# Safeguarding and Prevent Policy

## 1. General Policy Statement

INTO is committed to, and has a statutory and moral duty to, ensure that each Centre functions with a view to safeguarding and promoting the rights and welfare of children and adults at risk receiving education at each Centre. INTO recognises that safeguarding encompasses the duties of child protection. Safeguarding is also the protection of children and adults at risk from involvement with crime and/or terrorism.

It is the responsibility of all Employees to safeguard students.

### 1.1 Definitions

**Safeguarding:** protecting children and adults at risk from maltreatment, exploitation, harm, or abuse. This can include protection from physical, mental, sexual, or psychological harm. A list of examples of the types of abuse or harm children or adults may encounter can be found in Appendix 1 of this document. Safeguarding is also the protection of children and adults at risk from involvement with crime and/or terrorism (see Prevent).

INTO's safeguarding responsibilities comply with statutory requirements and Department for Education advice and guidance, including:

- The Children Act 1989
- The Education Act 2002
- The Education Act 2011
- The Sexual Offences Act 2003
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Counter Terrorism and Security Act 2015

**Prevent:** part of the government's anti- terrorism strategy. Higher Education has been identified as a sector where young people may be radicalised. This strand of the anti-terrorism strategy aims to prevent young people getting involved in terrorism.

**Children:** are those students under the age of 18 up to but not including their 18th birthday.

**Adult at risk (formerly known as vulnerable adults)**: adults as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and/or those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

### 1.2 Scope

Whilst there is a statutory requirement to safeguard children and adults at risk , there is no such requirement for non-adults at risk. However, the emphasis at INTO Manchester is of supporting the well-being of the whole student and staff community.

With regard to Prevent, INTO Manchester are subject to the

Office for Students (OfS) "Prevent Duty: Framework for monitoring in higher education in England", which requires the organisation to monitor susceptible students for signs of radicalisation.

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

The policy applies to all employees, managers, volunteers, contractors and consultants working for INTO Manchester.

This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and employees. Such policies can be found in the INTO Manchester website, Virtual Learning Environment and are referred to in the Employee Handbook. The Management Committee will have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and employees in each Centre.

### 1.3 Aims

The main elements and aims of the policy are as follows:

- To promote good practice and raise awareness of Safeguarding and Prevent issues, including, amongst all INTO employees, managers, volunteers, contractors and consultants in order to provide a safe environment in which all children can learn and develop;

- To promote awareness of the designated safeguarding leads or senior level employees with Child protection responsibility within each Centre, and at Senior Executive/Director level for the Company;

- Confirmation that INTO employees with be provided with relevant training in order to make informed and confident responses to specific child protection issues;

- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse or radicalisation;

- Confirmation that INTO practises safe recruitment in checking the suitability of employees to work with children.

## 2. Promoting Good Practice – Guidelines

The policy and practice of our Safeguarding and Prevent Policy is made with reference to the Government Guidelines "Working Together to Safeguard Children", Keeping Children Safe in Education and the Counter-Terrorism and Security Act 2015. These guidelines will be adhered to as Best Practice in respect of procedures and responding to any issue.

2.1. All children and adults regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse.

2.2. All children and adults at risk have the right to be safeguarded from being drawn into terrorist or extremist activities (radicalisation).

2.3. All employees should treat all students equally with respect and dignity.

2.4. All employees to understand that strong emotions can be aroused by certain child abuse situations. However, it is vital that these feelings do not interfere with one's judgement about the appropriate action to take.

2.5. All employees should work to establish and maintain an environment where children and adults at risk feel secure, are encouraged to talk, and listened to.

2.6. All employees are required to raise concerns about children and adults at risk to the relevant people, as set out in this policy, so they can be addressed, and a confidential record established

2.7. All employees have a crucial role to play in identifying welfare concerns, and indicators of abuse, neglect and radicalisation.

2.8. All employees are encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations.

2.9. All employees should be aware of their duty to raise concerns about the actions or attitudes of their colleagues under the Speak Up Policy (Whistle blowing policy) see UK Employee Handbook available on the intranet IUP.SHAREPOINT.COM ( ). We recognise that children and adults at risk cannot be expected to raise concerns in an environment where employees fail to do so.

