

IntoUniversity Safeguarding Policy

for Children, Young People, and Adults at Risk of Abuse, Neglect, or Exploitation

Policy Management

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1. Policy Statement

IntoUniversity is a charity that provides local learning centres where young people are inspired to achieve. We believe that it is unacceptable for anyone to experience abuse of any kind. We recognise our responsibility to safeguard the welfare of all children, young people, and adults, and we are committed to the safe working practices outlined in this policy to achieve this.

1.1 The purpose of this policy:

- To protect the children, young people, and adults who engage with **IntoUniversity** services.
- To provide staff and volunteers, as well as children, young people, and their families, with the principles and practices that guide our approach to safeguarding and child protection.

1.2 Scope of Policy

This policy applies to all **IntoUniversity** employees including non-delivery and temporary staff, as well as volunteers, trustees, and contractors. Safeguarding is everyone's responsibility. The majority of the charity's work takes place with children and young people, less frequently, staff will support students who are adults. For this policy, when referring to students this applies to children, young people, and adults taking part in our Adult and Family Learning and Student Opportunity programmes.

IntoUniversity supports students across England and Scotland, whereby legal definitions of child and adult differ in legislation.

- In the context of the Children Act 1989 (CA 1989) in England, a child means a person under the age of 18.
- In the Adult Support and Protection (Scotland) Act 2007, a person is considered an adult at the age of 16 or older. Scotland has a distinctive approach to safeguarding linked to Getting It Right for Every Child (GIRFEC) which promotes action to improve the wellbeing of every child and young person. However, there are specific protective procedures and frameworks for those over the age of 16 designed primarily to enable child and adult services to work effectively to promote, support and safeguard the well-being of young people and adults.

Therefore, references within this policy to children are intended to refer to children and young people up to the age of 18 years.

We recognise that:

- The welfare of the child is paramount, as set out in the Children Act 2004 and the Children (Scotland) Act 1995. This principle applies to all children, regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation. In line with Keeping Children Safe

in Education (2025), we also include socio-economic background and immigration status within this list.

- Some children are additionally vulnerable due to previous experiences, their level of dependency, communication needs, neurodiversity, care experience, or other individual circumstances.
- Working in partnership with children, young people, parents/carers, and other agencies is essential in promoting young people's welfare, and ensuring the best outcomes.
- Adults may also require safeguarding support although this policy will mainly refer to children and young people (the principles of Adult Safeguarding are set out in Appendix E).

We seek to keep students safe by:

- Appointing a dedicated safeguarding team who advise on and respond to concerns nationally.
- Ensuring Safer Recruitment Processes are in place.
- Adopting child-centred safeguarding policies, procedures, and practices and ensuring they are known and followed throughout the organisation.
- Recording and storing information securely in line with our Data Protection Policy.
- Sharing our safeguarding processes with students, their families, staff, and volunteers and ensuring they know how to raise a concern.
- Promoting multi-agency working where concerns are escalated and relevant information shared with appropriate agencies to ensure safety. Students and their families are routinely included in this process.
- Managing allegations and low-level concerns against staff, volunteers, and those in a 'Position of Trust' and involving other agencies when required.
- Ensuring complaints are taken seriously and promoting organisational awareness of our Whistleblowing Policy.
- Providing a comprehensive training package for staff, volunteers, and trustees.

2. Managing Concerns and Disclosures

All concerns and disclosures will be taken seriously and managed appropriately in line with IntoUniversity's safeguarding procedures.

2.1 Procedure when there is a safeguarding concern of a child or young person

Where there is a suspected concern or a direct disclosure of abuse or neglect from a child or young person, IntoUniversity staff and volunteers should follow the below steps:

- If you believe an individual is at imminent risk of harm or there is a threat to life, contact the emergency services on 999 immediately. Notify your Line Manager and the Safeguarding Team you have taken this action as soon as possible, or the same working day.
- If there has been a disclosure, reassure the child, young person or adult that they have

done the right thing in telling you. Ensure the child or young person is aware that we may not be able to keep the information confidential and do not let the child or young person leave our care until the Line Manager or Safeguarding Team has assessed that it is safe to do so.

- Inform your Line Manager as soon as practically possible. The Line Manager will then decide whether the concern can be managed by the centre/programmes team or if the concern should be escalated to the Safeguarding Team.
- To escalate, or if your Line Manager cannot be contacted, call the designated safeguarding phone line which is staffed by the Safeguarding Manager (DSL/DCPL) or a member of the Safeguarding Team (Deputy Designated Safeguarding/Child Protection Lead) during core delivery hours. If you are expecting to deliver programmes outside of the normal delivery hours, you must arrange safeguarding phone cover with the Safeguarding Team before the event.
- The Safeguarding Team member, along with the programme/centre team, will assess the current safety and establish the next steps which may include making a referral to the Local Authority Social Care, contacting parent/carers, and/or informing the school or other services.
- If a referral is made to Social Care, this should be done in communication with the Safeguarding Team and using the relevant local authority guidance. Referrals should always be submitted promptly.
- If the concern is related to a child, it should be shared with their parent/carers, and their consent sought if applicable, unless it would increase the risk of harm to the child or young person. If it has not been possible to gain consent within a reasonable time frame, as assessed by the Safeguarding Team, a referral may be made without the consent of the parent/carer and they should be informed as soon as possible.
- Regardless of whether a referral is made, all observations, relevant information and actions taken should be recorded as soon as possible (always within 24 hours) on Salesforce (**Into**University's database).
- Depending on the seriousness of the concern, the Senior Management Team and/or the Safeguarding Team may also report the case to The Charity Commission or the OSCR Scottish Charity Regulator as appropriate.

