



University of
Salford
MANCHESTER

Safeguarding Policy

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Authors:

University Designated Safeguarding Lead

Deputy University Designated Safeguarding Lead

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1.0 Purpose

This policy is intended to ensure that all children, young people, adults at risk and those who work with them are safe and supported in our university. The University is mindful of its duty of care and legal obligations, such as those it owes under the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015. This policy reflects the need to ensure the safety of the whole university community and incorporates the Prevent agenda.

2.0 Definition

For the purpose of this policy, we refer to the legal definition of safeguarding which reflects protecting the health, wellbeing and human rights of children, young people and adults at risk, enabling them to live safely, free from abuse and neglect. This includes:

- an anticipatory element to prevent harm
- an oversight element to protect those in the course of our activities
- a quality assurance element to ensure protection standards are met; and
- a reporting element to ensure swift and effective action if concerns are raised.

Adults in a vulnerable situation are also referred to within this policy, in the understanding that 'safeguarding' in a wider sense involves supporting individuals who may not be identified as a child or adult at risk but may require immediate support from a welfare perspective to enable them to stay safe.

Further definitions and examples are provided within Appendix 1.

3.0 Scope

3.1 This Policy applies to all university colleagues (including students who undertake paid work for the university), University Council members, third party employees, associates, students across all programmes of study including apprenticeships and volunteers. However, it is specifically aimed at colleagues, students, and volunteers who encounter the following groups through teaching, research, professional services, placements and outreach activities:

- Children (i.e. those aged under 16),
- Young people (i.e. those aged 16 to 18)
- Adults at risk of harm, and
- Adults in a vulnerable situation.

The individuals this Policy applies to are referred to as members of the university community from this point forward.

3.2 This policy should be consulted in conjunction with the University's Policy on the [Admission and support of students under the age of 18 Policy](#)

3.3 This policy does not cover:

- Busy Bees nursery on university premises - as an independent organisation it is covered by its own comprehensive child protection policies in accordance with legislation and Ofsted requirements
- The Students Union which has their own safeguarding policy as an independent organisation
- Campus Living Villages which has their own safeguarding policy and procedures as an independent organisation
- A general duty of care for visitors on university premises. This is referenced in the University Health & Safety Policy and subsidiary documents
- Members of the University community who are not mentioned in 3.1

4.0 Policy Statement

4.1 The University approach to safeguarding is to ensure the safety of the whole university community and incorporates the Prevent agenda. Further information regarding our approach and structure is available within our [Safeguarding Hub](#).

4.2 The University wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children, young people and adults at risk when in contact with university students and colleagues (whether acting in a paid or unpaid capacity). However ultimate responsibility for anyone under the age of 18 will continue to remain with parents and guardians or for those in care, the responsible local authority.

4.3 While it is impossible to ensure that a child, young person or adult at risk of harm/in a vulnerable situation would never come to any harm, the adoption of this policy and associated guidance aims to facilitate the management of the risk associated with the duty to protect such individuals.

4.4 This policy does not seek to discourage working with vulnerable groups but rather to support the safe delivery of these activities.

4.5 To achieve its aims in respect to safeguarding the University focus spans six key areas:

1. Risk Assessment
2. Recruitment, selection and employment procedures
3. Dealing with suspicions and allegations of abuse
4. Training and Support
5. Under 18s
6. Sexual Violence and Harassment

5.0 Prevent: Dealing with concerns about radicalisation and extremism

- 5.1** The duty to safeguard children, young people and adults at risk of harm extends to protecting them from involvement with groups that set out to radicalise individuals. Section 26 of the Counter Terrorism and Security Act (2015) places a duty on Higher Education providers to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty.
- 5.2** The University of Salford fulfils its responsibilities to protect vulnerable people from radicalisation and extremism as part of the wider Safeguarding duty. More information is available on our webpages about [The Prevent Duty](#).
- 5.3** The University operates a [Freedom of Speech Policy](#) intended to ensure compliance with legal requirements, including Prevent duty guidelines, whilst protecting its duty to ensure freedom of speech for colleagues, students and visiting speakers on the University's premises.
- 5.4** The Department for Education encourages universities to promote fundamental British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The University's commitment to this is contained in our [Statement on British Values](#).
- 5.5** In circumstances where referral of a member of the university community to Prevent is being considered (i.e. who may be vulnerable or susceptible to radicalisation), please refer to the Guidance set out in Annex J: Prevent Referral Guidance. In any event, concerns that you may have regarding an individual must be raised with the Prevent Lead or Prevent Officer who will be happy to advise and discuss appropriate actions.

6.0 Key Areas of the University's approach: 1. Risk Assessment

- 6.1** All colleagues that intend to, or may be put in the position of, working with children, young people or adults in a vulnerable situation should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.
- 6.2** Colleagues who are contracting external parties to work on the University's behalf or allowing or enabling external parties to use University estate or facilities, should also ensure that where those bookings include children or adults at risk of harm, those external parties are familiar with the University's Safeguarding policy procedure and guidance.
- 6.3** A designated individual should complete a risk assessment before any new or changes to existing programmes, events, visits or any other activity which involve children, young people or adults at risk of harm are undertaken, or before admitting or employing an individual under the age of 18.
- 6.4** All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

7.0 Key Areas of the University's approach: 2. Recruitment, selection and employment procedures

- 7.1** The University applies Safer Recruitment principles and will take all appropriate steps during the recruitment and assessment process to ensure the safeguarding of all employees, students and those who use the campus. This includes measures to ensure that unsuitable applicants are prevented from working with children, young people under the age of 18 and adults in a vulnerable situation at the university.
- 7.2** Where a risk assessment has identified that students or colleagues are likely to have regular contact with or encounter children, young people under the age of 18 or adults in a vulnerable situation (which might include regular processing of information), appropriate checks into their eligibility for employment will be required.
- 7.3** Where colleague roles are identified as involving regulated activities, HR will undertake any checks or screening for individuals.
- All roles will include 2 references from their most recent employers and a DBS check where required
 - Dependent on the nature of the role, some roles may require additional or enhanced checks.

Failure to satisfy the necessary screening requirements may result in a withdrawal of offer or termination of employment.

- 7.4** The University will ensure that any colleague or any student who will have substantial one-to-one contact with children, young people under the age of 18 or adults in a vulnerable situation or at risk of harm, and their role falls within the regulated activity criteria, will be regularly required to undertake a DBS check. The DBS process for colleagues is managed by the HR function at the university.

8.0 Key Areas of the University's approach: 3. Dealing with suspicions or allegations of abuse

- 8.1** Concerns for the safety and well-being of children, young people under the age of 18 and adults in a vulnerable situation or at risk could arise in a variety of ways at the university and in a range of different settings. For example:
- a person may report or display signs of abuse
 - someone may hint that a child, young person under the age of 18 or adult in a vulnerable situation and / or is at risk of harm or that a colleague is an abuser
 - an individual may witness or hear about abuse
 - A child, young person under the age of 18 or adult in a vulnerable situation is in the presence of abuse, whilst not being the recipient

Concerns may be encountered as student to student, colleague to student, colleague to colleague or as part of duties/ study being undertaken.

