



## COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

### CSC Safeguarding Policy

The Commonwealth Scholarship Commission (CSC) upholds the highest standards of safeguarding. The CSC is committed proactively to safeguard and promote the welfare of our beneficiaries, and to protect its Commissioners, staff who undertake duties on its behalf and all those with whom the CSC comes into contact. The CSC requires staff, members of the Commission, applicants for and recipients of CSC awards and suppliers to act consistently with its requirements for safeguarding. Scholars are required to sign a form when accepting their award, which details their commitment to adhering to the CSC's Safeguarding Policy. Secretariat staff must also adhere to the Association of Commonwealth Universities' safeguarding policy and are given safeguarding training.

We believe that everyone who comes into contact with the Commission itself and our Scholars/Fellows, regardless of age, gender identity, nationality, disability, sexual orientation or ethnic origin, has the right to be protected from all forms of harm, harassment, abuse, neglect and exploitation and an obligation to not harm others.

The Commission does not tolerate abuse and exploitation and expects that everyone associated with the Commission will maintain an appropriate level of awareness of what is required in terms of behaviour and the reporting of concerns.

The purpose of this policy is to protect everyone coming into contact with the Commonwealth Scholarship Commission. The policy lays out our commitment to building a strong safeguarding culture with a zero tolerance of abuse and exploitation, along with a commitment to maintain effective methods for reporting and responding to issues that arise.

It sets out the responsibilities of all relevant parties in relation to safeguarding and outlines the responsibilities of the Commission itself in achieving this goal. Commissioners when inducted sign to agree they have read, and understand the CSC Safeguarding Policy, All Commissioners receive safeguarding training provided by FCDO.

The policy provides an overall safeguarding framework for the Commission and in addition outlines clearly the relevant routes for reporting and responding to concerns as they apply to Secretariat Staff/ Commissioners and Scholars/Fellows.

#### Definition of Safeguarding

In the UK, safeguarding, in general terms, means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

**Safeguarding** within the Commonwealth Scholarship Commission aligns with this and is specifically defined as:

- Preventing and responding to harm caused by the abuse of power, position and

opportunity within the Commission. This includes sexual exploitation, abuse, harassment or bullying upon both the people the Commission aims to support, and also those who engage with the Commission in any capacity.

- It is therefore our means of protecting all people, and particularly the most vulnerable in our society (such as children and at-risk adults), from harm that may arise from contact with our secretariat staff, associated personnel, commissioners, Scholars/Fellows, or at our activities and events.
- It is the duty of care we extend to all of the above as well as others who come into contact with the Commission and our people.
- This duty of care requires that any partners and contractors acting on our behalf also apply a similar safeguarding duty of care.
- The Commission expects that the academic institutions which host scholars/fellows exercise effective safeguarding systems to provide complete protection throughout the journey of those studying and working within their institutions.

### **Scope of the Policy**

This policy applies to:

- **Secretariat Staff** – employed by the Association of Commonwealth Universities (ACU) to act as the Secretariat for the Commission. The ACU is responsible for managing its staff responsibilities and concerns on safeguarding.
- **British Council Staff** – those employed by the British Council responsible for delivery of activities on behalf of the Commonwealth Scholarship Commission under the MOU between the Commission and the British Council. The British Council is responsible for managing its staff responsibilities and concerns on safeguarding.
- **Commonwealth Scholarship Commissioners** - voluntary public appointees of the Commission which is an executive non-departmental public body sponsored by the Foreign Commonwealth and Development Office.
- **Service Providers/Partners** whilst engaged with work related to the Commonwealth Scholarship Commission.
- **Commonwealth Scholars and Fellows** - Commonwealth citizens who have been awarded a Commonwealth Scholarship or Fellowship registered at a UK organisation.
- **Alumni** – where engaged in work for the Commission.

This policy applies at all times, within and outside work hours and in all settings.

### **Risk**

The CSC's work does not directly involve children or vulnerable adults. Nevertheless, the CSC is alert to the risks involved in all aspects of its operations, and the danger of those in positions of trust and authority abusing those positions.