It is the responsibility of the Centre Leader/Programme Manager, with the support of the centre team and Safeguarding Team, to ensure all follow-up actions are completed and the child or young person is safe. All follow-up actions and updates must be recorded on Salesforce.

2.2 Procedure when there is a safeguarding concern about an adult or adult at risk

All concerns and disclosures will be taken seriously and managed appropriately in line with **Into**University's safeguarding procedures.

Where there is a suspected concern or a direct disclosure of abuse, neglect, or risk of harm

involving an adult or adult at risk, IntoUniversity staff and volunteers should follow the steps below:

- If you believe an individual is at imminent risk of harm or there is a threat to life, contact the emergency services on 999 immediately. Notify your Line Manager and the Safeguarding Team you have taken this action as soon as possible, or the same working day.
- If there has been a disclosure and there is not an imminent risk of harm, listen carefully and reassure the adult that they have done the right thing in speaking to you. Where appropriate explain that we will not be able to keep the information confidential, especially where there is a risk to others or to themselves.
- Inform your Line Manager as soon as practically possible. Your Line Manager will then decide whether the concern can be managed by the centre/programmes team or if the concern should be escalated to the Safeguarding Team.
- To escalate, or if your Line Manager cannot be contacted, call the designated safeguarding phone line which is staffed by the Safeguarding Manager (DSL/DCPL) or a member of the Safeguarding Team (Deputy Designated Safeguarding/Child Protection Lead) during core delivery hours.
- The Safeguarding Team member, along with the programme/centre team, will assess the concern and agree on next steps. This may include offering signposting to external services, contacting the individual's GP or family (where appropriate), or making a referral to the Local Authority Adult Social Care services.
- Consent should be sought from the adult before making a referral or sharing information. There may be circumstances where consent is not required or appropriate (e.g. if a child is at risk, or the individual lacks capacity, see APPENDIX E)
- If the concern involves the safety of a child, the duty to safeguard the child overrides the adult's confidentiality, and appropriate action must be taken to protect the child.
- Where it is safe and appropriate to do so, the adult should be kept informed of any referrals made or actions taken.
- All observations, relevant information, and actions taken should be recorded as soon as possible (always within 24 hours) on Salesforce (IntoUniversity's database).
- Depending on the seriousness of the concern, the Senior Management Team and/or Safeguarding Team may also report the case to The Charity Commission or the OSCR Scottish Charity Regulator as appropriate.
- It is the responsibility of the Centre Leader/Programme Manager, with support from the centre team and Safeguarding Team, to ensure that all follow-up actions are completed and that the adult or adult at risk is safe. All follow-up actions and updates must be recorded on Salesforce as soon as possible or within 24 hours.

2.3 The Student's Wishes

Where there is a safeguarding concern, **IntoUniversity** staff and volunteers should ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide.

Systems should be in place for the student to express their views and give feedback. However, we recognise that children and young people may not feel ready, know how to tell someone, or may not recognise their experiences as harmful. Staff must therefore act on safeguarding concerns even

where a student is reluctant to share information, ensuring the child's best interests remain the primary consideration.

2.4 Parent/Carer Involvement

IntoUniversity recognises the vital role of parents/carers and guardians when safeguarding children and young people. We aim to include them in safeguarding conversations whenever it is safe and appropriate to do so.

Where possible, consent will be sought from parents/carers before making referrals to Local Authorities or external agencies. However, if seeking consent would place a child or young person at greater risk of harm, or if consent cannot reasonably be obtained, a referral will be made without consent in the best interests of the child. Parents/carers will be informed as soon as it is safe to do so.

2.5 Multi-Agency Working

At **Into**University, we recognise the importance of collaborative working to safeguard children, young people, and adults at risk. Effective partnerships are essential for recognising, assessing, and addressing needs. We are committed to working closely with statutory agencies such as social care, police, health, and schools by sharing relevant information promptly and securely.

In England, Working Together 2025 and KCSIE 2025 emphasise the duty to share information where it is necessary to safeguard a child, even without consent, provided this is in the child's best interests. In Scotland, GIRFEC requires that agencies work together around the child's wellbeing. Multi-agency working is often coordinated by a Named Person or Lead Professional. Staff should liaise with these roles as appropriate.