It is essential to act quickly and professionally in all cases of suspected abuse. Genuine concerns of abuse should be reported early, regardless of obtaining evidence.

8.2 Any allegation by a child, young person under the age of 18 or adult in a vulnerable situation or at risk of harm against a colleague, another student, someone external to the university or a volunteer should be reported immediately to the relevant designated individual who has responsibility under this policy (See Annex B).

Where a member of the university community has a suspicion that a child, young person under the age of 18 or adult in a vulnerable situation or at risk may be experiencing harm or abuse, these suspicions should be reported to the relevant designated individual as above. In dealing with any such allegation or suspicion, the University has a duty of care both to the child, young person under the age of 18 or adult in a vulnerable situation or at risk of harm concerned and to the colleague, student or volunteer against whom the allegation is made.

8.3 Colleagues and students on work-based placement learning in clinical settings, health care and social care may come into regular contact with children, young people under the age of 18 and adults in a vulnerable situation or at risk. Students on work-based placement learning are encouraged to refer to the safeguarding policy and procedures of the organisation in which they are carrying out their placement. However, if this is not appropriate or if no action is taken, students are encouraged (with the support of their Personal Tutor or Placement Tutor) to follow this Safeguarding Policy for reporting of safeguarding concerns (Appendix B).

8.4 Education institutions which are partner organisations to the University will have their own safeguarding policy and reporting procedures in place. Members of those institutions are advised to consult with and follow their own organisation's safeguarding policy as the first course of action.

8.5 Where activities take place on campus that involve children, young people under the age of 18 and adults in a vulnerable situation or at risk from other institutions (e.g. summer schools/campus visits) the colleagues responsible for organising and managing these events are expected to familiarise themselves with the Safeguarding Policy and any other relevant policies and procedures (Summer School Safeguarding Policy).

8.6 Where there is an allegation against a colleague of the university, checks will be made by HR to determine whether that individual undertakes regulated activity with children, young people under the age of 18 and / or adults in vulnerable situations or at risk, as part of the investigation process. In cases where it is established that regulated activity with children, young people under the age of 18 and / or adults in a vulnerable situation or at risk, the appropriate Safeguarding Leads will be informed about the case and depending on the allegation may be required to inform the Local Authority Designated Officer (LADO) and/or DBS.

- 8.7** Where a safeguarding allegation is made against a colleague who teaches, supports or has influence on health or social care related courses, as part of the investigation process, the appropriate safeguarding leads will be informed about the case and may seek advice from the Local Authority Designated Officer (LADO) or the appropriate Adult Safeguarding Team on possible action needed.
- 8.8** In instances of alleged sexual misconduct, even if the alleged victim is not a child, young person under the age of 18 or an adult in a vulnerable situation or at risk of harm, as part of the investigation process, the appropriate safeguarding leads will be informed about the case and may seek advice from the Local Authority Designated Officer (LADO) or the appropriate Adult Safeguarding Team on possible action needed.
- 8.9** Where the University becomes aware of a safeguarding concern relating to a student on a programme of study that includes placements with children, young people under the age of 18 or adults in a vulnerable situation or at risk, the AD(SE), Deputy Designated Safeguarding Lead and Designated Safeguarding Officer linked to the school, will work with the Local Authority Designated Officer (LADO) to ensure appropriate information is shared, risk assessments are completed and the appropriate action is taken to ensure safety of patients/service users.
- 8.10** To assist you in your decision-making regarding dealing with suspicions or allegations, please see flowchart attached in Annex H: Learner Risk Flow Chart and Annex I: Apprentice Risk Flow Chart

9.0 Key Areas of the University's approach: 4. Training and support

The University will provide appropriate support information and training on this policy to ensure colleagues are fully informed of their responsibility under the safeguarding agenda. All colleagues are required to undertake safeguarding training (including Prevent awareness training) during on-boarding and as part of the University training refresh schedule protocols and guidance. All training and support information is facilitated through the university's Safeguarding infrastructure and is supported by the colleague-facing resources on the [Safeguarding Hub](#).¹

10.0 Key Areas of the University's approach: 5. Under 18s

Risk assessments will be completed for all students under the age of 18 who are studying with the University.

Please see the Admission and Support of Students under 18 years of age Policy for a full description of how the University manages the admission and support of students under the age of 18.

11.0 Key Areas of the University's approach: 6. Sexual violence and harassment

¹ This is a SharePoint link and is only accessible to internal users at the University.

- 11.1** The University employs a Sexual Violence Liaison Officer(s) /Domestic Abuse Caseworker(s) to support with reports of sexual violence and harassment from students. Such cases are assessed on a case-by-case basis, a process which includes the completion of a risk assessment for reporting students, responding students and any wider risk to the university.
- 11.2** Where a case involves a student-on-student allegation, the University may take action through the Student Misconduct Procedure or Fitness to Practice Policy. These cases will be assessed on a case-by-case basis, through the Student Case Management Group (or school in cases of fitness to practice) who will appoint an investigator from a pool of colleagues who have received specialist training in this area. (See related documentation)
- 11.3** Where a case involves an allegation by a student against another student, both students will be contacted and offered wellbeing/welfare support.
- 11.4** Allegations of sexual violence/harassment against a university colleague will be managed through Human Resources (see 8.7). In cases where such reports involve a colleague who is identified as having access to students who are under the age of 18 or adults at risk, Human Resources will notify the Designated Safeguarding Lead.
- 11.5** In cases where a colleague is alleged to have committed sexual violence/harassment and leaves the organisation before an investigation is complete, the investigation will continue in their absence and The Designated Safeguarding Lead will be informed of the outcome.

12.0 Policy Enforcement

- 12.1** Where a safeguarding concern has been raised and identified as requiring Social Services support (with the support of a DSO), it **must** be reported and discussed with the relevant team in Social Services (and/or the Police). This will ensure that the risks are managed, and appropriate action is considered. It is not an option to 'wait and see' or to dismiss the concern as not relevant.
- 12.2** Failure to report suspicions/allegations of harm, abuse or exploitation (including concerns around radicalisation) as per the Reporting Process in a timely or appropriate manner will be treated seriously and may be investigated in accordance with the relevant University disciplinary policy. Where appropriate, failures to report safeguarding concerns may also be referred to external agencies such as the Police or Social Services for consideration of further action.

Related Documentation²

- [Summer School safeguarding Policy](#)
- [Personal Relationships Policy](#)

² SharePoint links only accessible to internal users at the University.

