

Safeguarding Policy

Version	1.0
Date last updated:	July 2025
Next update:	July 2026
Category	Safety security and Environment
Document Owner:	Designated Safeguarding Lead
Publication:	Public

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The **Designated Safeguarding Lead (DSL)** at the UK School of Professional Studies (SPS) is:

DSL

- **Zerka Sahak**
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- **020 8774 1150 (9am – 6pm)**

Concerns about the safeguarding and the welfare of any student at SPS should be referred to one or other of the above.

Procedures for raising concerns are covered in Section 4 of this policy.

If there is grave or immediate danger to life, the correct procedure is to call 999 and request the assistance of the emergency services.

1. Introduction and Policy Aims

- 1.1. This policy outlines our commitment to ensuring the safety and well-being of all enrolled learners (students) and the procedures for reporting and managing safeguarding concerns. **The UK School of Professional Studies (SPS)** recognises its duty of care to safeguard learners from harm.
- 1.2. The primary aims of this policy are to:
 - i. **Protect Learners:** Ensure all learners, regardless of their background or course of study, are protected from harm, including abuse, neglect, bullying, harassment, and all forms of exploitation.
 - ii. **Establish Clear Procedures:** Provide clear, effective, and accessible procedures for learners and staff to report and manage safeguarding and Prevent concerns promptly and sensitively.
 - iii. **Promote learner welfare:** Foster a culture within SPS that supports Learners' wellbeing and allows them to participate in learning free from the fear of harm.
 - iv. **Ensure Compliance:** Meet all statutory and legal requirements (outlined in [Appendix A](#): Legal Framework)

2. Scope of Policy

- 2.1. **This policy and its procedures apply to the safeguarding of learners** and are mandatory for all SPS staff, visitors, volunteers, and contractors. Concerns about the wellbeing of SPS staff members should be referred to the HR Team.
- 2.2. Safeguarding is distinct from the ongoing, routine support provided by other services such as Student Support and Welfare or Academic Support. While this policy governs the initial response, safeguarding disclosures may serve as the entry point to several other procedural pathways. (Related policies and procedures are outlined in [Appendix B](#)).
- 2.3. While SPS is a provider for learners aged 19 and above, we recognise our duty of care to any children and any vulnerable adults at risk (someone less able to

protect themselves from harm or exploitation), that we come to understand are at risk of harm. This may include:

- Children and vulnerable adults that are not being supervised,
- Children and vulnerable adults that are being abused, or are at risk of being abused,
- Where human trafficking is suspected.

2.4. This policy is distinct from the School’s Health and Safety Policy, which deals with the mitigation of risks to the immediate physical safety of persons on SPS’s premises.

The Prevent Duty

2.5. SPS is committed to meeting its statutory requirements the *Counter-Terrorism and Security Act 2015* to have **due regard to the need to prevent people from being drawn into terrorism** (the Prevent Duty)

2.6. While both are duties to protect individuals from harm, a **Conventional Safeguarding Concern** typically relates to harm caused to an individual by others or themselves, whereas a **Prevent Duty Concern** is specifically about protecting an individual from being drawn into **terrorism** or **radicalisation**. Whilst there can often be some common factors present in both risks, the procedures to be followed may differ.

2.7. Individuals responding to safeguarding or Prevent concerns should use their best judgement to identify the nature of the risk; however, the following offers a general distinction:

	Conventional Safeguarding Concern	Prevent Duty Concern
Focus	Harm/abuse experienced by the individual.	Individuals being drawn into terrorism/extremism.
Nature of Harm	Physical abuse, sexual abuse, emotional abuse, financial abuse, neglect, self-harm, domestic abuse, modern slavery.	Exposure to extremist ideology, showing sympathy for radical views, accessing terrorist materials, grooming into extremist groups.

Typical Procedure	Referral to the Designated Safeguarding Lead (DSL) . Potential referral to Adult Social Care or Police (depending on the nature of the abuse).	Referral to the Designated Safeguarding Lead (DSL) Potential referral to the Channel* programme via the local authority/Police.
Key Indicator	Signs of injury, distress, financial manipulation, fear of a person/group, unexplained absence.	Expressing vocal or active opposition to fundamental British values (democracy, rule of law, individual liberty, mutual respect), justifying violence, sudden and dramatic change in behaviour, isolation.