2.10. All staff must follow the guidelines for appropriate staff behaviour and conduct with regards to Safeguarding (see Appendix 2. Safeguarding Code of Conduct)

2.11. All visitors must be signed in and out of the Centre and must be escorted when on the premises.

2.12. If there is a concern about a dangerous or illegal activity or any wrongdoing within INTO Manchester and there is a fear of raising it within the company, staff can contact the NSPCC Whistleblowing Advice Line on 0800 0280 285

## 3. Online Safety

3.1 INTO Manchester has a duty of care to safeguard all its stakeholders including staff, students and visitors and is committed to providing a safe online environment for study and work. INTO Manchester Online Safety Policy should be read in conjunction with the Safeguarding and Prevent Policy.

3.2 The Online Safety Policy covers current online safeguarding risks, including harmful content, online contact and conduct, misinformation and disinformation, sharing of nude or semi-nude images, and risks associated with generative artificial intelligence. Appropriate filtering and monitoring arrangements must be reviewed at least annually, with checks and actions documented.

3.3 All staff should be aware of the potential harm and risks to students from the online environment. Staff and students share responsibilities to report concerns and follow the guidance outlined between the two policies.

Staff must report concerns about child-on-child abuse, including bullying, discrimination, sexual harassment or violence, coercive control, criminal or sexual exploitation, and harmful behaviour online. Such behaviour must not be dismissed as banter or an inevitable part of growing up. The DSL will consider the welfare and protection of everyone affected, including the child alleged to have caused harm.

## 4. Designated Safeguarding Lead

4.1 The Designated Safeguarding Lead (DSL) with overall responsibility for safeguarding and prevent issues at INTO Manchester is the Centre Director.

4.2 The Centre will also have additional senior managers trained to DSL level to act as Deputy DSL in the Centre Director's absence.

4.3 The Centre Director will lead the Safeguarding and Prevent board which will consist of:

Centre Director
Director, Support Services Academic Director
HR Manager

| Name | Role | Contact Numbers | Email Address |
|---|---|---|---|
| Dawn Abbott | Centre Director | 0161 631 1204 / 07894 391 125 | dawn.abbott@intoglobal.com |
| Sion Jones | Director, Support Services | 0161 631 1206 / 07770 334 543 | sion.jones@intoglobal.com |
| Diarmuid Fogarty | Academic Director | 07464 907 790 | Diarmuid.fogarty@intoglobal.com |
| Deborah McQuinn | Senior People Partner | | Deborah.mcquinn@intoglobal.com |

*(Senior People Partner – employee related matters only)

The board will receive appropriate training and support for their role, and all INTO employees will be made aware of their contact details.

4.4 The DSL will take lead responsibility for raising awareness amongst employees within the Centre of issues relating to the welfare of children and young people, Prevent and the promotion of a safe environment within the Centre.

4.5 The Safeguarding and Prevent Board will also be responsible for ensuring the employees in their Centre know how to respond appropriately to situations/issues as they may arise in the Centre and will ensure that their employees are also working in a "safe environment".

4.6 The Safeguarding and Prevent Board is responsible for:

4.6.1 Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.

4.6.2Providing advice and support to other employees on issues relating to Safeguarding and Prevent.

4.6.3 Ensure that employees in the Centre know how to respond appropriately to Safeguarding or Prevent situations/issues as they may arise.

Safeguarding records must include the concern, actions taken, decisions made, reasons for decisions, referrals and outcomes. Records are confidential, securely stored, and shared promptly with relevant safeguarding professionals on a lawful need-to-know basis; data protection must not prevent necessary safeguarding information-sharing.

4.6.4 Maintaining secure storage of all referrals, complaints or concerns, separately from the student file.

4.6.5 Ensure that the parents of under 18-year-old students have access to our Safeguarding and Prevent Policy online.

4.6.6 Liaising with appropriate agencies.

4.6.7 Ensuring that all employees are provided with appropriate training and are aware of the policy and procedures and conduct themselves appropriately including the management committee.