- [Health & Safety Policy](#)
- [Risk Assessment Code of Practice and Form](#)
- [Student Misconduct Policy](#)
- [Fitness to Practise Policy & Procedure](#)
- [Employee Disciplinary Policy](#)
- [Work-Based Learning Policy](#)

13.0 Appendices

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Appendix 1: Definitions and Interpretations

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Abuse (Definition and explanation)

Abuse is a violation of a person's human and civil rights by another. There is no exhaustive list of what may constitute abuse or exploitation. Abuse can:

- Consist of a single act or repeated acts or multiple types of harm
- Be intentional or unintentional or result from a lack of knowledge
- Be an act of neglect, an omission or a failure to act
- Cause harm temporarily or over a period of time
- Involve taking advantage of existing vulnerabilities and needs that a person has: people in need of identity, friendship or care, who are frustrated, lost or feel they don't fit in
- Involve manipulating or 'grooming' someone to get benefit or advantage or to make the person do something illegal or manipulating or dehumanising emotions to see others as outsiders and non-human – justifying actions – "they deserve it"
- Occur in any relationship; or be perpetrated by anyone, individually or as part of a group or organisation
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on computer equipment

Abuse (Types)

Physical

Includes hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions, or otherwise causing physical harm.

Bullying, Harassment or Discrimination

Includes direct or indirect discrimination on the grounds of race, sex, sexual orientation, transgender status, religion or disability.

Emotional

Includes intimidation and threats, continuous criticism, controlling behaviour, emotional blackmail

Sexual

Sexual abuse can include both physical and non-physical components. It can involve rape, inappropriate touching, forcing or grooming someone to take part in sexual activities or to touch or take part in sexual activities with someone else.

Economic or Financial

Includes controlling money and budgets, preventing someone from getting a job, running up debts in that person's name.

Institutional

Maltreatment of a person brought about by poor or inadequate care or support.

Internet/ Electronic

The use of modern communication technologies (e.g. internet, text or video messaging, e-mail, chatrooms, social media such as Snapchat or Instagram) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them or to influence towards particular views about people or society. Often closely linked with child sexual exploitation and the posting of illegal images but can be relevant generally to 'grooming' or drawing people towards extreme views or actions.

Abuse (Examples)

Child Sexual Exploitation

A form of sexual abuse against children. This occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. This does not always involve physical contact; it can occur through the use of technology³

Criminal Exploitation

This occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or adult in a vulnerable situation. The victim may have been criminally exploited even if the activity appears consensual. Age is most often a factor in the imbalance of power, but other factors can also create vulnerability to exploitation including gender, cognitive ability, physical strength, status, and access to economic or other resources. Criminal exploitation can involve force and/ or enticement-based methods of compliance and is often accompanied by violence or threats of violence⁴.

Domestic Abuse/ Violence

An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence by a partner or ex-partner.

Female Genital Mutilation (FGM)

A procedure where a female's genitals are deliberately cut, injured or changed without medical reason. This can include partial or total removal of external female genitalia. It is also known as 'female circumcision', 'cutting' or by local terms such as *sunna*, *guniin*, *halalays*, *tahur*, *megrez*, *khitan* and others.

³ Department for Education, 2017. Child sexual exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf [Last accessed 23/07/20]

⁴ Home Office , 2018. Criminal Exploitation of children and adults at risk: County Lines guidance. Available via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf [Last accessed 24/07/20]

Forced Marriage

A marriage where one or both parties do not consent to the marriage, with pressure or abuse being used.

Honour Based Violence

A form of domestic abuse where women are often punished for bringing 'shame' on a family. Honour based violence can exist in any culture or community, and males can also be victims.

Human Trafficking

Involves the recruitment, harbouring or transporting individuals into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. This can include forced prostitution, forced labour, forced begging, forced criminality and forced marriage.

Modern/ Domestic Slavery

The illegal exploitation of people for private or commercial gain. Individuals are trapped in servitude, which they were deceived or coerced into, and are unable to leave.

Abuse (Possible Signs)

- An accumulation of many changes in behaviour or appearance e.g. emotional, verbal and social behaviour as well as physical changes
- Constantly being in receipt of new possessions which is out of character
- Any allegation of mistreatment
- Sudden, significant or unexplained change in behaviour
- Inappropriate sexualised or risky behaviour
- Concerns or injuries without an adequate explanation
- Change in attitudes, defensive, quick to anger
- Isolated and withdrawn or conversely forcing opinions on others
- Non or poor attendance, change in standard of work
- Physical and clothing changes
- Being singled out and actively being discouraged from contact with friends and family

Adults at Risk of Harm

"...a **vulnerable adult**, or an **adult at risk**, is a person over the age of 18 who is unable to take care of themselves. It can also refer to one who is unable to protect themselves against significant harm or exploitation. It is important to note that this does not necessarily mean that the adult lacks competency. **To be classed as vulnerable, the adult's circumstances must be unable to be altered or improved by the adult's own individual actions without direct assistance**" [NHS England Guide to Safeguarding](#)

External Agencies such as Social Services and charities may have their own definitions of an adult at risk.

It is important to remember that adults, including adults at risk of harm and adults in a vulnerable situation, have the right to self-determination. This can include making decisions which others may suspect will be harmful to their interests. It will not usually be legal to override this. The most usual exceptions would be: if they lack capacity; if the risk is immediate and serious; or if a child is being put at risk by the decision.

Adults in a Vulnerable Situation

When considering whether a person is vulnerable or at risk, it is relevant to consider all their circumstances. Someone who would not otherwise be considered at risk of harm may be considered as vulnerable when all the elements of their situation are taken into consideration. Example of relevant factors may include:

- Physical or mental disabilities
- Language or community difficulties
- Learning differences
- Social isolation
- International or refugee status
- Health conditions, particularly those long term
- Drug or alcohol dependence
- Care leavers or estrangement
- Homelessness
- Permanent or temporary reduction in physical, mental or emotional capacity, brought on by significant life events
- Adults experiencing domestic abuse

British Values

The government has specified a set of values, named 'British Values' which universities are expected to promote. These values are: (i) democracy, (ii) the rule of law, (iii) individual liberty, and (iv) mutual respect and tolerance of those with different faiths and beliefs. The University's statement on commitment to British Values and how we embed these can be found on our webpages about [The Prevent Duty](#).

Child/Children

A person or persons under the age of 18 years.

Disclosure and Barring Service (DBS)

A statutory body helping employers make safer recruitment decisions and prevent unsuitable people from working with children and other at-risk groups. The DBS does this through criminal record checking and maintaining two barred lists where information shows individuals pose a risk of harm to children or adults at risk.

Extremism

The UK government defines extremism as the vocal or active opposition to fundamental British values, democracy, the rule of law, individual liberty and mutual tolerance of different religions and beliefs. The Counter Terrorism and Security Act 2015 also includes calls for the death of members of the armed forces, domestically or overseas, in the definition of extremism.

Prevent

Prevent is the duty in the Counter Terrorism and Security Act 2015 on specified authorities, including Higher and Further Education institutions to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation

Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Safeguarding

There are different definitions of safeguarding which are used by different agencies in different contexts, for example, Schools, FE Colleges, Universities, Social work settings.

