

---

## Safeguarding Policy

---

Responsible Office	Student Wellbeing Services
Responsible Officer	Head of Student Wellbeing Services
Approval authority	Senior Leadership Group
Date of approval	September 2021
Amended (if applicable)	August 2021
Related Procedures	Support to Study Procedure Emergency Contact Procedure Mental Health Framework Disclosure and Barring Checks (DBS) Safeguarding Vulnerable Visitors to Bath Spa Campuses: Code of Practice
Related University Policies	Student Disciplinary Policy Staff Disciplinary Policy
Effective Date	September 2021
Supersedes	Safeguarding Policy and Procedure for students Safeguarding Policy and Procedure for staff BSU Policy for Under 18s
Next review due	September 2025

## 1, Introduction

- 1.1 Our University core values of respect and inclusivity, reinforce our aim to provide a caring and compassionate environment, conducive to work, learning and research for all members of our community.
- 1.2 We take the approach that “safeguarding is everybody’s business” and empower staff and students to promote the welfare and wellbeing of all members of the Bath Spa University community, treating others with respect, compassion and care.
- 1.3 The University recognises that within its diverse student and staff community there may be members who become vulnerable at any given time. Our response to concerns will be supportive and will take account of the wellbeing of all those involved.

## 2. Purpose

- 2.1 This policy sets out the University’s approach to safeguarding children and Adults at Risk where there are concerns they are experiencing, or at risk of experiencing abuse or neglect and the type of action we may take to assess risk and provide support.
- 2.2 The University will remain mindful of its duty of care and other legal obligations, including the Health and Safety at Work Act 1974, the Data Protection Act 2018, the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

**If you are concerned that someone is at immediate risk of harm, abuse or radicalisation act now.**

- If there is immediate risk of serious harm call 999. If you are unsure, contact BSU Security 01225 87 5555 (24/7, 365 days/year).
- In non-emergency situations advice is available by contacting [Head of Student Wellbeing Services](#) (student concerns) or [Director of HR](#) (staff concerns).

## 3. Scope

- 3.1 This policy applies to:
  - All staff, students, applicants and governors of the University;
  - Consultants, contractors and contracted representatives of the University. For example, recruitment agents, ambassadors and other service providers;
  - Visitors/external organisations engaged with the University, including those contracted to conduct their own business on University premises, such as building contractors;
  - Events at external locations where staff and students are involved in University-led activity;
  - All University-led activities, including core teaching and research, outreach and widening participation;
  - Those hiring University facilities for the provision of services or activities that may involve children or Adults at Risk;
  - The Students’ Union, including the Union Board of Trustees and external partners. The University and Students’ Union are committed to working together and sharing information in order to safeguard the interests and wellbeing of children and Adults at Risk; for example, individuals and activities with student clubs and societies and volunteering.
- 3.2 Oak Tree Nursery, run by Bath Spa University has their own child protection policy and is therefore out of scope of this policy.
- 3.3 While the majority of our student population are adults, a small minority start their studies with Bath Spa University under the age of 18, see Appendix 1.
- 3.4 The University recognises that radicalisation and violent extremism can put individuals at risk of being drawn into violence and criminal activity and has the potential to cause significant harm to them. (See Glossary, Appendix 2.) In the context of the University Safeguarding Policy, the risk of being drawn into extremist ideologies and radicalisation is

considered to be a significant safeguarding concern, which is of equal weight alongside other forms of abuse and mistreatment of children and Adults at Risk.

- 3.5 When any child or adult is due to come on to the University premises, the host at the University must ensure that the children or adults are suitably protected from abuse or harm or the risk of abuse or harm. Staff planning activities which may involve children or adults must ensure that activities are competently supervised and that the University's procedures are followed. The Code of Practice, Safeguarding Children, Young Persons and Vulnerable Adults on Bath Spa University premises can be found on the Health and Safety Sulis space.
- 3.6 Bath Spa University reserves the right to request appropriate safeguarding policies and assurances from contractors and placement providers. The University expects organisers bringing under-18s into its premises, to ensure they have appropriate safeguarding procedures in place and are familiar with relevant University procedures and policies.

