within social networking environments unless the interaction is on the basis of College business

m. Develop friendships with students outwith College organised activities

n. Take a student to their home unless this has been arranged as part of a College activity. If it should arise that a situation demands that a student is taken to a staff member’s home, it should only take place with the full knowledge and consent of the relevant line manager and/or the student’s parents / carer.
Appendix 2

Procedures for Dealing with Allegations Against members of Staff

1 Initial Consideration

1.1 Where an allegation of possible abuse is made against a member of staff, the Line Manager must be informed immediately.

1.2 The Line Manager must firstly refer to the guidance set out in the Safeguarding Policy and Procedures, in particular at section 3.4. The Line Manager should immediately report all complaints to the Principal.

1.3 The Line Manager can seek clarification as to what the allegation is, who was involved, when did it happen and where did the alleged incident occur. An investigation must not be initiated until further guidance is sought.

2 Following a Decision of No Further Action

2.1 If the Line Manager in consultation with the Principal is satisfied that the allegation is without foundation and could not have possibly occurred, s/he should:

- Inform the member of staff of the detail of the allegation and the fact that no further action is to be taken under disciplinary or safeguarding procedures;

- Inform the parents/carers of the young person or vulnerable adult of the allegation and the outcome;

- Be aware that the young person or vulnerable adult might have been abused by someone else;

- Consider appropriate counselling and support for the young person or vulnerable adult;

- Consider how the allegation could affect the relationship between the employee and the child and ensure that the employee is provided with guidance on how to relate to the child in the future.

3 Allegations that Require Further Investigation

3.1 If the College Principal and Line Manager establish that the incident could have occurred a decision should be made as to whether the incident should be investigated under the Outer Hebrides Interagency Child Protection Procedures (2018) or Protecting Vulnerable Adults in Western Isles Procedures and Guidelines (2016) or under the College Disciplinary Procedure.
3.2 Where it is decided that the Outer Hebrides Interagency Child Protection Procedures (2018) or Protecting Vulnerable Adults in Western Isles Procedures and Guidelines (2016) should be followed the welfare of the employee must be considered. A suitable support package should be put in place and contact should be maintained with the employee through the provision of regular updates by the College Principal. It is often the case that child protection investigations, involving a number of different agencies, can be lengthy and continued support must be provided for the employee throughout this time. Such support mechanisms could include professional counselling.

3.3 If the investigation concludes that no further action should be taken under the Outer Hebrides Interagency Child Protection Procedures (2018) or Protecting Vulnerable Adults in Western Isles Procedures and Guidelines (2016) then the employee must be informed immediately, particularly if the allegations are found to be malicious.

3.4 Where it is decided that the disciplinary procedure should be followed the College Principal should invoke the appropriate LCC Disciplinary Procedure.

3.5 It is recognised that external investigations can be prolonged and although the College does not have any direct authority to speed these up there should always be a will to conclude investigations as quickly as possible.

4 Suspension

4.1 When an allegation of abuse is made suspension of the member of staff should not be automatic. All the available evidence must be considered and a risk assessment made by the College Principal and relevant professionals, e.g. Social Work. The risk assessment should consider the following points:

- The nature and seriousness of the allegations that have been made;
- The nature of the work undertaken by the member of staff;
- The extent of any access to children, young persons or adults at risk;
- The extent of supervision available to the employee;
- Risks to other employees.

4.2 The risks must be assessed on the facts available and not on hearsay or rumours.

4.3 If the risks are seen as such that suspension is necessary this should not be viewed as a form of punishment. Any such action should be accompanied with appropriate support and reviewed throughout the investigation.

4.4 If the circumstances change it is open to the College Principal to reconsider the risk assessment along with other relevant professionals.
5 Following Police Investigation

5.1 Where after the police investigation the Principal is advised that no further action is to be taken, or where a prosecution does not result in conviction, the Line Manager and College Principal must decide if the employee presents a risk to a young person or vulnerable adult. At this point it is open to the College to invoke the disciplinary procedures against the employee.

5.2 Where it is decided that the allegation has not been substantiated and there is no reason to pursue the disciplinary procedure the Line Manager and College Principal must consider:

- The return to work of the member of staff if he/she had been redeployed or suspended;
- Arrangements for support and advice for the employee and re-integration into the working environment if he/she had been removed.

5.3 Where the investigation results in the employee being convicted of an offence the Line Manager and College Principal will be required to undertake a risk assessment to consider the following options (see section 6 for details of how the risk assessment should be conducted):

- To allow the employee to continue in their contracted post;
- To allow the employee to continue in employment with the College but in a different post;
- To proceed with internal disciplinary procedures.

5.4 Such decisions must be taken within 5 working days.

6 Disqualified from Working with Children List (DWCL)

6.1 The Protection of Children (Scotland) Act 2003 places an obligation on employers to refer individuals to Scottish Ministers for consideration for inclusion on the DWCL. An organisation will be guilty of an offence if it does not make referrals to the DWCL in the circumstances set out in the Act.

6.2 An organisation has a duty to refer an individual who is or has been working in a child care position if the individual has (whether or not in the course of their work):

- Harmed a child or placed a child at risk of harm and has been dismissed as a consequence;

- Harmed a child or placed a child at risk of harm and the organisation would have dismissed or considered dismissing the individual as a consequence, but for the fact that the individual resigned, retired or was made redundant before the organisation could take action to dismiss them;

- Harmed a child or placed a child at risk of harm and as a consequence was transferred to a position within the organisation which is not a child care position;
• Harmed a child or placed a child at risk of harm and the organisation would have dismissed or considered dismissing the individual as a consequence, but for the fact that the individual was on a fixed term contract which was about to expire or had expired before the organisation could consider dismissal proceedings.

6.3 It is important to note that a referral to the DWCL is additional to management taking all the appropriate steps to notify the police, social work department or any other appropriate professional bodies.

6.4 The Protection of Vulnerable Groups (Scotland) Act 2007 builds on these previous pieces of legislation aimed at safeguarding children and adults at risk. The legislation enables a robust vetting and barring scheme that will safeguard children and adults at risk by keeping people who would harm them out of caring positions. It is an offence for an organisation to permit a person who is barred from working or volunteering with vulnerable groups to undertake such work.

6.5 Through a fair and consistent system, employers such as Lews Castle College UHI can ensure that people who have demonstrated through past behaviour that they pose an unacceptable risk do not gain access to children or protected adults through the workplace or through volunteering.

6.6 Lews Castle College UHI will ensure that all members of its staff and those undertaking work activities such as work experience placements are suitably vetted through Disclosure Scotland prior to commencing employment. This allows for safe recruitment decisions and continued protection for staff, students and service users. The college will deal sensitively but promptly with any person who becomes unsuitable in the course of their employment. All staff are required to be members of the Protection of Vulnerable Groups scheme (PVG) through Disclosure Scotland.

7 Storage of Information

7.1 Any information collated about allegations that transpire to be unfounded should not be kept on the employee’s personnel record. In such cases a report should be prepared by the Line Manager detailing the nature of the complaint, the evidence collected and the outcome. This report should be sent to the College Principal where it will be kept on a confidential file.

7.2 Documentation relating to allegations resulting in disciplinary action should be kept on the employees file in accordance with the timescales set out in the disciplinary procedure.

7.3 Where an employee is convicted of an offence this should be noted on the employee’s personnel file. Information recorded as part of the investigation will be held by the Police or Social Work Department in accordance with legislative requirements.