Terrorism

Defined as an action which endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing political, religious or ideological cause (S.1 Terrorism Act 2000).

Young Person/ Young People

A person or persons who are aged 16-17, but for the purpose of this policy, will come under the definition of a child

Annex A: Safeguarding Governance

Safeguarding & Prevent Steering Group: Consists of DSL & Prevent Lead, Deputy DSL's, Prevent Officer, Head of Student Support, Head of Security, Deputy Head of Security, Programme Leader for BSC Professional Policing, Equality and Diversity, HR, Legal, USSU and AD(SE) representatives. Meetings are held quarterly to review processes, procedures and policy, to ensure the university remains effective within and across safeguarding and prevent and continues to operate in accordance with any new legislation. The Safeguarding and Prevent Steering Group reports to ULT and Council level committees on an annual basis in line with the OfS annual Prevent monitoring cycle.

Safeguarding & Prevent Network: All relevant colleagues including DSO's are required to attend these events which are held at least once a year. These events allow colleagues to access CPD, share good practice and discuss and concerns they have with their role and the University processes, which can be fed back into the Steering Group.

Annex B: Roles and Responsibilities

Safeguarding is the responsibility of **everyone** in the University community. All members of our community have a role to play in keeping ourselves and each other safe and have a duty to take action if we are concerned for the wellbeing of another, whether this is on university premises or not.

The following structures are in place to support members of the University Community with this responsibility:

Designated Safeguarding Lead Responsibility:

Accountable for all Safeguarding and Prevent concerns at the University, and responsible for overseeing the management of safeguarding issues within the University. Overall responsibility for ensuring Safeguarding Policy and Procedures is updated appropriately.

Named Person: currently Head of Student Cases, Conduct & Safeguarding

Deputy Designated Safeguarding Lead Responsibilities:

Operational responsibility for statutory (under 18's and adults at risk) Safeguarding and Prevent provision across the University

- Oversee the training of the Designated Safeguarding Officers and colleagues as necessary
- To develop and reform safeguarding policy and procedure across the University alongside Designated Safeguarding Lead
- To attend external meetings to represent safeguarding at the University
- To triage safeguarding concerns through the Universities report and support function
- To support DSO's with complex cases
- To act as Prevent Officer working in partnership with the Prevent Lead

Named Person: currently Complex Case Managers (shared)

Designated Safeguarding Officers Responsibilities:

- To provide localised safeguarding and Prevent advice and support to the University community
- To support relevant colleagues to make a referral to social services and/or police
- Closely monitor the welfare of colleagues / students under the age of 18, in conjunction with Student Support where necessary, in accordance with Keeping Children Safe in Education 2018
- Liaise with Human Resources to ensure appropriate DBS checks are taking place.

Named Persons: Student Experience Manager/Programme Manager (for Salford Languages see Learning and Teaching Manager)

Associate Dean Academic AD (SE) /School Business Manager (SBM)

- To work with Designated Safeguarding Officers to ensure appropriate risk assessments are carried out for relevant activities
 - a. Assist in resolving issues which may arise within their schools, while carrying out responsibilities for Safeguarding
 - b. Ensure all colleague compliance with this safeguarding policy as an **absolute priority**

Human Resources:

- To manage allegations of misconduct against colleagues
- To inform the DSL and Deputy DSL of safeguarding allegations involving colleagues
- To manage Recruitment, Selection and Employment processes and procedures

All colleague responsibilities:

- Treat all safeguarding concerns as an absolute priority, and follow guidance laid out in this policy
- To report any concerns about safeguarding immediately to a Designated Safeguarding Officer
- To help foster a safe and inclusive community for all colleagues/ students
- To ensure that colleagues and students, regardless of background, enjoy similar experiences and outcomes, including the support they receive
- Complete the Safeguarding e-Learning module and any other related training as required

All students responsibilities:

- To report any concerns about a fellow student's wellbeing to the University
- To help foster a safe and inclusive community for all adults and young people
- To undertake any training in this area as required

Annex C: Guidelines on risk assessment in relation to safeguarding vulnerable groups

- Admission and Support of Students under the age of 18

The University has in place specific policies and procedures around managing applications from, and monitoring the welfare of, students who are under 18 years of age. Colleagues who have contact with these students should ensure they are familiar with the University [Safeguarding Policy](#) and the [Admission of Students under 18 years of age Policy](#)

- Academic research

As part of the governance of research and to ensure all research activities are conducted ethically, the University has developed [Safeguarding guidance for researchers, research students and participants](#) which can be found on the [Academic Ethics pages](#) on the Staff Hub.⁵

- Other activities

Before organising or undertaking any activity which may involve colleagues or students (whether acting in a paid or unpaid capacity) working with members of a vulnerable group, a risk assessment should be conducted, part of which should cover safeguarding issues.

The type of activity where a risk assessment would be required includes (but not limited to):

- i) Teaching, supervision and support of students
- ii) Conference office bookings for halls of residence, leisure facilities etc
- iii) Outreach and widening participation initiatives, taking place on or off campus, as well as summer schools or other events such as work experience
- iv) Placements with health and social care institutions as part of professional training or provision of podiatry, complementary medicine or other treatments
- v) Provision of counselling, occupational health or other welfare services for students or colleagues; Research projects
- vi) Excursions, volunteering and other social activities or student societies.

The risk assessment should be conducted by the 'owning' School or Professional Service, together with any other University teams or external providers who may need time to contribute to the assessment.

There are no fixed rules on how a risk assessment should be carried out, although the following general principles should apply:

a. Incorporate the standard health and safety risk assessment

The Health and Safety Office has developed a [Risk Assessment Code of Practice](#) on risk assessment which is available from the at the [Health & Safety](#) document library on the staff Hub.⁶ This is accompanied by a Risk Assessment form, which you may find useful and can adapt to your needs.

⁵ This is a Sharepoint link and is only accessible to internal users at the University.

⁶ This is a Sharepoint link and is only accessible to internal users at the University.

b. Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups

This will enable you to identify potential risk situations such as occasions where a single adult is in the company of a lone child, or adult in a vulnerable situation and where there is little, or no possibility of the activity being supervised or observed by others.

Think about the realities of the situation and reasonably foreseeable circumstances. For example, even where two colleagues are present they will need comfort breaks and would have to seek help if an accident occurred which could leave one alone.

When carrying out the risk assessment, the terms 'frequently' and 'intensively' relate to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.

c. Identify any potential risk areas and detail action to prevent the risk occurring

Once risks have been identified work should commence to mitigate or prevent them. Risks can be minimised either by preventing the situation from occurring at all (re-design the activity) or by taking steps to mitigate the risk (e.g. add extra safeguards).

Multiple safeguards could be applied to an activity. For example, if a colleague is 1-1 with a student under 16 consider:

- i) Is there a way to prevent this?
- ii) If it is unavoidable, another colleague should be informed the meeting is taking place
- iii) And/or another colleague should attend
- iv) And/or the meeting should take place in a public space or with the door of the room open (assuming the interior could then be observed by passers-by)

d. Identify any situations where a Disclosure and Barring Scheme (DBS) check might be required.