4.6.8 Ensuring that all suspicion and allegations of abuse are taken seriously and responded to swiftly and appropriately by the Safeguarding and Prevent Board.
The DSL will consider whether a child requires community-based early help, targeted Family Help or referral to children's social care, and will work with relevant agencies in line with Working Together to Safeguard Children 2026. Particular consideration will be given to children facing overlapping risks or

additional vulnerabilities, including mental health needs, disability, medical conditions or caring responsibilities.

4.6.9 Ensuring that appropriate safeguarding and prevent risk assessments are undertaken and any issues are addressed by the Safeguarding and Prevent Board.

4.7 The Safeguarding and Prevent Board will know how to:

4.7.1 Make an appropriate referral.

4.7.2 Be available to provide advice and support to other employees on issues relating to safeguarding and prevent. By having a DSL/DDSL available onsite or by telephone.

4.7.3 Have particular responsibility to be available to listen to children and young people studying with INTO Manchester.

4.7.4 Deal with individual cases, including attending case conferences, channel panel and review meetings as appropriate.

4.7.5 Receive appropriate training and support for this role, on a regular basis in line with best practice within the area of safeguarding and prevent.

4.7.6 Ensure appropriate risk assessments are undertaken and any issues are addressed. promptly and referred to the Safeguarding and Prevent Board.

4.7.7 INTO has also nominated the Senior Vice President, UK Operations and Partnerships to take overall responsibility for promoting Safeguarding and Prevent and ensuring that the policy and processes are executed and reviewed appropriately.

## 5. Procedures for Identifying and Reporting Cases or Suspected Cases

5.1 Employees will not investigate, but will, wherever possible, elicit enough information to pass on to the DSL, in order that they can make an informed decision of what to do next.

5.2 For all non-emergency safeguarding concerns, including student disclosure, Employees will:

- Take seriously and listen carefully to what is being said, stay calm, getting as clear a picture as possible, but avoiding asking too many questions at this stage;
- Note the main points carefully and make detailed notes of the date, time, place, persons present, and information disclosed by the student;
- Avoid giving promises of complete confidentiality – this will be on a need to know basis in order to help the students;
- Explain that there is duty to tell the DSL, and that their concerns may be shared with others who could have a part to play in protecting them;
- Reassure them that they will be involved in decisions about what will happen, and if possible, try to find out what the student wants to happen;
- Complete the Non-emergency Safeguarding Concerns recording form (appendix 3);
  If the DSL or Deputy DSL is unavailable, or a child remains at risk and action has not been taken, staff must not delay: they should contact children's social care or the police directly as appropriate and inform the DSL as soon as possible. A referral should not be withheld because another colleague has not responded.
- Immediately report to the DSL

5.3 When responding to an emergency safeguarding concern:

- Make an immediate evaluation of the risk and take steps to ensure that the student is in no immediate danger;
- Where appropriate, dial 999 for an ambulance if there is a need for emergency medical treatment;
- Immediately report to the DSL