#### 4. Definitions, including Prevent<sup>1</sup>

- **Safeguarding:** relates to actions taken to promote the wellbeing of children and Adults at Risk and protect them from harm. Safeguarding is everybody's responsibility. Safeguarding applies if a child or Adult at Risk is experiencing, or at risk of abuse or neglect. A safeguarding concern may include if a staff member, student or BSU process presents a risk to children or adults.
- **Child:** someone under 18.
- **Adult at Risk:** someone who needs care and support, whether or not they currently receive it. Is experiencing, or at risk of abuse or neglect, and cannot protect themselves from abuse or neglect, because of their care and support needs.
- **Prevent:** safeguarding individuals from being drawn into terrorism and ensuring those vulnerable to extremist and terrorist narratives are given appropriate advice and support at an early stage. Prevent is no different to any other form of safeguarding from harm.
- **Abuse:** a violation of an individual's human and civil rights by any other person or persons.
- The University also recognises there are a range of different factors that may result in an adult being vulnerable to exploitation, radicalisation or abuse, without them coming within the legal definition of an Adult at Risk. For example: relationship breakdown, financial problems, physical or mental ill-health and social isolation.

#### 5. Roles and Responsibilities

- 5.1 The University's Lead Safeguarding Officer, LSO – University Secretary. Strategic lead responsible for:
  - Monitoring and review of the University's safeguarding policy;
  - Ensuring that the operation of the University's approach to safeguarding is sufficiently resourced in order that the University may fulfil its statutory obligations and requirements of this policy.
- 5.2 The University's Principal Safeguarding Officer, PSO for students and University Prevent Lead - Head of Student Wellbeing Services
- 5.3 The University's Principal Safeguarding Officers, PSO for staff - Director of Human Resources
- 5.4 The PSO (or nominee) responsibilities, include:
  - Implementation of the University's safeguarding policy;
  - Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date;
  - Acting as a source of support, advice and expertise to staff;
  - Acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
  - Acting upon concerns as appropriate, for example, by making external referrals to local authorities or the police;
  - Ensure that incidents/allegations/disclosures are recorded and archived accordingly;
  - Collate all safeguarding incidents and report annually in an anonymised form to Senior

---

<sup>1</sup> The University recognises the definitions set out by [Working Together to Safeguard Children 2015](#) and the [Care Act 2014](#)

- Leadership Group and Board of Governors;
- Head of Student Wellbeing Services represents the University at the Bath and North East Somerset Community Safety & Safeguarding Partnership, BCSSP and B&NES Prevent Steering Group;
- Director of HR to maintain a staff training record.

#### 5.5 Nominated Safeguarding Officer (NSO)

- 5.5.1 The NSO for each school of study or professional service department will be the Head or nominee and the CEO in the Students' Union.
- 5.5.2 The NSO is responsible for ensuring risk assessments are undertaken for all activity where students and staff may have unsupervised access to children or Adults at Risk.
- 5.5.3 The NSO must ensure the relevant PSO is informed of all incidents.
- 5.5.4 Where there are University or Students' Union activities where staff and students work with children or Adults at Risk as part of their roles, the Head of School or SU CEO may appoint a delegate NSO to take responsibility for safeguarding within that activity. This NSO will usually be the organiser or coordinator of the activity and will be DBS checked at a level appropriate to the type of activity and engagement in which they are involved.

#### 5.6 Managers and Academic leads within the University will:

- ensure all staff are aware of the BSU Safeguarding Policy and are able to refer concerns appropriately;
- build approaches within their teams and areas that promote safeguarding and wellbeing, reducing the potential for harm or abuse. For example, adhering to the Disclosure and Barring Services Policy, DBS, when recruiting staff.