There may be situations where the risk cannot be fully mitigated with precautionary measures and in this case, it may be necessary for the person who will spend time with the child, young person under the age of 18 and / or adult in a vulnerable situation or at risk to be subject to a disclosure from the Disclosure and Barring Service (DBS).

Advice related to the requirement for a DBS check for specific roles should be sought from colleagues in HR via HRAdvice@Salford.ac.uk

e. Record findings

A copy of the risk assessment form must be kept on file for future reference or use and a copy provided to the Head of School or line manager. It is good practice to review the assessment from time to time and at least annually, in addition to any circumstances or situations which are likely to or have changed. The assessment should be signed and dated following any review and / or update.

Annex D: Student Admissions to programmes requiring DBS checks

For students applying for courses requiring a DBS check, the relevant School (or Professional Services) Admissions Panel will meet as required during the admissions cycle. This will include:

- Dean or Deputy Dean of School/ Director of Professional Service
- Director of Admissions/ Associate Director of Professional Service
- School Operations Manager / colleague nominated by Director
- Regulatory Body Education Manager / DBS Administrator
- Academic colleague who is a registrant with a professional/regulatory body from relevant profession of cases being considered

The Admissions Panel will follow the relevant Professional Bodies' 'Fitness to Practice / character information guidelines' and will apply the following criteria when considering entry onto programmes requiring DBS/Health clearance/any other declared information:

- Nature and gravity of the offence(s)
- Age and time of the offence
- Length of time since the offence
- Number of offences
- Any pattern of offences
- The Nature and gravity of the offence(s)
- Age at the time of the offence
- Length of time since the offence
- Number of offences
- Any pattern of offences
- The severity of the sentence
- Relevant of offence to profession
- Applicants' response to offence and rehabilitation
- Public trust
- Rehabilitation of Offenders Act (1975) and related guidance
- Report from Programme Leader of students who are not fit to train
- Circumstances regarding any child/children placed upon a child protection register, a child protection plan or placed in care

The applicant should contact the DBS immediately if they believe the information on the DBS certificate to be inaccurate and notify the Admissions Panel as soon as possible. The onus is on the student to resolve the situation with DBS.

The Admissions Panel will notify the applicant of the decision in writing, within seven working days of the meeting. If criminal proceedings have not yet been completed, the Admissions Panel can suspend an applicant's entry to the programme pending the outcome of the case. If an ongoing health issue is under review the Admissions Panel, on advice from the Programme Leader, can suspend an applicant's entry to the programme pending the outcome/management of treatment.

If there is a previous or ongoing issue with regard to whether any child/children in an applicant's care (or household in which they live/lived) have been placed upon a child protection register, been subject to a child protection plan or placed in care and the nature of these circumstances are of a serious nature the Admissions Panel can suspend an applicant's entry to the programme pending further investigation or depending on the circumstances withdraw/cancel an applicant's registration from the University.

The applicant has no right to present their views in person to the Panel (regardless of whether they have already commenced the programme). There is no right of appeal to the Admissions Panel.

Annex E: Code of Practice when dealing with Children, Young People under the age of 18 or Adults in a vulnerable situation or at Risk

This advice relates to University work with children: anyone under 18 years of age and may be a student at the University; or adult in a vulnerable situation or at risk: anyone who is 18 years or over; who is or may be in need of community care services by reason of age, mental illness, other illness or disability; and who is or may be unable to take care of him or herself; or unable to protect him or herself against significant harm or exploitation and may be studying or working at University.

Some activities may occasionally **require individuals** to carry out some of the 'Don'ts' such as physical contact or working in a 1 to 1 situation. Common sense should be exercised as part of undertaking the activity, and discretion applied to ensure any actions are **necessary and appropriate** in line with university policy and guidance. Where possible, **arrangements should be made in advance** for another colleague to be present, or for colleagues to be informed of the event, its location, how long it will last and who is involved.

Colleagues should:

- Ensure welfare of the students (or subjects of the activity) always comes first regardless of aims of activity being carried out
- Keep any relationships on a professional footing, avoiding personal social contact. Personal and professional use of social media must be kept separate. Failure to do so may leave a colleague open to charges of bias (and could lead to disciplinary action).
- Ensure the Salford Behaviours are followed
- Ensure that any accidents involving individuals (whether children, young people under the age of 18 or adults in vulnerable situations or at risk) in their care are reported in accordance with university procedure (or other relevant organisation e.g. school trip).
- Treat all individuals equally and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.
- Be aware of and comply with the Safeguarding Policy and the Consensual Relationships Policy. In particular *"Under the Sexual Offences Act 2003 it is an offence for anyone over the age of 18 working with young people (for example teachers, student mentors, academic colleague etc.) to have a sexual relationship with a young person under the age of 18 who is in full time education."*

Colleagues should avoid:

- Working alone with a child/children, young people under the age of 18 or adults in vulnerable situations or at risk. Steps should be taken to ensure another adult to be present or be in an open or overlooked area. Alternatively, another colleague should be notified and ensure they are nearby. This includes offering lifts to a child.

- Entering children's rooms (bedrooms or changing rooms) unless it is essential. Colleagues should take particular care and be aware of the child / children's right to safety, privacy and decency if contact of an intimate nature is required. A child must not be invited into an individual's bedroom.
- Taking advantage of the position of trust that exists as a colleague (in relation to any students).
- Behaving in any manner that would leave any responsible person to question the suitability to work with children, young people under the age of 18 or adults in vulnerable situations or at risk.
- Physical contact that could be open to misinterpretation by the child or a third party. Even when applying first aid colleagues should use discretion to ensure contact is necessary and appropriate.
- Conferring special attention and favour upon a particular individual or group of students or act in a manner that could be open to misinterpretation.
- Using or allowing others to use over familiar or sexually suggestive comments, inappropriate language or behaviour
- Sharing personal contact information with a student/s (phone number/social media/email)

Annex F: Safeguarding Guidance for providing Remote Learning

This guidance has been written for colleagues in response to the increase in remote and blended learning that has taken place since the covid-19 pandemic. It is recognised that remote working, if not carried out appropriately can place colleagues and students at greater risk. The following guidance should be reviewed and acted upon where any form of remote contact with students is being planned.

NB: All guidance is additional to any requirements identified through the risk assessment undertaken for all teaching of young people under the age of 18. In the event of any conflict the requirements of the risk assessment for the programme of study take priority.

Before starting

- Read the University Safeguarding Policy
- If not already done so, complete the 'Inclusive, Cohesive and Safe HE Campuses' e-learning module within the eLearning dashboard (HR can advise as required)

When planning teaching

- Only use online platforms that have been approved by the University. At present these are Blackboard, Collaborate and Microsoft Teams.
- If the syllabus contains content which is likely to be upsetting or disturbing, especially to students under the age of 18 who may not yet be equipped to deal with such content, this should be the subject of a risk assessment with appropriate mitigations in place to manage any risk.