### **Service Providers and Partners**

The CSC's Secretariat is provided by the Association of Commonwealth Universities (ACU) and some overseas services both pre-award and for Alumni are provided by the British Council. The CSC delivers most of its services and programmes through

partners, including nominating bodies and UK and Commonwealth universities, all of whom sign a Memorandum of Understanding (MOU) with the CSC. The MOU confirms that institutions conduct safeguarding measures as relevant.

The CSC’s selection of partners, as reflected in the MOU, recognises the need for high standards of governance, including safeguarding. Safeguarding issues vary between the CSC’s services, programmes and partners – further information is available specific to each.

## Reporting

### What to report

Anyone who has a complaint or concern relating to a safeguarding issue should report it immediately.

This includes any of the following examples (though is not an exhaustive list):

- Child abuse
- Sexual harassment
- Racial abuse or harassment
- Exploitation, including Sexual exploitation
- Bullying
- Cyberbullying

### How to report a safeguarding concern

This should be done via the relevant safeguarding reporting mechanism.

Who is reporting	Who to contact for specific scenarios	Additional Contact (where relevant)
<b>Applicants</b>	For any safeguarding issue that arises <b>in connection with the nominating organisation</b> the first point of contact should be the relevant organisation’s own channels.	If the complainant does not feel the matter has been dealt with in line with that organisation’s policy and procedure, or feels it would not be appropriate to address the issue with the organisation directly, then they should contact the Commission to raise their concern by notifying the CSC’s Safeguarding Champion ( <a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a> )
	This is also the case, for example, when referring to a University’s or relevant organisation’s reporting <b>channels when a safeguarding concern arises during provision of references and supporting statements.</b>	If the complainant does not feel the matter has been dealt with in line with that organisation’s policy and procedure, or feels it would not be appropriate to address the issue with the organisation directly, then they should contact the Commission to raise their concern by notifying the CSC’s Safeguarding Champion ( <a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a> )

<b>Scholars/Fellows:</b>	For any safeguarding issue that arises <b>within or in connection with the university at which the Scholar/Fellow is studying</b> then the first point of contact should be the relevant university channels. Each university has its own established methods such as phonelines, complaints email addresses, safeguarding officers or safeguarding focal points.	The CSC Safeguarding Champion should also be notified at the same time: ( <a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a> )
	For safeguarding issues that <b>concern contact with other Scholars</b> , the first point of contact should be the Commission Safeguarding Champion ( <a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a> )	
	<p>For safeguarding issues that relate to <b>behaviour by any Commissioner</b>, the first point of contact should be the Chair of the Commonwealth Scholarship Commission (care of <a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a>)</p> <p>For safeguarding issues that relate to <b>behaviour by a Commission appointee including Secretariat and British Council Staff</b> the first point of contact should be the ACU Safeguarding Officer regarding a member of Secretariat staff and the British Council Safeguarding Officer regarding British Council staff.</p> <p>For safeguarding issues that relate to <b>behaviour by the CSC Chair</b> the first point of contact should be the FCDO Safeguarding Officer (<a href="mailto:reportingconcerns@fcdo.gov.uk">reportingconcerns@fcdo.gov.uk</a>)</p>	
<b>Commissioners</b>	Reports of <b>any safeguarding concerns from Commissioners</b> should be made to the Safeguarding Commissioner and the Chair of the Commonwealth Scholarship Commission, notifying the Deputy Chair. If this channel is inappropriate, for example if the	