2.6 Criminal Responsibility

The age of criminal responsibility is 10 in England and 12 in Scotland so children under this age cannot be arrested. No child should be left unsupervised where the suspect is a child or vulnerable person, the Police and Criminal Evidence Act (PACE) requires the presence of an Appropriate Adult for many procedures and this would likely be the parent/carer so we would make every effort to contact them if safe to do so.

3. Supporting Staff and Volunteers

IntoUniversity operates Safer Recruitment procedures that include references, DBS/PVG checks, and a probation period. When Staff, Volunteers, and Trustees are in role they receive Safeguarding Training appropriate to their role. If staff would like to seek support regarding the impact of managing safeguarding concerns, they can speak to their line manager, HR, or the Employee Assistance Programme. See the Staff Handbook for relevant policies, including the Recruitment and

Progression Policy and the Applicants with Criminal Records Policy or speak to the HR team for more information on safer recruitment processes.

4. Allegations against staff and volunteers

IntoUniversity promotes an open and transparent culture in which all concerns about adults working in or on behalf of the organisation (including volunteers, visitors, and contractors) are dealt with promptly and appropriately enabling the organisation to identify concerning, problematic, or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the organisation are clear about professional boundaries, and act in accordance with the ethos and values of the organisation.

4.1 Low-level concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the organisation may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

All low-level concerns regarding adults working in or on behalf of the charity (including staff, volunteers, visitors, contractors and trustees) must be reported as soon as possible - please see the Low-Level Concerns Policy in section 3 of the staff handbook for more information and the reporting procedure.

4.2 Allegations

Keeping Children Safe in Education 2025 states that allegations meeting the harms threshold might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children. They may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour outside of **IntoUniversity** programmes that might make them unsuitable to work with children, also known as transferable risk).

Allegations can be made by anyone including colleagues, volunteers, parents/carers, children/young people, and community/external staff and all should feel safe to express them without fear of victimisation.

4.3 Procedure for allegations against staff and/or volunteers

All allegations of safeguarding misconduct regarding staff must be immediately and confidentially reported directly to a member of the Senior Management Team or Head of People and Culture by phone on [020 7243 0242](tel:02072430242) or email HRinternal@intouniversity.org. The Senior Management Team will manage the investigation and may consult the Safeguarding Team/Trustees if appropriate.

Allegations of safeguarding misconduct against a volunteer should be immediately brought to the attention of your Line Manager and the Volunteer Manager, and the Safeguarding Team. The Volunteer Manager will escalate concerns to a member of the Senior Leadership Team. The Senior Leadership Team will manage the investigation with support from the Senior Management Team and may consult the Safeguarding Team if appropriate.

The following action should be taken in the event of an allegation:

- Make sure that the child or young person is safe and away from the alleged perpetrator.
- If the matter is concerning a staff member, refer this immediately to the Senior Management Team.
- If the matter is regarding a volunteer, refer this immediately to your Line Manager, Volunteer Manager, and Safeguarding Team.
- The appropriate team will advise on the next steps and will lead the investigation. It is the responsibility of the reporting staff member to ensure that the concern has been received and acknowledged by the appropriate member of the SMT/Volunteer Manager in a timely manner.
- If you cannot make contact with a member of the SMT about allegations against staff (e.g annual leave) please contact a member of the Senior Leadership Team or HR team and explain that you have a staff allegation that you need to pass on and they will make contact with a member of the Senior Management Team.
- The Senior Management Team/Volunteer Manager will discuss and consider the need for a referral to the Local Authority.
- The charity may consider it necessary, taking into account the nature of the concern and/or taking into consideration the employee/volunteer's wellbeing, to limit the scope of the employee/volunteer's activities until the matter has been resolved.
- Follow the advice given regarding contact with the parents/carers of the alleged victim if they are a child.
- Consider whether the alleged perpetrator has access to children, young people, or adults at risk elsewhere and if so consider if a referral to the LADO or Scottish Ministers is required.
- **IntoUniversity** will work closely with the Local Authority as well as the police in following procedures.
- **IntoUniversity** will follow any external investigation with an internal review to promote better safeguarding practices.
- **IntoUniversity's** disciplinary procedures may be implemented, irrespective of the action that is taken by social care or the police.
- **IntoUniversity** will keep a record of all low-level concerns, allegations, investigations, and

reviews. Staff conduct will be managed and recorded by **IntoUniversity's** HR team and volunteer conduct should be recorded by the Centre Leader/Programme Manager on the volunteer's Salesforce record.

- In the event of a staff member being in breach of the Safeguarding Policy **IntoUniversity** will follow the disciplinary rules and procedures outlined in the staff handbook.

4.4 Whistleblowing Policy

IntoUniversity has a clear whistleblowing procedure, found in the staff handbook and referenced in staff training, and promotes a culture that enables issues about safeguarding and the welfare of children and young people to be addressed.