*‘Channel’ (referred to above) is a multi-agency safeguarding programme designed to support individuals who are vulnerable to being drawn into terrorism. It works with individuals on a voluntary and confidential basis, involving partners from the local authority, police, health, and education sectors to identify risk and create tailored support plans.

- 2.8. The requirements of the Prevent Duty extend beyond safeguarding and relate to several other processes such as hosting external speaker events or attending off-campus events, online safety, pastoral support and facilities management. These requirements are embedded within our policy framework and summarised within SPS’ *Prevent Duty Strategy*; this policy deals specifically with the safeguarding element of the duty.

3. Roles and Responsibilities

Designated Safeguarding Leads

- 3.1. SPS will ensure the availability of both a male and female Designated Safeguarding Leads (DSLs) at any teaching it operates.
- 3.2. **The DSLs are primarily responsible for managing all safeguarding and Prevent Duty concerns** within SPS. They act as the point of contact for staff, learners, and external agencies.

The full duties of the DSL are Given in [Appendix C](#).

Recipients of a Disclosure

- 3.3. Anyone who is the recipient of a disclosure indicating someone may be at risk should try to **gather as much information as possible** about the matter, and must **report it to the DSL** without delay; guidance on this is covered in [Appendix D](#).
- 3.4. Information about how and when to share personal information about someone at risk is covered in Section 6 of this policy.

The Governing Body of SPS

- 3.5. The Governing Body of SPS will ensure that the necessary **policies, procedures, personnel, and resources** are in place, and that those with responsibility for the safety and welfare of learners are briefed, trained and competent to discharge these duties.
- 3.6. Further to 3.5, the Governing Body of SPS will:
- evaluate the adequacy and effectiveness of the School's provisions for learner safeguarding,
 - review and update this policy to ensure statutory compliance,
 - take ultimate responsibility for demonstrating to external bodies, such as **Ofsted** and the **Office for Students** (or other such bodies which inspect against the Prevent Duty and safeguarding standards), that SPS is meeting all its legal and statutory obligations.

4. Procedures for Reporting a Concern

- 4.1. Any member of staff with a safeguarding or Prevent concern must immediately report it to the DSL.

General Safeguarding Concerns

- 4.2. A conventional safeguarding concern relates to the abuse or neglect of an adult student (e.g., physical, sexual, financial, or neglect). Staff must remain alert to indicators such as:
- **Unexplained physical injuries** or signs of trauma.
 - Signs of **neglect**, poor hygiene, or inadequate self-care.
 - Sudden or unusual **financial hardship** or loss of control over finances.

- Expressions of fear, anxiety, or control by another individual (e.g., domestic abuse).

Procedure for Staff

- 4.3. Any member of staff with a conventional safeguarding concern must immediately report it to the **Designated Safeguarding Lead (DSL)**. The DSL will:
- i. Record the concern.
 - ii. Assess the risk to the student.
 - iii. Consult with the student (if safe and appropriate) and/or make a referral to **Local Authority Adult Social Care** or the **Police** if a crime is suspected or the risk is significant.

Identifying and Reporting a PREVENT Concern

- 4.4. A Prevent concern is raised when a member of staff reasonably believes a student may be at risk of being drawn into terrorism. This includes, but is not limited to:
- **Vocal Support for Extremism:** Expressing views that justify violence or express support for proscribed terrorist groups.
 - **Accessing Extremist Content:** Viewing or sharing propaganda or extremist materials online.
 - **Grooming/Isolation:** Sudden withdrawal from friends, family, or normal activities, and forming new, secretive affiliations.
 - **Dramatic Change in Appearance/Behaviour:** Changes consistent with adopting an extremist identity or ideology.

Procedure for Staff:

- 4.5. Any member of staff with a Prevent concern must immediately report it to the **Designated Safeguarding Lead (DSL)**. The DSL will then consider a referral to the multi-agency **Channel** process, which is designed to provide support to those vulnerable to being drawn into extremism.

If you are a Learner (student)...

- 4.6. Learner have several options for reporting a safeguarding or Prevent concern:

OPTION 1: The Designated Safeguarding Lead (DSL):

- The quickest and most direct way to report a concern is to contact the **Designated Safeguarding Lead (DSL)** using the contact information on Page 1.
- Learners can arrange a private meeting by phone or email.