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

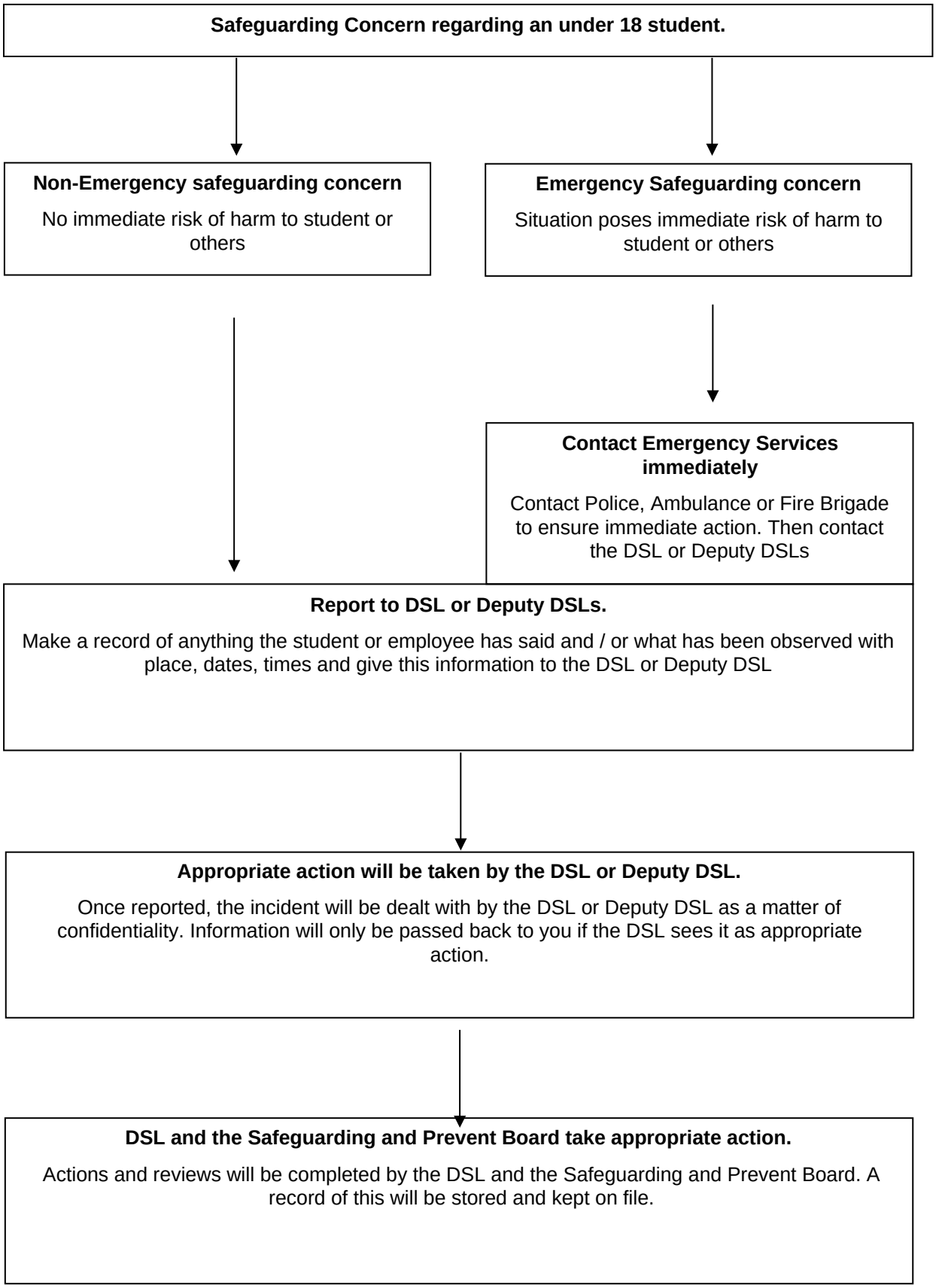
5.4 Referral of concerns regarding radicalisation: Staff must report any concern about a student being drawn into terrorism without delay to the DSL or Deputy DSL. The DSL will assess the concern and, where appropriate, seek advice from the local Prevent team and consider a referral through the applicable Prevent/Channel process. Any immediate threat must be reported to the police on 999. Staff should record the facts and must not investigate independently.

5.5 Reporting and dealing with allegations of abuse against employees:

- All concerns and allegations about staff, volunteers, contractors and other adults working with students, including low-level concerns, must be reported promptly to the Centre Director/DSL in accordance with the staff safeguarding and allegations procedures. Where the concern relates to the DSL, it must be reported to an appropriate senior manager outside the allegation. The person receiving the allegation must consider whether the local authority designated officer (LADO) should be contacted, and must seek LADO advice where the relevant harm threshold may be met. Staff must not investigate allegations themselves.UK Employee Handbook

Safeguarding referrals and any police or LADO enquiries take priority over internal disciplinary processes. Actions, decisions, reasons and outcomes must be recorded securely, with support considered for the student and any staff member involved.Working together to Safeguard Children.