5. Information Sharing and Record Keeping

IntoUniversity understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Child Safeguarding Practice Reviews (CSPRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe and we are therefore committed to multi-agency working. Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children and should do so with support and advice from the Safeguarding Team. If you are unsure of when it is appropriate to share information, please speak to the Safeguarding Team. For more details on this topic, read the [Department for Education's 7 Golden Rules for sharing information](#).

All information regarding safeguarding incidents and concerns is stored centrally on **IntoUniversity's** database (Salesforce) and not on individual devices. Safeguarding concerns and disclosures will only be shared in circumstances that will further protect the child from harm and, when safe to do so, with the consent of the child and their parent/carer. When information is being shared, it is done so in a safe and secure way such as via secure email or password-protected databases or documents. If you are unsure of how to share information about a safeguarding case safely, please contact the Safeguarding Team.

6. External Opportunities and Third Party Providers

IntoUniversity may promote external opportunities and partner with third-party programmes if we feel that they will benefit our student's education and experience, including but not limited to webinars, residentials, work placements, and/or apprenticeships.

When arranging external opportunities, **IntoUniversity** staff should:

- Consider if the service is safe and appropriate for the group (age/level of need/context).

- Assess **Into**University's role (are we sharing information, recruiting students, arranging transport).
- Assess any associated risk factors (travel, residential, age of students)
- Conduct necessary due diligence and arrange mitigations. Opportunities, where we are recruiting and sending students, will require us to do more due diligence than an offer shared in a newsletter.
- If the external opportunity does not meet our safeguarding due diligence then we should not move forward with the partnership until this is rectified.

If a staff member is unsure if the service or opportunity is safe for students, they should seek support from the Head of Student Opportunities or the Safeguarding Team before promoting it to children and young people or their parents/carers.

All allegations of safeguarding misconduct regarding third party providers must be immediately reported to the safeguarding team as soon as possible (always within 24 hours).

7. Safeguarding Risk Assessments

IntoUniversity's risk assessments cover all staff and volunteers who work and interact with children and young people as part of the service. In preparing risk assessments for off-site visits, staff should ensure that external providers, where appropriate, have a risk assessment in place.

IntoUniversity staff and volunteers are expected to dynamically assess risk during all activities and respond appropriately to ensure young people are supervised and we adhere to safeguarding mitigations. These should be added to risk assessments when necessary.

Individual student risk assessments will be completed for a child or young people with extenuating circumstances to ensure they can participate safely in on and off-site activities. Cases, where an individual risk assessment is needed, could include but are not limited to, young people displaying behaviours that may pose a risk to themselves or others, self-harm or external dangers such as prohibited parental contact. Individual risk assessments should be written and shared with the Centre Leader and the Safeguarding Team and discussed with the parent/carer and child/young person when it does not cause further risk to do so.

8. Children Potentially at Greater Risk of Harm

Whilst all children should be protected, it is important that we recognise some groups of children are potentially at greater risk of harm. Keeping Children Safe in Education 2025 states the

following as children and young people potentially at greater risk of harm:

- Children who need a social worker (Child in Need and Child Protection Plans)
- Children who are absent from education or those opting for Elective Home Education (EHE) - EHE can be a positive experience for a child and is not always a safeguarding concern but it does mean that children are less visible to the services that are there to keep them safe and supported.
- Children requiring mental health support.
- Care experienced children and young people.
- Children with special educational needs, disabilities (SEND/ASN) or health issues.
- Children who are LGBTQIA+ - the fact that a child or young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, they are sometimes targeted by others.

IntoUniversity recognises that these children and young people may be at a higher risk of experiencing harm. Staff should therefore be aware of children and young people with these risk factors and consider how we support them and their individual needs.

9. Glossary of Safeguarding Terminology

- **Safeguarding:** Safeguarding is the action that is taken to promote the welfare of children and protect them from harm and is defined in “Working Together to Safeguard Children 2023” as:
 - protecting children from maltreatment;
 - preventing impairment of children’s mental and physical health or development;
 - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
 - taking action to enable all children to have the best outcomes.
- **Child Protection:** Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.
- **Adult at risk:** See appendix. E for Adult Safeguarding definitions and principles
- **Children’s Social Care:** The work of local authorities exercising their social services functions with regard to children. Arrangements for children’s social care will differ within each Local Authority and each Centre Leader should ensure that they are familiar with the systems operated by their Local Authority. In Scotland, Local Authority social work departments have responsibility for social service functions with regard to children.
- **Early Help:** Staff should be alert to children who may benefit from early help, and take action to work with families and partner agencies at the earliest opportunity. Early help assessments should be carried out in partnership with the child, family, and relevant professionals.

- **Parent/Carer:** The birth or adoptive parent, legal guardian, or other person having responsibility for, or legal custody of, a child. When working with young people and their families, we may use the term 'Adult at Home' (AAH) to promote inclusive language but due to legal definition, we continue to use parent/carers in this policy.
- **Position of Trust:** This refers to certain roles and settings where an adult has regular and direct contact with children and is placed in a position of authority.