General advice for teaching and communication with students

- Ensure privacy settings are set so that any personal information cannot be viewed by students
- Ensure the time of any communication is appropriate. Contact of this nature should not take place out of 'normal hours' (these may differ across programmes)
- Keep clear boundaries:
 - a. Only use university email to communicate with students.
 - b. Do not communicate with, organise teaching sessions or hold 1:1's with students using personal social media accounts.
 - c. Do not follow students or request them as friends on social media.
 - d. Carefully consider any personal information shared with students for everyone's benefit
 - e. As far as possible minimise appearances from members of personal households
 - f. If working from home, blur your background or limit visibility of any personal spaces
 - g. Ensure the [University guidance around use of personal social media](#) is understood and followed

Specific guidance for managing one to ones:

- Only use University approved platforms for these interventions. At present, the advice is to use Microsoft Teams for 1:1's.
- If a 1:1 session is required to be recorded for any reason, this must be agreed with the student. Advice should be sought from Digital Skills before recording any 1:1 session with students. They can advise on the safest and most efficient way to do this.
- Agree what the contact will cover at the start. Give the student space and time to add anything additional that may be causing them concern.
- Set time parameters for the contact and do not go over these unless there are concerns about the student, or they disclose a safeguarding issue.
- If a conversation starts to move in a direction that feels too personal, end the contact (unless there are concerns about the student's safety or welfare)
- If the student discloses a safeguarding issue, keep a clear written record of what has been said and any action taken (with the direction of a Designated Safeguarding Officer) as per the Safeguarding Policy (see page 26).

Annex G: Guidelines on recruitment, assessment and employment procedures in relation to safeguarding vulnerable groups

The most likely circumstances in which the University will employ a young person under the age of 18 are through one of its various trainee and modern apprenticeship schemes. However, potentially a young person under the age of 18 may be employed in any of the University's more junior roles.

a. Legal duties

There are several restrictions affecting the employment of children and young people (i.e. those under 18 years of age), mostly relating to health and safety, working hours and training. Under the **Employment Rights Act**, an employee aged 16 or 17 has a right to take time off work for study or training which leads to a relevant qualification. The amount of time that may be taken is that which is reasonable, taking into account the nature of the training or study and the needs of the employer.

Under the **Working Time Regulations 1998** young people employed as young workers are entitled to:

- A health and capacities assessment before being required to perform night work, and periodically thereafter
- A minimum daily continuous rest period of 12 hours
- Two days in every seven off per week (these will usually fall on the weekend)
- A minimum 30-minute rest break after 4½ hours of continuous work

The **Working Time (Amendment) Regulations 2002** give further protection to those aged 16 and 17:

- Working time is limited to 40 hours per week
- The maximum working day is eight hours
- Night working is prohibited under normal circumstances, but exceptions are allowed for certain sectors and circumstances

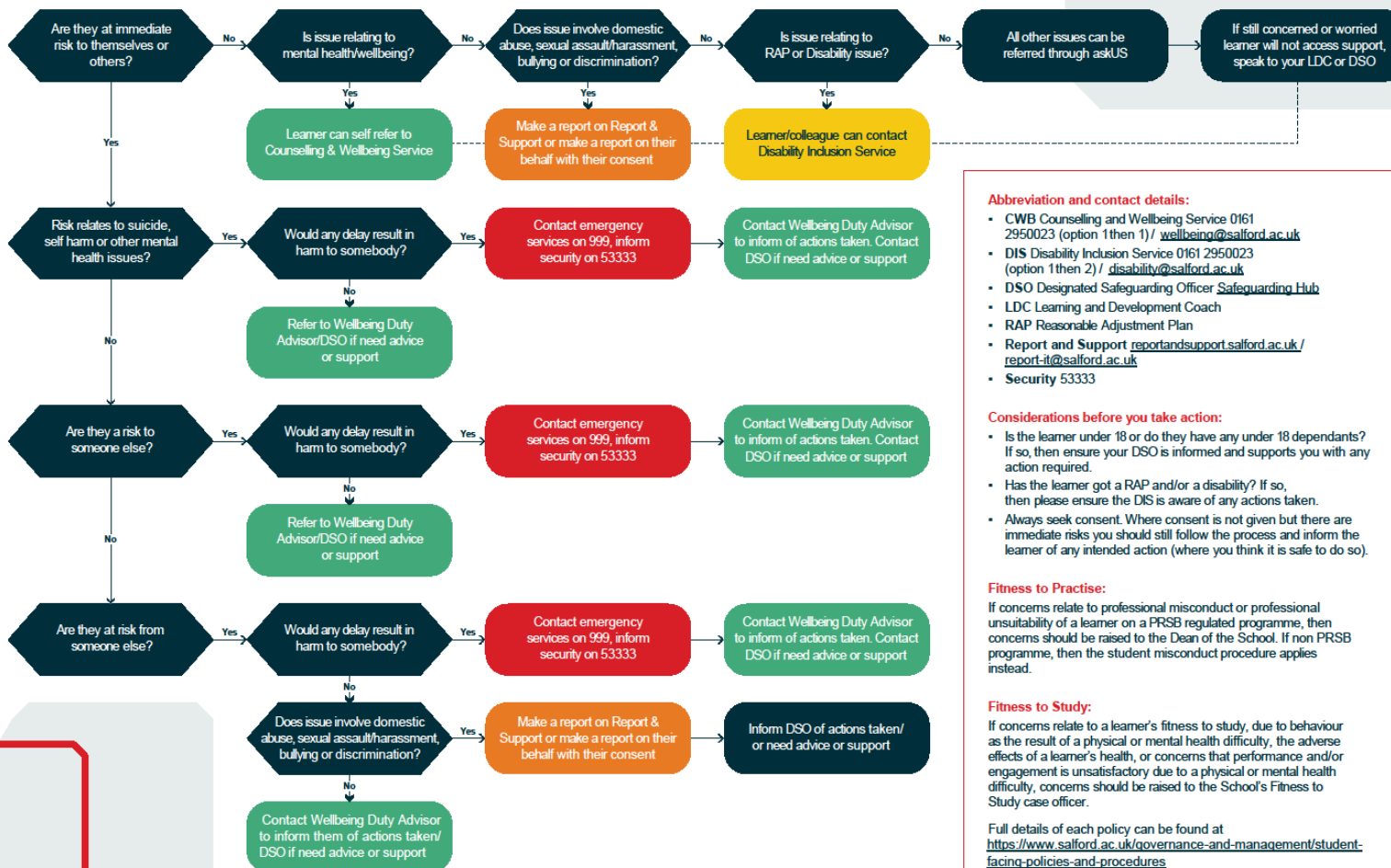
Under the **Management of Health and Safety at Work Regulations 1999**, employers must ensure that young persons are protected at work from any risks to their health or safety because of their age and inexperience, and must not be given work, which is beyond their physical or psychological capacity. Before a young person can start work the employer must carry out a risk assessment to include:

- Their inexperience, their absence of awareness of existing or potential risks, and their immaturity
- The fitting out and layout of the workplace and the workstation
- The nature, degree and duration of exposure to physical, biological and chemical agents

Annex H: Learner Risk Flow Chart

CONCERNS ABOUT A LEARNER

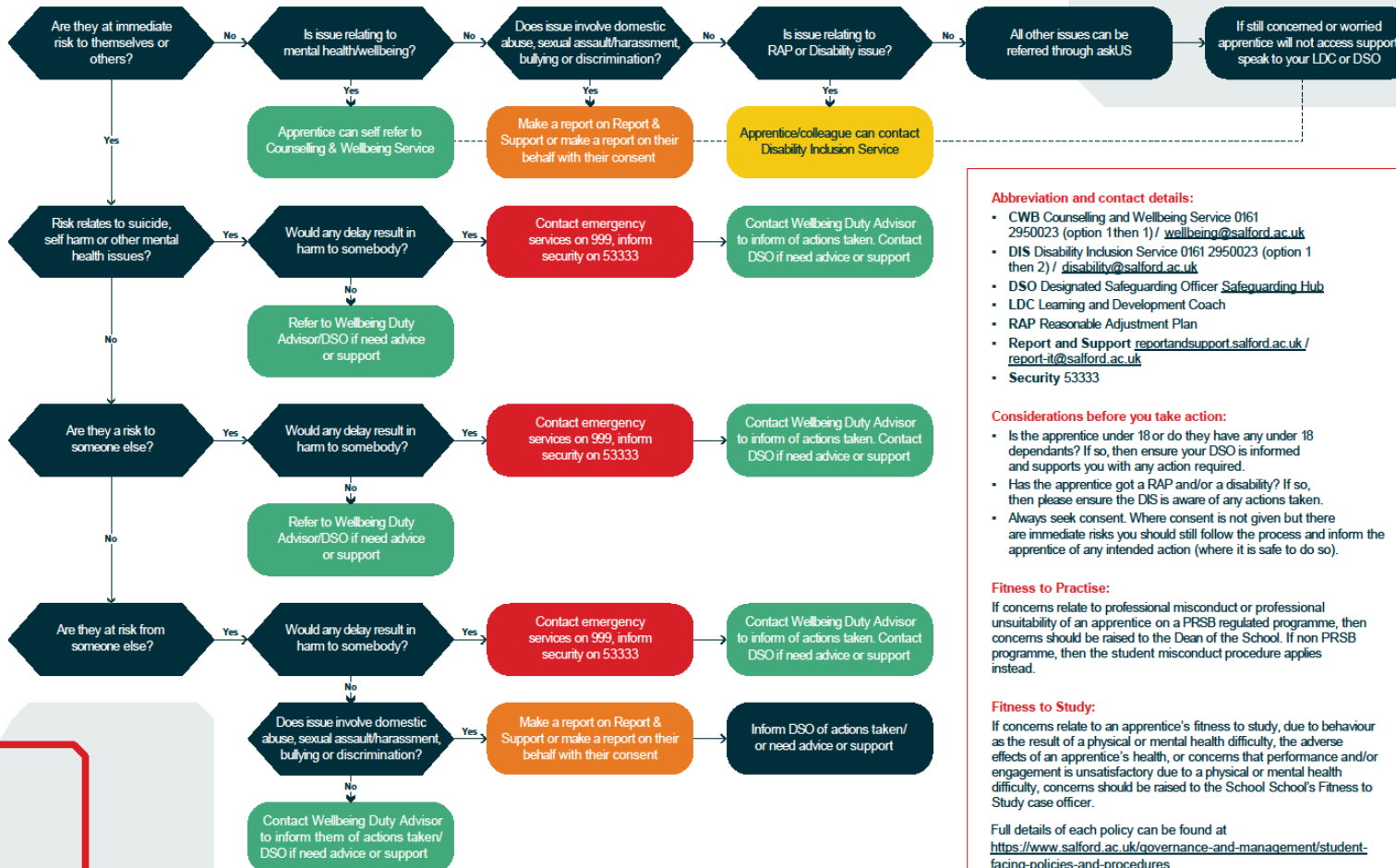
Learner Risk Assessment Flow Chart



Annex I: Apprentice Risk Flow Chart

CONCERNS ABOUT AN APPRENTICE

Apprentice Risk Assessment Flow Chart



Annex J: Prevent Referral Guidance

V2 30 October 2023

This guidance has been developed to help colleagues who have concerns that a student may be vulnerable to radicalisation or may have been radicalised. We have a duty to ensure we are supporting these students and where necessary, referring to our local Prevent Teams to assess the risk associated with individuals. This guide aims to support understanding around the process of referring concerns and what happens once a referral has been made.

What to do if there are concerns a student is being radicalised/is vulnerable to radicalisation

These concerns should be referred to the Prevent Lead or Prevent Officer via the Report-it mechanism via <https://report-it.salford.ac.uk/>.

Individuals are asked to provide as much detail as possible to the report, including what has caused the concern, any evidence which exists, and any actions already taken. The student's full name and student number must be provided along with the reporters' full name and contact details as it is likely the Safeguarding Manager or Prevent Officer will make contact to discuss the referral.

What happens once a referral has been made?

The referral will be picked up by the Student Cases, Conduct and Safeguarding Team to assess. It is likely they will need to discuss the concerns and may require further information. Once all the information is gathered, the Student Cases, Conduct and Safeguarding Team may need to discuss the case with the Safeguarding and Prevent Steering Group (or members of) or the local Counter terrorism contact, who will decide on next steps. The likely outcomes include:

- Support the student internally – This could involve discussing the concerns with the student and referring them for support from internal university services such as wellbeing. This option will be considered where the Safeguarding and Prevent Steering Group or the Prevent & Safeguarding Lead/ Officer believe there is no clear Prevent/radicalisation concern. The Safeguarding Manager or Prevent officer will discuss next steps with the reporter.
- Referral to external support/services – Where the student's needs cannot be fully met within our internal services, external options may be considered. This could be through initial referral to internal services such as our wellbeing team, who can support the student to access external support or directly through the Safeguarding Manager or Prevent officer.
- Referral to Prevent – Where the Safeguarding and Prevent Steering Group or Prevent Lead/ Officer have concerns that a student may be vulnerable to radicalisation or may have been radicalised, a referral to Prevent will be completed. This may result in a referral to Channel, who can offer support to the student. Where referrals are not picked up by Channel, the Safeguarding and Prevent Steering Group will inform the reporter and will discuss next steps. This may include putting an action plan in place, to ensure that the

student is receiving support, and that the situation is being monitored (if this is appropriate). If further concerns are raised, a further referral to Prevent may be considered.