**Reporting Procedure flowchart**




Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

These procedures describe the response that should be made to any situation where there is knowledge or concern that a student is at risk. They provide employees with information about the steps that they should take if they suspect a student is at risk. (Please refer to appendix 1 for definitions of abuse or harm).

Employees must report any concerns to the Designated Safeguarding Lead or the Deputy Safeguarding Leads.

Where information sharing is necessary and proportionate to safeguard a child, relevant details must be shared promptly with appropriate agencies and recorded. Staff should not promise secrecy or assume that data protection rules prevent safeguarding disclosures.

## 6. Confidentiality

6.1. Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the student, parents (where applicable) and accused person (where applicable) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect the student, facilitate enquiries, manage related disciplinary or suitability processes.

## 7. Support

7.1. INTO will work together with Children and Adult Services and/or police, where they are involved, and consider the impact on the child or adult at risk concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the student's needs are addressed. INTO will also ensure that our students are not disadvantaged by language limitations and will ensure that an independent interpreter is available as appropriate.

## 8. Relevant Training and Guidance for INTO Employees

8.1. INTO Manchester will ensure all employees are provided with sufficient training and support in relation to Safeguarding and Prevent

8.2 All Centre employees will receive basic Safeguarding and Prevent training, via either online or face- to-face methods. Key staff will undertake higher level Safeguarding and Prevent training as required.

8.3 Safeguarding and Prevent training will be updated every 2 years as a minimum, however additional briefings may be provided within this period, driven by changes in legislation or local conditions / circumstances.

8.4 All staff, including those who do not work directly with children, must read Part One of Keeping Children Safe in Education 2026 in full on induction and at least annually when updated. The Centre will keep a record of staff confirmation that they have read and understood the guidance; the overview is supplementary and does not replace Part One.

The INTO Manchester approach to Safeguarding and Prevent will be covered in the induction sessions for all new employees.

8.5 All INTO employees will be advised of the management of internet use and the filtering and monitoring processes conducted regularly

8.6 All employees will receive a copy of this policy and access to other related policies and relevant procedures.

8.7 All employees will have information accessible to them regarding appropriate behaviour and conduct, which is included in the UK Employee Handbook.

## 9 . Safe Recruitment of Employees

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

9.1 INTO will ensure that as part of its recruitment policy all employees working in the Centres:

9.1.1 Appropriate pre-employment checks, including the correct level of DBS and barred-list checks where legally permitted and required for the role, must be completed before the individual undertakes regulated activity. Any permitted start pending outstanding checks must be subject to a documented risk assessment, appropriate supervision and applicable legal restrictions.

9.1.2 Will have been interviewed, and reference checked as far as practically possible to a satisfactory level PRIOR to start date.

9.1.3 Will have had their identity checked PRIOR to start date.

9.1.4 Will have seen documentary evidence of their qualifications PRIOR to start date.

9.1.5 All gaps in CVs will be investigated

9.1.6 As part of due diligence, appropriate online searches of shortlisted candidates will be considered and conducted in line with current statutory guidance, equality requirements and data protection obligations.

9.1.7 All offers of employment are conditional upon meeting the above requirements.

9.2 INTO as part of its responsibilities in the safer recruitment of its employees will ensure that at least one member of each interview panel has received specific Safer Recruitment training.

## 10 Designated Safeguarding Leads and Deputies Contact Details

**INTO Manchester, Bridgewater House, 58-60 Whitworth Street, Manchester, M1 6LT**
INTO Manchester reception – 0161 631 1200

INTO Manchester Designated Safeguarding Leads and Deputies

| Name | Role | Contact Numbers | Email Address |
|---|---|---|---|
| Dawn Abbott | Centre Director | 0161 631 1204 / 07894 391 125 | dawn.abbott@intoglobal.com |
| Sion Jones | Director, Support Services | 0161 631 1206 / 07770 334 543 | sion.jones@intoglobal.com |
| Diarmuid Fogarty | Academic Director | 07464 907 790 | Diarmuid.fogarty@intoglobal.com |
| Deborah McQuinn | Senior People Partner | | Deborah.mcquinn@intoglobal.com |

*(Senior People Partner – employee related matters only)

## 11 Further Information

**The following links will take you to further Safeguarding and Prevent information and advice**

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards-updated-22-january-2019.pdf

https://www.officeforstudents.org.uk/media/19b94eed-d2ad-4a9b-bb92-ee0b410a1f1f/ofs2018_35_a.pdf

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

Appendix 1.