10. Internal Roles and Responsibilities

- **The Trustees** are required to take steps to protect everyone who comes into contact with their organisation from harm (Charity Commission for England and Wales, 2019; Charity Commission for Northern Ireland, 2019; Scottish Charity Regulator, 2018).
- **The Safeguarding Trustee** provides governance oversight for safeguarding within the organisation and ensures that safeguarding obligations are met at the board level. They act as an advocate for safeguarding on the board of trustees.
- **Senior Management Team Safeguarding Lead** ensures safeguarding considerations are integrated into all organisational planning and decision-making processes. They act as the liaison between the Safeguarding Team and the Senior Management Team.
- **The Head of Safeguarding** has overall responsibility for safeguarding and child protection within the organisation. They provide strategic leadership to ensure that safeguarding policies and practices are aligned with legal standards and best practices.
- **The Safeguarding Manager is the Designated Safeguarding/Child Protection Lead (DSL/DCPL)** and is responsible for the day-to-day management of safeguarding practices within the organisation. They serve as the lead professional for handling safeguarding child and adult concerns and coordinating responses.
- **The Safeguarding Team are Deputy Designated Safeguarding/Child Protection Leads (DSL/DCPLs).** They assist the Safeguarding Manager (DSL/DCPL) in safeguarding duties and provide support across the organisation. They act in the capacity of the DSL/DCPL in the absence of the Safeguarding Manager.
- **Disclosures Managers** are responsible for ensuring that all staff and all volunteers that have regulated contact with young people have an approved Enhanced DBS check (England) or are members of the PVG Scheme (Scotland).
- **Centre Leaders are Designated Safeguarding/Child Protection Officers (DSO/DCPOs) for their centre/programme.** They are responsible for the implementation of safeguarding policies in their centres and the enactment of safe working practices. They manage safeguarding cases in their centre and undertake the responsibility to alert and follow the guidance given to them by the Safeguarding Team. They should be aware of their Local Authority Child Protection Teams and referral processes. Centre Leaders are also responsible for ensuring that their volunteers have the necessary DBS checks carried out/PVG Scheme membership for the role they are undertaking.
- **Programme Managers** are responsible for the implementation of the safeguarding policies

in their programme and the enactment of safe working practices. Programme Managers manage safeguarding cases in their programme and undertake the responsibility to alert and follow the guidance given to them by the Safeguarding Team.

11. Appendices

Appendix A: Supporting Policies and Documents

Appendix B: KCSIE Indicators of Abuse and Neglect

Appendix C: Safeguarding Team and Safeguarding Process Map Posters

Appendix D: Legislative Framework and National and Local Guidance

Appendix E: Adult Safeguarding

Appendix A: Supporting Policies and Documents

The below Policies and Documents should be read in conjunction with the Safeguarding Policy. Volunteers do not need to read those applicable to staff only.

1. Staff Handbook, namely:
 - a. Code of Conduct
 - b. Behaviour Policy
 - c. Child on Child Abuse Policy
 - d. Data Protection Policy
 - e. Health and Safety Policy
 - f. Online Safety Policy
 - g. Physical Intervention Procedure
 - h. Safer Visiting Policy
 - i. Social Media Policy
 - j. Whistle-Blowing Policy
2. [Child Facing Safeguarding Policy](#)
3. [Incident Management Guidance](#)
4. [DBS New starter SG flowchart](#)
5. [PVG New starter SG flowchart](#)

Please note these are linked documents and are only available to **Into**University staff via our shared online drive.

Appendix B: Indicators of Abuse and Neglect

Abuse

Abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family, institutional, or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or by another child or children.

All staff and volunteers should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Additionally, this list is not exhaustive and any concerns should be raised via our safeguarding process.

Categories of Abuse (England: [KCSIE 2025](#) / Scotland: [National Guidance for Child Protection 2021](#))

- **Physical abuse:** causing physical harm to a child through actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. Physical harm may also result when a parent/carer fabricates or induces illness.
- **Emotional abuse:** persistent emotional maltreatment which causes severe and long-lasting adverse effects on a child's emotional development. It may involve conveying to children that they are worthless, unloved, or inadequate, silencing them, or placing age-inappropriate expectations upon them. It includes seeing or hearing the ill-treatment of others, such as domestic abuse.
- **Sexual abuse:** forcing or enticing a child or young person to take part in sexual activities, whether or not they understand what is happening. Sexual abuse includes both contact (e.g. assault by penetration, touching) and non-contact activities (e.g. involving children in the production or viewing of sexual images, watching sexual activities, encouraging sexualised behaviour, or grooming).
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may involve failure to provide adequate food, clothing, shelter, supervision, medical care, or emotional support.

Other Forms of Harm and Abuse

Child-on-Child Abuse: children can be harmed by other children. This may include bullying (including online/cyberbullying), physical abuse, sexual violence and harassment, upskirting, hazing/initiation violence, and coercive or controlling behaviours. Such abuse must never be normalised as “banter” or “part of growing up”.