#### 5.7 Staff will:

- participate in training deemed necessary for their role in relation to safeguarding;
- always refer to the relevant PSO in the event they are concerned that someone is at risk of harm or abuse, including students, colleagues, visitors, third parties, such as the child of a colleague. The principle aim of this policy is to prevent harm or abuse from occurring or reoccurring, no matter the relationship between the person at risk and the University.

### 6. Reporting Safeguarding Concerns

- 6.1 If a student or staff member believes that someone is at immediate risk of significant harm they should call the police on 999. They should also inform the University at the earliest opportunity:
  - Email: [studentwellbeing@bathspa.ac.uk](mailto:studentwellbeing@bathspa.ac.uk) (students)
  - Email: [hrcontact@bathspa.ac.uk](mailto:hrcontact@bathspa.ac.uk) (staff)
  - Call BSU Security: 01225 87 5555, for the matter to be escalated to the on call Safeguarding/Student Wellbeing Manager/ Senior Duty Executive Manager
- 6.2 Non-urgent safeguarding concerns involving staff members, including cases where they are also a student at the University, should be reported by emailing the Director of HR, to request a time to discuss the concerns in more detail, **without inclusion of identifying information**. Concerns will be assessed in order to form a view on whether there is sufficient information to suggest an incident has occurred or is at risk of occurring.
- 6.3 Non-urgent safeguarding concerns relating to students, should be reported by emailing Student Wellbeing Services: [studentwellbeing@bathspa.ac.uk](mailto:studentwellbeing@bathspa.ac.uk).
- 6.4 Any non-urgent safeguarding concerns can be reported via Report and Support: <https://reportandsupport.bathspa.ac.uk/>
- 6.5 The University Prevent Lead (Head of Student Wellbeing Services) **must be** contacted if you have a concern that someone is at risk of radicalisation, or may be at risk of exploitation, harm or abuse in relation to violent extremism. You **must not** discuss your concern with the person you are concerned about.

#### 6.6 Responding to concerns:

- All concerns raised will be reviewed and screened to mitigate against inappropriate onward referral;
- The indicators of abuse, harm or radicalisation are sometimes very difficult to recognise and it is not the responsibility of the University to determine whether a person has been abused, harmed or radicalised, but to raise concerns with appropriate services who can help;
- Safeguarding issues are highly sensitive and there is potential for further harm to be done if the situation is not responded to by appropriately skilled staff;
- Where possible any external referrals will be made with the consent and knowledge of those involved;
- The University reserves the right to refer without consent where there is serious risk, evidence, or suspicion of serious risk of harm, or disclosure is in the public interest.
- **All decisions about whether it is appropriate to breach confidentiality will be made by a PSO or LSO only.**

### 7. Associated processes

- 7.1 The University has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or Adults at Risk. Please refer to the University's Disclosure and Barring Checks (DBS) approach<sup>2</sup>.
- 7.2 All research and consultancy activities, including such activities that engage with children or Adults at Risk must comply with BSU Research Ethics Policy and Procedures, and be subject to an appropriate level of ethical approval prior to the project and data collection commencing
- 7.3 It is expected that where safeguarding concerns arise within any partner setting, including placements that the third party organisation should deal with the concern through its own safeguarding policy and procedure.
- 7.3.1 Where a concern is that a Bath Spa University staff member or student poses a safeguarding risk, following the third party's investigation where the concerns are substantiated, it should provide information to the University under this policy to enable appropriate disciplinary action to be taken. For research activity this should be escalated to the University Ethics Panel via [researchsupportoffice@bathspa.ac.uk](mailto:researchsupportoffice@bathspa.ac.uk).
- 7.3.2 The University and partner agencies should ensure that reporting protocols are in place to enable the handling of safeguarding concerns where BSU staff or students are involved.
- 7.3.3 For students on placement, you should speak with the Safeguarding Officer of the provider or employer, or your Manager/Supervisor. You should also inform the University, so we can support you. Contact Student Wellbeing Services ([studentwellbeing@bathspa.ac.uk](mailto:studentwellbeing@bathspa.ac.uk)) or your Tutor/Module Lead.
- 7.4 The University reserves the right to take action under its disciplinary procedures should it receive information that suggests a staff member or students' behaviour presents a safeguarding risk.