## INTO recognises the following as definitions of abuse:

**Physical Abuse -** Physical abuse causes harm to a child's person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Neglect –** Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological need, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, failing to ensure adequate supervision or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.

**Sexual Abuse –** Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

**Emotional Abuse -** Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of abuse, though it may occur alone.

**Radicalisation -** Radicalisation: act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind

Extremism*: holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to Core British values: including

(i) democracy
(ii) the rule of law
(iii) individual liberty
(iv) respectful tolerance of different faiths or beliefs.

*NB: extremism can refer to a range of views, e.g. racism, homophobia, right wing ideology, left-wing, anarchist and single-issue extremism, as well as any religious extremism.

Employees, students and other adults (group leaders, homestays etc.) may arrive at INTO Manchester already holding extremist views. Or, whilst attending the centre, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more. People who are vulnerable/susceptible are more likely to be influenced, their vulnerability could stem from a range of causes, including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, and bereavement.

Appendix 2

# INTO MANCHESTER STAFF SAFEGUARDING CODE OF CONDUCT

INTO Manchester is committed to safeguarding and promoting the welfare of children and adults at risk who are receiving an education with INTO Manchester.

This Safeguarding Code of Conduct outlines behaviours expected of INTO Manchester staff.

All staff must:

- Always act in a professional manner, recognising we are in a position of trust.
- Dress in ways that are appropriate to the job role.
- Never embark on a personal relationship with a student.
- Treat students fairly, without prejudice, discrimination, or favouritism.
- Ensure face to face and online contact and communications with students is appropriate.
- Never connect with students via social media, unless it is a requirement of your role and then this must only be using company devices.
- Ensure activities involving a single student occurs in a space easily observed by others.
- Never give personal mobile phone numbers or email addresses to students or communicate with students by text message (unless from an INTO Manchester device), personal email or via personal social media sites.
- Avoid behaviour or communication that might be misinterpreted by others, including the way in which social media is used.
- Never have unnecessary physical contact with students and be aware that minor forms of friendly physical contact can be misconstrued.
- Only use physical restraint when a student is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort and if possible, with another member of staff as a witness.
- Never meet with students off campus except on official INTO Manchester or University business, avoid alcohol, and never meet at your own home.
- Never give/offer lifts by car or other private transport to students, and do not travel alone with a student(s) by taking another member of staff along with you.
- Always inform students the purpose of taking still or moving photographs of them and how these photographs will be used. Do not use personal devices to take photos/videos of students.
- Never give guarantees of confidentiality to students wishing to disclose information or make an allegation; only guarantee that the information will be passed on to those that need to know in order to ensure that the proper action is taken.

Appendix 3.

## Non-emergency Safeguarding Concerns recording form

This report is to record student incidents that occur at any point of the day but also other incidents that occur in the building

| Date | Time | Location |
|---|---|---|
| | | |
| **Student / Employee Name(s)** | **Student Number** | **Email/Contact number** |
| | | |
| | | |
| | | |
| | | |
| Incident Summary: | | |

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027

Appendix 4.

## Non- Emergency Prevent Concern Referral Form

This report is to record student prevent related incidents or concerns.

| Date | Time | Location |
|---|---|---|
| | | |
| **Student / Employee Name(s)** | **Student Number** | **Email/Contact number** |
| | | |
| | | |
| | | |
| | | |
| Incident Summary: | | |

Reviewed: October 2026 / Reviewed by: Sion Jones – Director Support Services Next Review Date: August 2027