Domestic Abuse: an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, between two people aged sixteen and over, perpetrated by a partner, ex-partner, family member or carer. Under the Domestic Abuse Act 2021 (England) and Scottish legislation, children are recognised as victims in their own right where they see, hear, or otherwise experience the effects of domestic abuse.

Stalking and Harassment: repeated, unwanted behaviours that make a person feel scared, distressed or threatened.

Child Sexual Exploitation (CSE): a form of sexual abuse where children are manipulated or coerced into sexual activity in exchange for something (such as gifts, money, affection, or status).

Child Criminal Exploitation (CCE): involves children being manipulated or coerced into criminal activity, including county lines drug trafficking, theft, or violent crime.

Online Abuse: includes grooming, exploitation, coercion, sextortion, sharing of indecent images, cyberbullying, and exposure to harmful content.

- Misinformation: An umbrella term to describe false, misleading or out of context material regardless of the motivation behind it. It can also be described as bad information.
- Disinformation: A deliberate attempt to mislead using material that the deceiver knows is untrue, designed to be widely shared. The purpose is often to persuade people to think a certain way, vote a certain way or to make money from advertising each time someone clicks on a story.

Online abuse may occur in isolation or alongside other forms of abuse.

Serious Violence and Contextual Safeguarding: children may be at risk of or involved in serious youth violence, gang activity, weapons-related harm, or county lines exploitation. Safeguarding must consider extra-familial contexts such as peer groups, schools, and communities. Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families.

Harmful Sexual Behaviour (HSB): developmentally inappropriate sexual behaviours displayed by children or young people which may be harmful to themselves or others.

Poor mental health: mental health is much like physical health: everybody has it and we need to take care of it. When it is good, an individual is generally able to think, feel and react in the ways that they need and want to live their life. If an individual experiences poor mental health they might find the ways they're frequently thinking, feeling or reacting become difficult, or even impossible, to cope with.

Hate incidents/crime: crime which includes prejudice or discrimination. The person focuses on your: disability, race or ethnicity, religion or beliefs, sexual orientation and gender identity. It's still a crime if someone makes an assumption about the identity of an individual and it can happen online,

in the street, at school, college, work, or at home.

NEET: Children or Young People not in training, education or working. This does not include those receiving adequate Elective Home Education (EHE). Children and young people should be in one of the above up to the age of 18 in England, and up to 16 in Scotland.

Homelessness or unfit housing: when the individual does not have a place to live. They could have a location but are still considered this if they're: sleeping rough on the streets, staying temporarily with a friend or family or 'sofa surfing', living with family in temporary accommodation, living in a B&B or squatting in a property.

“Honour-based” Abuse (HBA): abuse is often carried out to prevent, or as a result of, the victim bringing perceived “shame” on their family or the wider community. Transgressions can be relatively minor, but the consequences are significant, potentially resulting in the victim’s death. Although women are often seen as the main victims, men can be victims, too.

Forced Marriage: where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressured, or abuse is used, to force them to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights. This is not to be confused with arranged marriage, where both participants give their full consent and enter the marriage willingly.

Grooming: when someone builds a relationship, trust and emotional connection with a child or young person in person or online, so they can manipulate, exploit and abuse them. Is the planned and deliberate act of manoeuvring an individual into a position of isolation to make sure they become a key influencer or ‘trusted person’.

Adverse Childhood Experiences (ACEs): potentially traumatic events that occur in childhood that can include violence, abuse, and growing up in a family with mental health or substance use problems. Toxic stress from these experiences can change brain development and affect how the body responds to stress.

Female Genital Mutilation (FGM): when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting', but has many other names. It is a form of child abuse. It's dangerous and a criminal offence in the UK.

Radicalisation: refers to the process by which a person comes to support terrorism and/or extremist ideologies associated with terrorist groups.

Extremism: goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different

faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist (Working Together to Safeguard Children 2023).

If staff and volunteers are made aware of possible concerns, abuse or significant harm they must take steps to ensure the student is protected from harm. They should follow the same procedure as they would in section 2.1 and 2.2.

Appendix C: Safeguarding Team and Safeguarding Process Map Posters

SAFEGUARDING TEAM



Call the Safeguarding Team on

0333 188 6060

(available during core delivery hours) for support and advice regarding safeguarding concerns.

In an emergency, call emergency services on 999.