	<p>complaint relates to that individual then reporting should be made to the FCDO Safeguarding Officer (<a href="mailto:reportingconcerns@fcdo.gov.uk">reportingconcerns@fcdo.gov.uk</a>). Commissioners are appointed by the Secretary of State for Foreign, Commonwealth and Development Affairs and so misconduct would be reported to FCDO.</p>	
<b>Secretariat and British Council Staff</b>	<p>Reports of any safeguarding concerns relating to <b>a member of Secretariat staff, a Scholar or a Commissioner</b> should be made to the CSC Safeguarding Champion (<a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a>) and ACU Safeguarding Officer (see ACU Safeguarding Policy) and the ACU Safeguarding Officer alone if the complaint relates to the CSC Safeguarding Champion. <b>Reports concerning the behaviour of another member of British Council staff</b> should be made to the British Council Safeguarding Officer</p>	
<b>For Host Institutions</b>	<p>Reports of <b>breaches by Scholars/Fellows of their institution's safeguarding policy</b>, and how the case is being handled, should be shared with the CSC Safeguarding Champion (<a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a>)</p>	
<b>For Others (including Alumni)</b>	<p>The relevant reporting route is to the Chair of the Commonwealth Scholarship Commission via the standard reporting e-mail address (<a href="mailto:Csc.safeguarding@cscuk.org.uk">Csc.safeguarding@cscuk.org.uk</a>), but addressed to the Chair.</p>	

The Commonwealth Scholarship Commission will also accept complaints from external sources such as members of the public, partners and official bodies to [csc.safeguarding@cscuk.org.uk](mailto:csc.safeguarding@cscuk.org.uk)

### Responding

Confidentiality will be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times.

If appropriate, the CSC will engage professional assistance to deal with any reported incident. It is unlikely that members of the Commission would have the independence and expertise for an adequate response. CSC would share the recommendations, upholding anonymity, of any investigation with relevant funders, service providers and partners as necessary. In cases involving staff employed by the ACU or the British Council, action may be taken using relevant organisations' procedures, in consultation with their Human Resources departments.

### **Responsibilities of the Commission**

In accordance with the organisation's values and mission, the Commonwealth Scholarship Commission commits to building an effective safeguarding culture by addressing the issue across its work.

We will:

- Ensure all Secretariat Staff, Commissioners Service Providers/Partners and Scholars/fellows have access to, are familiar with, and know their responsibilities in relation to this Safeguarding Policy
- Design, risk assess and undertake all our activities and events in a way that protects people from any risk of harm that may arise from their coming into contact with the Commission.
- Implement stringent safeguarding approaches in our recruitment and appointment procedures
- Appoint a designated senior safeguarding Champion within the Secretariat and a Commissioner at Board level with a lead safeguarding role in order to exercise appropriate risk assessment, governance and accountability in this area.
- Ensure Secretariat Staff and Commissioners receive safeguarding training at a level commensurate with their role in the organisation
- Ensure that safe, appropriate, and accessible means of reporting safeguarding concerns are made available to those who come into contact with the Commission.
- Follow up on reports of safeguarding concerns promptly and respond according to due process, policy and procedure, and legal and statutory obligations
- Ensure that scholars/fellows are provided with, understand and agree to abide by, the requirements and standards of the safeguarding policy and Scholar code of conduct

In carrying out these responsibilities the following should also be noted:

- The Commission is not responsible for the safeguarding arrangements within those institutions which host Scholars/Fellows. The duty of care rests with the hosting university or institution. This includes the host's responsibility to conduct risk assessments and training in professional ethical codes in advance of fieldwork which is to be undertaken by Scholars/Fellows.
- The Commission is responsible for ensuring that Scholars/Fellows are made aware that the universities have their own safeguarding responsibilities, reporting systems and support. It is the Scholars/Fellows responsibility to familiarise themselves with the appropriate procedures at their host university or institution.
- The Commission will exercise appropriate duty of care in ensuring that such systems have been observed in relation to its Scholars and Fellows.
- The Commission will apply appropriate disciplinary measures to anyone found in breach of policy. The CSC Disciplinary Policy and Procedure must be adhered

- to if potential misconduct by a Scholar or Fellow has been reported.
- The Commission will offer advice and support to survivors of harm caused by any of its representatives

### **Safeguarding responsibilities of Secretariat staff, Commissioners, Associated Personnel, Scholars and Fellows**

Everyone associated with the Commonwealth Scholarship Commission is responsible for ensuring the highest standards of behaviour towards others. Commission Secretariat Staff, Commissioners and Associated Personnel, Scholars/Fellows must not cause harm through the abuse of their power, influence, position and opportunity. This includes but is not exclusive to the following areas: the University is to ensure the necessary checks on scholars, such as DBS checked if working with children or vulnerable adults

#### **Child and vulnerable adult safeguarding**

They must not:

- Engage in sexual activity with a vulnerable adult or anyone under the age of 18
- Sexually abuse or exploit children or vulnerable adults
- Subject a child or vulnerable adult to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with vulnerable adults and children including child labour, modern slavery or trafficking
- Put a vulnerable adult or child at physical or health risk by participation in research that is not compliant with professional ethical standards.