### 8. Retention of information

- 8.1 Written records of any safeguarding concerns will be retained for as long as is necessary, for the purpose for which it was obtained, or as legally required, or lawfully permitted.
- 8.2 Such written records will be held centrally and separately from a student's academic record.

---

<sup>2</sup> [DBS page on Sulis](#) – staff intranet.

## **Appendix 1**

### **Bath Spa University: Students under the age of 18**

#### **1. Summary**

This document outlines the approach of Bath Spa University towards prospective and current students who are under the age of 18, both in terms of safeguarding this group and ensuring an enjoyable university experience, providing reassurance to the student themselves as well as their family and support network, be that locally or internationally.

Under the Children Act 1989, a child is defined as “a person under the age of 18”. Accordingly, any students yet to reach the age of 18 years are regarded as children, including within this guidance.

#### **2. Introduction**

Most students will be aged 18 or over when they commence their studies at the University, or they will turn 18 very soon after they start.

This guidance outlines the University's approach to all applicants and students (including those holding Tier 4 visas and other international students) under the age of 18 and until their 18th birthday.

#### **3. Admissions**

The University welcomes applications from candidates irrespective of age, including those who are under the age of 18. Applications are considered on their merits and we may offer a place to under 18 students if we believe the student has the potential, intellect and academic ability to successfully complete the relevant programme of study and have sufficient personal maturity to benefit from higher education.

The only exception is where there are accreditation and legal age requirements which may preclude students under the age of 18, for instance on some health-related programmes.

#### **Admission of International Students or those on Student Route Visas under the age of 18**

Under Section 55 of the Borders, Citizenship and Immigration Act 2009, the Home Office must have regard to the need to safeguard children and protect their welfare. All children studying in the UK must have suitable care arrangements in place for their travel, reception on arrival in the UK and living arrangements while here. This applies up to a child's 18th birthday.

If upon the date the Confirmation of Acceptance for Study (CAS) is issued to Student Route applicants, or upon the date a place is confirmed as unconditional or unconditional firm for an international student, a student is under the age of 18, this procedure will be followed.

Upon application, the Admissions Team will advise the student of the information they are required to supply (see section 5), and will advise the student that this information is required at either a date prior to the CAS being issued, the date of the CAS being issued or on the date their unconditional offer is made, if they do not require a CAS. This document will be made available to this group of prospective students.

For Student Route applicants, when all academic conditions are met:

- The student or their agent/representative will be emailed the 'Under 18 Consent letter' which must be completed by the parent or legal guardian and signed and returned to the University.
- The student is required to supply contact details (see Section 4).

Upon these requirements being met, and when all other conditions are satisfied, the CAS will be issued as per the usual procedures.

It is a condition of legislation that any 16 or 17 year old prospective students, applying through the Student Route, must have their parent(s) or legal guardian(s) consent that they can live and travel independently. The University therefore has to ensure this consent has been received, which happens through the 'Under 18 Consent Letter'. This letter must be retained by the University.

**For other international applicants, when all academic conditions are met:** Section 4 applies.

#### **4. Parents and guardians**

Prior to arrival at the University, any student under the age of 18 at their enrolment date must provide the University with contact details for their:

- Parent, or
- Other legal guardian if both parents are deceased, overseas or otherwise unavailable.

Such a guardian should:

- Agree with the parents to act on their behalf and to perform the parental tasks and responsibilities delegated by them until the student's 18th birthday;
- Ideally live near Bath/in the south west of England; and,
- If necessary, be available to the student and University when required.

The University requires a copy of the guardian's agreement with the parents, as part of any offer made to the student.

A guardian is normally a friend of the family or relative living in the UK; the University is not able to appoint, or assist in finding, a suitable guardian. A list of accredited agencies is available from the Association of Educational Guardians for International students (AEGIS) – [www.aegisuk.net](http://www.aegisuk.net).