LINDSAY BOLTON
Safeguarding Manager (DS)
07718492116

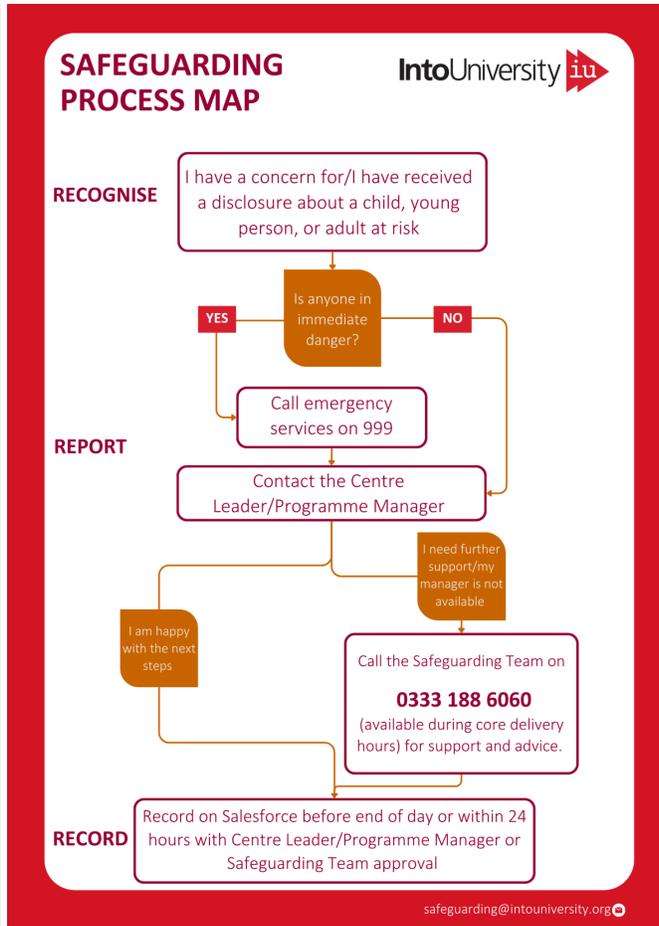
DEPUTY DESIGNATED SAFEGUARDING LEADS

 COLLEEN SHERIDAN Head of Safeguarding 07356 139952	 JENNEH EDEN-HOTAH Assistant Head of Programme Delivery 07720164467	 KYVIA KLUDWIG-JOHNSON Assistant Head of Programme Delivery 07720 924613	 ELLY RUNKLE Head of Operations (Impact and Strategy) 0756330862
 NICOLA BARNES Regional Operations Manager 07534 403995	 SUE ROWSON Regional Operations Manager 07534 404627	 ANDREW MCWHIRTER Assistant Head of Programme Delivery 07720 181026	 MICHAEL SPIERIN Head of Operations (Impact and Strategy) 07720164349

MANAGEMENT & GOVERNANCE

 ROSY SMITH Director of Programme Delivery & Operations 077 1812 8329	 RACHEL CARR Chief Executive Officer 01907 627799	 HANNAH PURKISS Chief Operating Officer 07534687946	 CLARE RICHARDS Safeguarding trustee
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safeguarding@intouniversity.org



Please note that changes in the Safeguarding Team may occur prior to the next policy review. It is the responsibility of Centre Leaders/Programme Managers to ensure the most recent version of the Safeguarding Process Map, Safeguarding Team Poster, Local Safeguarding Poster and Child Facing Safeguarding Poster is on display in centres/offices.

Appendix D. Legislative Framework and National Guidance

Legal Framework

This policy has been drawn up based on legislation, policy, and guidance that seeks to protect children, young people, and adults at risk in England and Scotland, namely:

- Children Act 1989 (and 2004 amendment)
- Children (Scotland) Act 1995
- The Care Act 2014
- Equality Act 2010
- Working Together to Safeguard Children 2023 (Inc 2025 update)
- National Guidance for Child Protection in Scotland 2021
- Keeping Children Safe in Education 2025
- Scottish Government policy: Getting it Right for Every Child (GIRFEC)
- The Online Safety Act 2023

Please note this list is not exhaustive and does not preclude other legislation and frameworks having relevance to our practices.

Children Act 2004

The Children Act 2004 sets out the vision for Children and Young People in terms of five key outcomes:

- Staying safe
- Being healthy
- Enjoying and achieving
- Making a positive contribution
- Achieving economic well-being.

The 'staying safe' outcome is underpinned by a statutory duty of all agencies working with Children and Young People to promote safeguarding in the way it carries out its function.

Section 11 of The Children Act 2004 says that every organisation working with children, young people, and parent/carer that receives grant funding must show that they are run safely.

Children and Young People have a legal right to be protected from harm under the Children Act 1989 and also the European Convention of Human Rights 1953.