OPTION 2: Any Member of SPS Staff:

- Learners can speak to **any tutor, lecturer, administrator, or support staff member** they feel comfortable with.
- **Staff Duty:** All SPS staff are trained to know that they **must immediately pass the concern** to the DSL, even if the student asks them not to (if the concern involves a risk of serious harm).

- 4.7. Concerns submitted anonymously and will be investigated, however this is discouraged as we may need to contact the disclosure to gather more information. Anyone making an anonymous disclosure about an individual at risk should be aware that SPS may not be able to investigate the matter fully or sufficiently.

What to Report

- 4.8. Learners should report any concern that involves:

- **Abuse or Neglect:** If they or another learner are being subjected to physical, sexual, emotional, or financial abuse or neglect.
- **Domestic Abuse:** If they are experiencing issues in their home life, including domestic violence or controlling behaviour.
- **Mental Health Crisis:** If they or another learner are experiencing a severe mental health crisis or expressing intent to self-harm or attempt suicide.
- **Extremist Views:** If they hear another student expressing views that justify violence or terrorism or show support for extremist groups.

- **Grooming:** If they notice another student becoming suddenly isolated, secretive, or being actively sought out by individuals/groups promoting radical ideologies.
- **Inappropriate Material:** If they see extremist literature or material being shared on premises or online networks.

What Happens After a Report?

1. **DSL Review:** The DSL will receive the report and review it to determine the level of risk.
2. **Action:** The DSL will decide whether the concern requires:
 - **Internal Support** (e.g., welfare support).
 - A **Statutory Referral** to external agencies like Adult Social Care or the Police.
 - A **Channel Referral** (for Prevent concerns).
3. **Feedback (where possible):** The reporting student will be given feedback on what action was taken, *unless* sharing that information would compromise the safety, confidentiality, or an investigation of the matter.

5. Limits to Confidentiality

- 5.1. While SPS treats all concerns with the utmost respect for privacy, **absolute confidentiality cannot be guaranteed** where a student or another person is identified as being at risk of serious harm or being drawn into terrorism (Prevent). There a number of reasons for this:
 - i. **Statutory Duty:** SPS is bound by law to fulfil its duty of care, specifically the requirement to safeguard adults at risk of abuse or neglect (Adult Safeguarding) and its statutory duty under the Counter-Terrorism and Security Act 2015 (Prevent Duty).
 - ii. **Overriding Safety:** The legal and ethical duty to protect an individual from serious harm **always overrides** the duty to maintain confidentiality.

- iii. **Procedure:** If a student discloses information to any member of staff that suggests a risk of **serious harm, a crime has occurred, or the student is vulnerable to radicalisation**, the staff member **must** pass this information immediately to the Designated Safeguarding Lead (DSL).
- iv. **Information Sharing:** The DSL will then make a professional decision on whether to share this information with external statutory agencies (e.g., Police, Adult Social Care, or the Channel panel) **without the student's consent or against their wishes**, if it is deemed necessary to prevent serious harm.

5.2. The student will be informed of the necessity to break confidentiality **before** a referral is made, whenever it is safe and appropriate to do so.

Note: In sensitive cases such as domestic abuse, it is crucial to proceed with the student's consent where possible, as police involvement can have unintended consequences. However, this principle does not prevent SPS from taking action without consent where there is a legitimate concern of an **immediate risk to the life or safety of any person, particularly a child or vulnerable adult**.

6. Record Keeping and Information Sharing

- 6.1. The DSL shall keep secure records of all safeguarding disclosures and action taken in response to these. These will be retained in accordance with SPS' data retention schedule.
- 6.2. The Designated Safeguarding Lead (DSL) and staff must adhere to SPS' Data Protection Policy when documenting any safeguarding or Prevent concern:
 - **Necessity and Proportionality:** The DSL will only record and share information that is **necessary, relevant, and proportionate** to the concern. Avoid sharing or recording unnecessary personal data.
 - **Factual and Secure:** Records will be **factual, accurate, and contemporary**. All records will be stored securely and confidentially, separate from general student records, in line with SPS' data retention schedule.
 - **Record Decisions:** Whether a decision is made to share information or *not* to share information, the **rationale for that decision must be clearly recorded** by the DSL.
 - **Document Transparency:** The DSL will maintain a record who the information was shared with, when it was shared, and the lawful basis relied upon (see below).