The majority of Student Route or other international students' parents or legal guardians will reside outside of the UK. In such cases, the University requires Student Route and other international students to obtain a UK-based legal guardian. Alternatively, they must provide upon application the contact details of their parent(s) or legal guardian(s) if they are ordinarily resident in the UK. No CAS will be issued without details of the student's guardian being confirmed.

#### **5. Students' general rights and responsibilities**

The University offers an adult environment and treats all students as mature, independent individuals. In particular, the University will normally deal and correspond with its students rather than with their parents.

Under the Data Protection Act 1998, students (including those under the age of 18) have the legal right for information about them not to be disclosed without their consent. Accordingly, unless this explicit consent is granted, the University is unable and will not give information to parents regarding any student's progress, results or personal circumstances. This applies to all students regardless of age.

Students are expected to seek support as they require it, and should do the following:

- Act as adults and behave in an appropriate manner
- Assume responsibility for their studies and lifestyle, including adapting to living away from home
- Engage with their academic advisor to maintain contact and allow the tutor to support them
- Have the right skills to study and live independently with diverse groups of people
- Comply with the laws of the UK, for instance the purchase, selling or use of alcohol or tobacco prior to age 18.

Although we acknowledge that anyone under the age of 18 is legally a child, and may have additional needs for support and welfare, the University will not take on the usual rights, responsibilities and authority that parents have in relation to a child and it will not act in 'loco parentis' in relation to students under age 18. The University also will not assume responsibility for any students' acts or omissions.

#### **6. Privacy & how we use your information**

We request and store details of parents/legal guardians for under 18 applicants in order to exercise our duty of care (and in the case of Tier 4 students this is a requirement of the visa). This information is stored on the relevant University information systems in accordance with legislative requirements including the General Data Protection Regulation and Data Protection Act 2018.

We use the details of parents or legal guardians very rarely. It is the University's usual policy to correspond with students and not with parents or legal guardians and this approach will also apply to students who are under the age of 18 years. Although those under 18 are regarded as children under UK law, they still generally have the legal right under the Data Protection legislation for information about them not to be disclosed. This means that the University will not usually give information to parents or legal guardians regarding the student's progress, results or any other personal circumstance unless the student has given specific consent or specific circumstances apply when the University is obliged to contact their named parent/legal guardian.

Wherever possible, the student's permission will be sought prior to us contacting their parent or legal guardian. If this is not possible, for instance because the student is incapable or unconscious, or if permission is denied or the law requires it, in very exceptional circumstances the University may contact the parent or legal guardian. This will normally be where there are serious concerns for the welfare of the individual student for example, the University becoming aware of the student being admitted to hospital, a serious illness (mental or physical), or when a student is 'missing'.

For those students not studying on a Tier 4 visa, data around parents/legal guardians will be retained until the student's 18th birthday. Following that, the information will be removed from our records. In order to continue to exercise our duty of care, we ask for next of kin/emergency contact details for all Bath Spa University students.

## **7. Student support and safeguarding**

The University wants all students to have the best possible experience while studying at the University. This is a hugely formative and exciting time for young people. For any students under the age of 18, we take steps to safeguard their health, safety and welfare.

This will normally include:

- The names of under 18 year old students will be communicated in confidence by Admissions to the relevant School, Student Accommodation Services, Student and Registry Services, Student Wellbeing Services and Students' Union
- Through notification to the School, the academic advisor will be made aware of the name of the under 18 student(s) and will meet with the student at regular intervals, agreed by the student and tutor, to discuss their studies
- A member of Student Wellbeing Services staff will meet with students under the age of 18 at regular intervals, agreed by the student and member of staff, to discuss their wellbeing and living arrangements.

## **8. Accommodation**

The University aims to provide accommodation to all its new students, although this cannot be guaranteed, or to assist them to find it locally. Residential accommodation on offer to University students is intended for the use of adults and (other than in exceptional circumstances such as disability), special arrangements are not available.