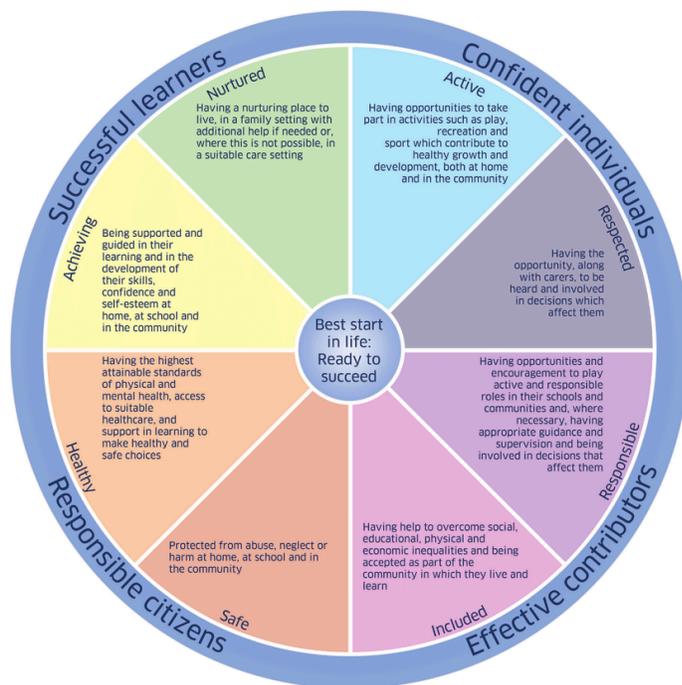
Sections 36 to 41 of the Counter Terrorism and Security Act 2015 sets out the duty on local authorities, schools and organisations to provide support for people vulnerable to being drawn into terrorism. This is known as the Channel programme. The Safeguarding Team should be contacted in the event that any staff member has a concern about a child or young person being vulnerable to being drawn into terrorism and all staff have completed PREVENT training.

Getting it Right for Every Child (GIRFEC)

In Scotland, the Scottish Government has provided policy guidance under Getting it Right for Every Child (GIRFEC), the approach:

- is **child-focused** - it ensures the child or young person – and their family – is at the centre of decision-making and the support available to them.
- **is based on an understanding of the wellbeing of a child in their current situation** - it takes into consideration the wider influences on a child or young person and their developmental needs when thinking about their wellbeing so that the right support can be offered.
- **is based on tackling needs early** - it aims to ensure needs are identified as early as possible to avoid bigger concerns or problems developing.
- **requires joined-up working** - it is about children, young people, parents/carers, and the services they need working together in a coordinated way to meet their specific needs and improve their wellbeing.

The key principles are that children are SHANARRI:



Working Together to Safeguard Children

The Government's 'Working Together to Safeguard Children', sets out how statutory and voluntary agencies should work together to promote the safety and welfare of Children and Young People. In Scotland, GIRFEC applies.

Appendix E. Adult Safeguarding

The Care Act 2014 defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect”.

The Care Act 2014 states that an adult at risk is someone over 18 years old who:

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The Adult Support and Protection (Scotland) Act 2007 states that “Adults at risk” are adults who:

- (a) are unable to safeguard their own well-being, property, rights or other interests,
- (b) are at risk of harm, and
- (c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, and are more vulnerable to being harmed than adults who are not so affected.

The definition of an adult at risk includes people aged 16 and over with disabilities and or mental disorders, illness, or physical or mental infirmity and who are at risk of harm from themselves or others. Those working with adults at risk should pay particular attention to the needs and risks experienced by young people in the transition from youth to adulthood, who are more vulnerable to harm than others. As other legislation and provisions exist which include persons up to 18 (and sometimes up to age 26 or even beyond), support under these other provisions may be more appropriate for some young persons. The responsibilities of the council and other agencies for persons aged 16-18 will extend beyond adult protection legislation.

Confidentiality

It is important to remember when working with adults that we should protect their confidentiality, meaning we would not inform parents/carers of safeguarding concerns unless we had doubts about the individual’s capacity.

Capacity

Having capacity means that a person is capable of making their own decisions. Principle 1 of the Mental Capacity Act 2005 states that everyone is capable of making their own decisions if they are given enough time, information and support unless proven otherwise. A lack of capacity should never be assumed based on a person’s circumstances.

It is essential that a staff member who doubts an individual’s capacity to make a decision contacts

the Safeguarding Team for support or advice before taking action on the individual's behalf.

Consent

Consenting to something means that a person must give their permission for it to happen. Consent should always be sought when safeguarding adults. The principle of consent is related to capacity because if a person does not have mental capacity then they cannot give fully informed consent.

At **Into**University we strive for a person-centred approach where we support the individual to make choices using the six principles of Adult Safeguarding.

In circumstances where there is an immediate risk of harm, or where the situation involves risk to someone under 18, consent and confidentiality may be overridden.

The 6 Principles of Adult Safeguarding

➤ **Principle 1 Empowerment** - Individuals are supported to make their own decisions as far as it is possible for them to do so. Individuals who are empowered are more likely to retain independence and are therefore less reliant on others and are less likely to be subject to abuse.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

➤ **Principle 2 Prevention** – It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

➤ **Principle 3 Proportionality** – Individuals should be enabled to take positive risks with the least restrictive response, as long as this maintains their safety.

"I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as I require."

➤ **Principle 4 Protection** – Individuals should be given support and representation when they need it.

"I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able."

➤ **Principle 5 Partnership** – Organisations should work closely together to better ensure positive outcomes. The sharing of information should be in line with the individual's needs, ensuring that anything pertaining to abuse is taken seriously and acted on.

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me."

➤ **Principle 6 Accountability** – Everyone should be aware of their own role and the part they play in safeguarding.

“I understand the role of everyone involved in my life.”