Lawful Basis for Information Sharing (UK GDPR)

- 6.3. Sharing **Special Category Data** (such as health, criminal convictions, or political opinions relating to extremism) for safeguarding purposes, two lawful bases must be established:

A: UK GDPR Lawful Basis: Public Task

The most appropriate lawful basis for sharing information to safeguard an adult student is generally **Public Task**.

- **Definition:** Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller (SPS).
- **Application:** SPS' duty to safeguard adults at risk and its statutory obligation under the **Prevent Duty** are clear examples of performing a task in the public interest with a clear basis in law. This allows SPS to share data with local authorities, the police, and other statutory partners to fulfil these duties.

B: Special Category Data Condition: Safeguarding of Individuals at Risk

Safeguarding concerns often involve *Special Category Data* (e.g., medical conditions, mental health issues, or political opinions relevant to radicalisation). To process and share this sensitive data, SPS relies on a condition under Schedule 1 of the DPA 2018.

- **Condition:** Processing is necessary for the purposes of **protecting an individual from neglect or physical, mental or emotional harm, or for protecting the physical, mental or emotional well-being of an individual** who is aged 18 or over and **at risk**.

Consent vs. Duty to Share

- 6.4. SPS' duty to safeguard overrides the individual's right to confidentiality when there is a risk of serious harm:
- **Consent:** While staff should strive to inform learners of the need to share information (transparency), **consent is not the legal basis for sharing** if a student is deemed to be at risk of serious harm.

- **Overriding Objection:** If a student with capacity objects to information being shared, the DSL must weigh this against the risk of harm. If the risk meets the threshold for referral to statutory agencies (e.g., high risk of harm or Prevent concern), the information **will be shared without consent**, and the decision and rationale will be recorded.
- 6.5. All disclosures where there is a grave or immediate risk to life or serious harm should be made in person. The person who receives the disclosure should immediately **contact the Emergency Services through calling 999**. Then, alert security staff, the Campus Dean, the Designated Safeguarding Officer, and the Designated Safeguarding Lead.
- 6.6. Disclosures with immediate risk to life or serious harm include:
- Where a student has threatened to seriously harm themselves or end their life
 - Where a student has threatened to seriously harm or kill someone else
 - Where a student has made a credible threat of a terrorist attack to be committed by themselves or someone else
 - Where the threat to life or serious harm involves a child or minor (under 18)

Appendix A: Legal Framework

This policy is informed by and seeks to comply with key UK legislation and guidance,:

- *The Safeguarding Vulnerable Groups Act 2006*
- *Protection from Harassment Act 1997*
- *The Counter-Terrorism and Security Act 2015 (the Prevent Duty)*
- *The Equality Act 2010*
- *The Data Protection Act 2018 and UK GDPR*

Appendix B: Related Policies and Procedures

This policy is part of a broader framework designed to ensure people studying, working or visiting at SPS can enjoy a safe academic and professional environment; these include our:

- **Health and Safety Policy** – which sets out how people studying, working or visiting at SPS are protected from physical harm when attending or using SPS’ facilities, and how the security of premises are managed.
- **Code of Conduct** – establishes clear expectations for the behaviour of individuals at SPS, including behaviours which are not tolerated by the School.
- **Student Support Policy** – which ensures that all learners at SPS receive the necessary advice, guidance and support to achieve successful academic and professional outcomes to their studies.
- **Data Protection Policy** – covers how and when personal information should be shared, in accordance with all statutory legislation.
- **Safer Recruitment (of Staff) Policy** – sets out procedures followed by SPS to ensure that those appointed in teaching roles are fit an proper and do not pose a safety risk
- **Online Safety Policy** – sets out how SPS will manage its IT facilities and networks to ensure that appropriate access controls are in place.
- **Relationships at Work Policy** – This policy outlines our position on intimate and/or exclusive personal relationships between learners and staff and between work colleagues. This is to ensure that no blurring of judgement or conflict of interest arises.

Appendix C: Key Responsibilities of the Designated Safeguarding Lead

The DSL's duties cover both Conventional Safeguarding and the Prevent Duty.