It is ultimately the responsibility of each student (including for students under the age of 18, their parent or guardian) to assess whether the accommodation on offer is suitable to their needs and whether its terms of occupancy are reasonable. The legal guardian of a student under the age of 18 will normally be asked to guarantee the payment of any rent or other accommodation fees.

## **9. Library, placements, field trips and exchanges**

Learning resources provided by the University Library (including electronic resources) are generally intended for use by over 18s, and may include adult-themed text and images. It is the responsibility of the individual not to access material which is unsuitable for their age.

As part of a programme of study, students may be required or offered the opportunity to attend field trips, placements, excursions or other off-site study activities. This is a usual part of University life and helps students build life skills so we encourage every eligible student to take part.

The University is not able to make special arrangements for students under the age of 18, in this regard, and unless otherwise specified the parents or guardians of such students are deemed to have consented to the student's participation in such activities on that basis. If a



student attends another institution or organisation they should comply with the local policies and procedures.

#### **10. Disclosure and Barring Service (DBS)**

The University conducts DBS checks for staff who satisfy the relevant criteria, to ensure suitability for working with under 18 year olds and vulnerable groups. More information is available in the DBS Policy.

#### **11. Emergencies**

In an emergency, the University will contact the parent or guardian of an under 18 student using the most recent contact details provided to it, the 'next of kin' or 'emergency contact'. Accordingly, it is important for the student to keep these details up to date.

In extreme cases (for instance where emergency medical treatment is required for the student), action may need to be taken in the best interests of the student before their parents or guardians can be contacted. In such cases, parents are deemed (by virtue of this policy) to permit a senior member of the University (acting in accordance with medical advice, as appropriate) to do whatever is necessary in the student's best interests.

#### **12. Contracts**

Any person under the age of 18 is unable to enter into a legal contract. If a student under the age of 18 needs to enter into a contract with the University, for instance relating to tuition fees or accommodation, the student's parent or guardian is required to guarantee the student's obligations under that contract.

A failure by a student to pay any sums due under a contract may result in demand being made by the University on the parent or guardian. Any continuing failure to pay the University may result in studies being interrupted.

Under 18 year olds are encouraged to actively participate in clubs and societies organised by Bath Spa University Students' Union, however they are unable to hold office until they reach age 18, as they will be unable before this age to discharge an office-holder's legal responsibilities.

## Glossary of terms

Any examples given are illustrative rather than exhaustive list.

- **Abuse** (see also 'harm') is the intentional or unintentional misuse of the power and control that one person has over another; it does not matter whether the perpetrator intended the abuse to take place or not.
  - There are many types of abuse which can include physical, sexual, psychological, financial or material, neglect, discriminatory, organisational and domestic.
- **Bullying** is threatening, abusive, intimidating, undermining or insulting behaviour that may be an abuse of power, position or knowledge.
- **Child** is a person under the age of 18 (their living arrangement or attendance at University does not change the person's status as a child).
- **Discriminatory abuse** can manifest itself in many ways however it is motivated by unfair and inappropriate attitudes, feelings or behaviour towards an individual due to their race, gender, religion, age, sexuality or disability. It can take include serious, repeated or pervasive discrimination, which leads to significant harm or exclusion from mainstream opportunities or provision of poor standards of service/care.
- **Domestic abuse** includes psychological, physical, sexual, financial, emotional abuse and so-called 'honour'-based violence committed by a family member, carer or intimate/ex-partner, regardless of gender or sexuality. It can be controlling, coercive, threatening behaviour which implies that violence might occur or may have already occurred.
- **Emotional abuse** is persistent emotional ill-treatment such as to cause severe and persistent adverse effects on a child/vulnerable adult's emotional development.
- **Exploitation** is the deliberate maltreatment, manipulation or abuse of power and control over another person; it is taking advantage of another person or situation usually, but not always, for personal gain. Exploitation may include slavery, being controlled, forced or compulsory labour, domestic violence, sexual violence and human trafficking.
- **Female Genital Mutilation (FGM)** is the deliberate mutilation of female genitalia; often the removal, injuring or cutting of the labia and clitoris where there is no medical reason for this to be done. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse.
- **Financial abuse** is the use of a person's property, assets, income, funds or any resources without their informed consent or authorisation; it may include theft, fraud, internet scamming, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse of misappropriation of property, possessions or benefits.
- **Forced marriage** is one in which one or both parties are married without their consent (unlike an arranged marriage where both parties consent to third party assistance in identifying a spouse); no-one can consent to marriage on behalf of someone else.
- **Grooming** is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, exploitation or trafficking.
- **Harm** is the ill-treatment or the impairment of health or development which can be a single act, repeated acts of a similar or different nature, intentional or unintentional, or an act of neglect or failure to act.