#### **Adult/ Vulnerable Adult safeguarding**

They must not:

- Sexually abuse or exploit at risk adults
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities including modern slavery or trafficking
- Put at physical or health risk by participating in research that is not compliant with professional ethical standards and risk assessment

#### **Protection from sexual exploitation and abuse**

They must not:

- Extend assistance and advancement to beneficiaries, scholars/fellows in return for sexual activity
- Engage in any sexual relationship based on inherently unequal power dynamics. This would include for example, those between Secretariat Staff or Commissioners and Scholars/Fellows

#### **Sexual Harassment and Harassment**

They must not:

- Undertake unwanted conduct of a sexual nature that makes another person

- feel intimidated, degraded, humiliated or offended.
- Harass or bully another person causing alarm or distress

**Additionally, they must:**

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Make themselves aware of their own responsibilities within this policy
- Report any concerns or suspicions regarding safeguarding violations according to the appropriate reporting procedures

**Recruiting**

The CSC requires its service providers to always seek references before employing staff and to ensure DBS checks are obtained where appropriate. Commissioners are appointed by the Secretary of State Foreign, Commonwealth and Development Affairs in line with the Public Appointments Commissioner’s Code of Practice.

**Contacts for Reporting**

**CSC Safeguarding Commissioner (Interim)**

Dr Catherine MacKenzie

**CSC Safeguarding Champion**

Deborah Bennett, Head of Programme Management: [csc.safeguarding@cscuk.org.uk](mailto:csc.safeguarding@cscuk.org.uk)

**FCDO Safeguarding Officer**

Special Investigations Team: [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk)

**Associated Policies**

- CSC Award-Holder Code of Conduct
  - CSC Commissioner Code of Conduct
  - CSC Award Holder Disciplinary Policy and Procedure
  - CSC Complaints Policy and Procedure
  - CSC Whistleblowing Policy and Procedure
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## **Glossary of Terms**

### **Cyberbullying**

Cyberbullying is bullying that takes place over digital devices like cell phones, computers, and tablets. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.

### **Harm**

Psychological, physical and any other infringement of an individual's rights

### **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, racial slur, constant criticism, belittling, persistent shaming, solitary confinement and isolation

### **Protection from Sexual Exploitation and Abuse (PSEA)**

The term used to refer to the prevention of sexual exploitation and abuse of beneficiaries by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

### **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **Sexual exploitation**

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

### **Sexual Harassment and Harassment**

Sexual harassment is defined as unwanted conduct of a sexual nature that makes another person feel intimidated, degraded, humiliated or offended

Harassment is defined as behaviour causing another person alarm or distress

### **Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive. However it is the individual's choice how they wish to identify themselves.

### **At - risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.

**A Child** is defined as a person below the age of 18

## Social media

The following outlines the types of content that must not be published or associated with the Commission or Scholarships. Anything that may be seen as abusive, obscene, indecent, or offensive.

This includes:

- Publishing offensive or derogatory content relating to sex, gender, race, nationality, disability, sexual orientation, religion/beliefs, age, or any other such protected characteristic
- Publishing content that is insulting, hateful, defamatory, threatening, discriminatory, or pornographic
- Behaving in a bullying, intimidating, or harassing manner towards other users, organisations, or administrators
- Content containing, or alludes to, unlawful material
- Content encouraging anyone to act in contravention of the terms of their award
- Content that constitutes spam or promotes or advertises products that have little relevance to the spirit and purpose of the group

Date of Review	June 2022 (by Chair of ARM)
Date of Next Review	March 2023