Case Management and Referrals

- **Be the Expert:** Maintain an **up-to-date working knowledge** of local authority adult safeguarding procedures, the Prevent Duty guidance, and the **Channel** referral process.
- **Receive Concerns:** all disclosure of safeguarding and Prevent concerns raised by staff or learners are reported to the DSL in the first instance.
- **Assess and Decide:** Assess the seriousness and urgency of any concern. Determine whether it meets the threshold for referral to **Local Authority Adult Social Care**, the **Police**, or the **Channel** programme.
- **Make Referrals:** Oversee and manage all statutory referrals, ensuring they are timely, accurate, and made in accordance with local procedures.

Internal Procedures and Record Keeping

- **Establish and Monitor Procedures:** Ensure the SPS' internal reporting and record-keeping systems are clear, accessible, and rigorously followed by all staff.
- **Secure Records:** Ensure all safeguarding and Prevent records are kept **confidential** and securely stored, separate from general student files, and retained in line Data Protection Policy and the Data Retention Schedule.
- **Review Cases:** Regularly review ongoing cases and concerns to ensure appropriate action is being taken and that the student's safety and well-being remain paramount.

Training, Awareness, and Culture

- **Staff Training:** Conduct appropriate and regular **safeguarding and Prevent Duty training** at an induction and on an ongoing basis (refresher training).
- **Raise Awareness:** Promote a culture where staff and learners feel confident and comfortable raising concerns, and where **fundamental British values** are actively championed to counter extremism.
- **Liaison:** Act as the main link with external partners, including the Local Authority Safeguarding Adults Board, the police, and other relevant agencies, to ensure the SPS's policies align with local arrangements.

Dealing with Prevent Referrals (DSL Specific)

When a Prevent concern is raised, the DSL must:

1. **Review the Concern:** Immediately review the internal referral, seeking clarification from the reporting member of staff if necessary.
2. **Consult Locally:** Consult with the local police Counter-Terrorism Policing (CTP) unit or local authority Prevent lead to discuss the concern and agree on the next steps.
3. **Refer to Channel:** If the risk is assessed as genuine, make a formal referral to the local **Channel Panel** process.
 - *Note: Channel is a voluntary, multi-agency intervention process that provides support to individuals who are vulnerable to being drawn into terrorism. It is not a criminal justice measure.*
4. **Manage Welfare:** Ensure that any immediate welfare needs of the student are met while the referral is being processed.

Appendix D: Guidance on Receiving Disclosures

This guidance can be used by anyone receiving a disclosure of harm.

Disclosures of risks of harm may be alarming to the recipient and contain information of a very sensitive nature. This guidance seeks to reassure anyone receiving a disclosure.

Any one receiving the disclosure should:

- Treat the disclosure seriously,
- Focus **on the discloser**:. Use basic, clear communication techniques:
 - **Listen, Don't Lead**: Allow the student to speak without interruption.
 - **Validate**: Use simple phrases to show you believe them and that they've done the right thing ("Thank you for telling me," "I believe you").
 - **Maintain Calm**: Use controlled breathing to keep your own voice and body language calm and regulated, which can help regulate the student.
- Do not promise confidentiality,
- Listen carefully to what is disclosed,
- Make concise and accurate records of what is disclosed,
- Remain calm and not express shock, surprise, or disbelief,
- Try to gain as much information as possible but avoid interrogating the discloser,
- Discuss appropriate follow-up action.
- Refer the matter to the **Designate Safeguarding Lead** as soon as possible.

Receiving a disclosure—whether of abuse, neglect, or radicalisation risk—can be emotionally demanding for anyone. For those who have experienced past trauma, a disclosure may trigger strong personal reactions, including distress, anxiety, or feelings of powerlessness.

Staff are encouraged to seek support *after* making the referral. It is a sign of strength, not weakness, to recognise when you need help processing a difficult event. You can:

- **Inform Your Manager**: Briefly inform your line manager (or another senior colleague) that you have been involved in a difficult safeguarding disclosure and may need flexibility or time for self-care. You do not need to share the student's details.

- **Speak to the HR Team** about confidential, professional counselling to process their reaction to the trauma disclosed

Leaners (students) may contact Student Support who will consider the most appropriate support strategy based in internal policy. Additionally, leaners can request a debriefing from the DSL to provide closure about the event.

If you are unable to receive a disclosure that you can either introduce the discloser to the DSL directly (this could either be in-person or arranging a call in a private space).

Version History

Safeguarding Policy

Version	Changes	Date	Approved by:
0.1	Draft	-	-
1.0	First Approved versions – appendices added	July 2025	Governing Body