- **Harassment** is unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
- **Historical abuse** is abuse that took place in the past, which must still be referred using the reporting procedure.
- **Peer abuse** is carried out by children and young people towards one another and must always be taken as seriously as abuse perpetrated by an adult.
- **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and psychological needs, likely to result in the serious impairment of their health or development, such as failing to provide food, medical care, shelter, warmth and clothing.
- **Physical abuse** may include hitting, shaking, throwing, poisoning, burning, drowning, suffocating, or otherwise causing physical harm including by fabricating the symptoms or, or deliberately causing, ill-health to another.
- **Psychological abuse** includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Safeguarding** means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.
- **Self-harm** refers to a wide range of behaviours that someone does to themselves in a deliberate and usually hidden way, resulting in non-fatal injury or in the case of suicide, death.
- **Sexual abuse** is forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening; this may involve physical contact, including penetrative or non-penetrative acts. This may include involving children and vulnerable adults in looking at, or the production of, pornographic material or encouraging children/Adults at Risk to behave in sexually inappropriate ways. It also includes situations where the individual does not have the capacity to consent or has been coerced because the other person is in a position of trust, power or authority.
- **Sexual exploitation** is a form of sexual abuse, where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or Adult at Risk into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. Sexual exploitation may occur even if the activity appears consensual, and it can occur through the use of technology.
- **Trafficking** is when people are illegally transported from one country or area to another, typically for the purposes of forced labour or commercial sexual exploitation.
- **Violent extremism** includes violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activities in the name of an ideology or set of beliefs.
- **Vulnerability** describes a situation when a child or adult is at risk of exploitation, harm or abuse. A person may join the University already vulnerable, or can become vulnerable because of specific circumstances, which may increase the risk of them experiencing harm or abuse.
- **Vulnerable adult** is term previously referred to in the context of safeguarding. Now, the term used is an 'adult at risk of harm or abuse'. This still refers to a person aged

18 or over who is, or may be, in need of additional care services because of mental or other disability, age, personal circumstances or illness. An individual may be at risk of harm or abuse through being unable to take care of themselves, or unable to protect themselves against significant harm or abuse.

**Do's and Don'ts**

If someone discloses that they are experiencing harm, abuse or are feeling vulnerable to radicalisation, or if there are suspicions that someone is at risk of harm, abuse or radicalisation, consider the following guidance.

<b>Do</b>	<b>Don't</b>
In the case of a direct disclosure, be supportive	Panic
Take what the child or adult says seriously	Delay
Remain calm	Promise to keep secrets
Reassure them that it was right to tell someone	Ask them to repeat the story
Explain what will happen next – that you will refer to the Principal Safeguarding Officer	Express any of your own opinions
Write down word-for-word immediately afterwards what was said, including the time, place, and any other observations: sign and date this record	Discuss with anyone else what was told to you, other than with the Principal Safeguarding Officer and other relevant personnel
Pass the referral to the PSO	Start to investigate
Seek support for yourself from the PSO	Contact the alleged perpetrator or other people involved/mentioned
Ask the person to clarify anything you may have misunderstood	Ask closed questions or repeatedly question the individual

**Procedure**