Review – The Safeguarding and Prevent Steering Group will review cases at 3, 6 and 12 months on all cases, whether or not has been referred to Prevent. This is to ensure that cases are considered over a period of time and any changes monitored. Most cases will not be closed until after 12 months and only when no further concerns have been raised. If the Safeguarding and Prevent Steering Group feel there are no issues and the student is not vulnerable or in need of support, the case will be closed immediately.

The review process will include contacting key people working with the student, which may include the referrer and any services the student has been referred to. Tutors and Student Progression Administrators may also be contacted so the Safeguarding and Prevent Steering Group can get a better picture of how the student is engaging on their course/with the university. Cases will be discussed at Safeguarding and Prevent Steering Group meetings and if appropriate, actions will be agreed and shared with key people/the referrer where necessary.

Key colleagues involved in Prevent within Salford

Safeguarding and Prevent Steering Group

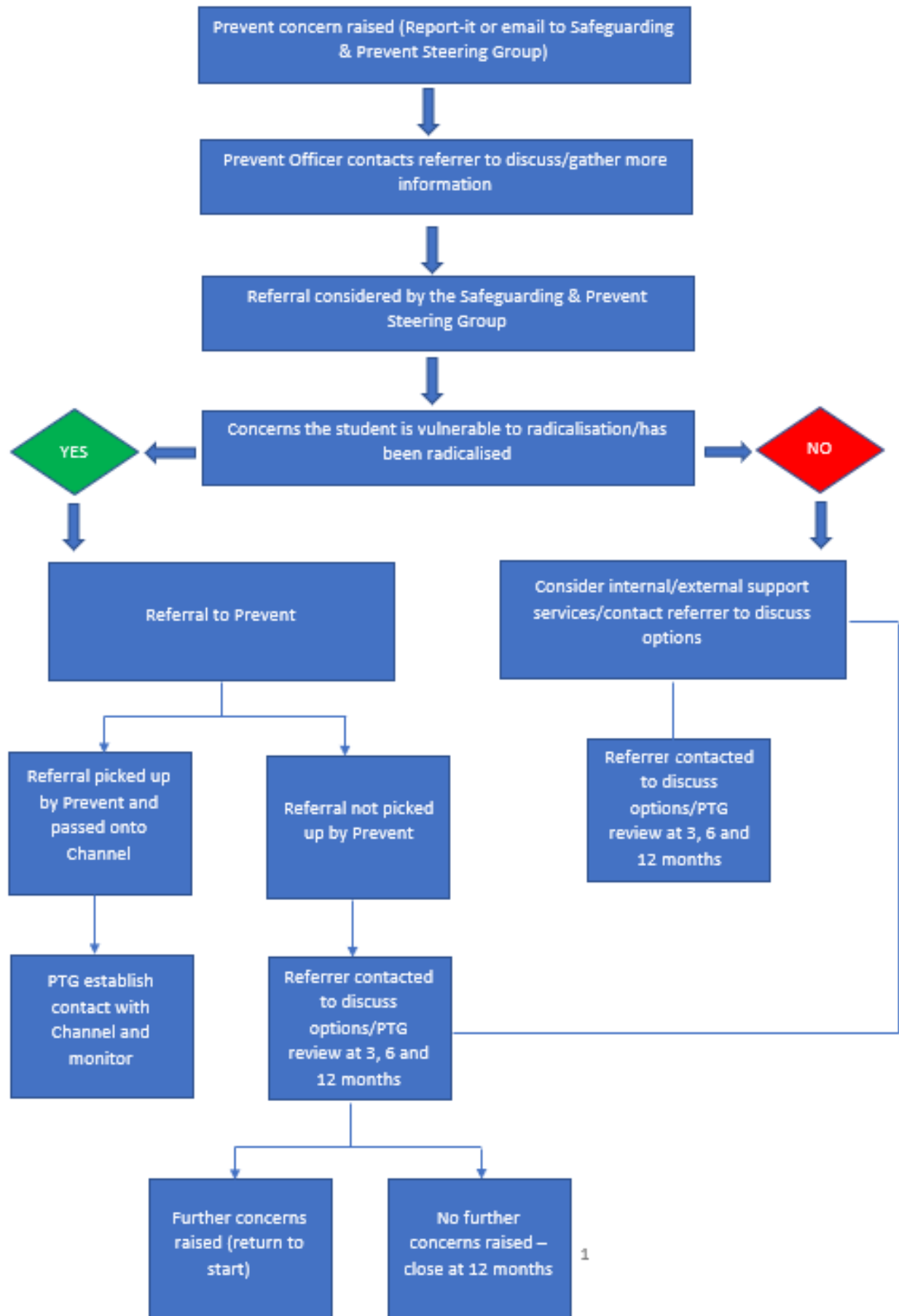
The Safeguarding and Prevent Steering Group is made up of Salford colleagues from key services within the university including Wellbeing, Safeguarding and Security. The group meet regularly to discuss all safeguarding and Prevent related issues, develop policy and practice and consider any Prevent referrals that have been made internally.

Designated Safeguarding Officers (DSOs)

Designated Safeguarding Officers (DSOs) are the first port of call for any colleagues who may have concerns that a student is vulnerable to radicalisation. There are DSOs in all academic schools and within professional services departments (see the safeguarding pages on the hub). DSOs can discuss any concerns with colleagues and help them decide on next steps.

Prevent Officer / Deputy Designated Safeguarding Leads

The Prevent Officer and Deputy DSL's can support DSOs and colleagues who may have concerns about a student but are unsure if they should make a referral. They can discuss concerns with colleagues to help them decide on next steps and offer support through the referral process.



| Document Control Information | | | |
|---|--|---------|-----------------------------|
| Revision History incl. Authorisation: (most recent first) | | | |
| Author | Summary of changes | Version | Authorised & Date |
| Anji Gardiner Leanne Kirk | Updates to terms related to those considered under the safeguarding umbrella more broadly. Updates from HR specifically in relation to sections 7 & 8 Updates to changes in staffing and governance structures due to recent portfolio changes. Updates to appendices & annexes General review and format update. EIA completed & approved (EIA2025-05) | V6.1 | Council approval 11/04/2025 |
| Andrew Hartley/ Leanne Kirk | Updates for inclusion of Annex, J, K and L. Updates to links. Policy format update. General Review. | V6 | 22/01/2024 |
| Leanne Kirk/Andrew Hartley/Anji Gardiner | Approved at ULTC. Continuation of V4 work. Inclusion of U18s | V5 | 09/11/2022 |
| Leanne Kirk/Andrew Hartley/Polly Smith | General review, separate definitions of safeguarding relating to adults and risk and children, changed wording of 'vulnerable adults' to 'adults at risk', updating reporting mechanisms (Report and Support) and added role of Lead DSO. Some information moved from policy into appendices section. | V4 | 01/09/2021 |
| Leanne Kirk | Amended Deputy Designated Safeguarding Lead email address pg22 | V3.4 | 18/03/2020 |
| Leanne Kirk | Amended safeguarding proforma | V3.3 | 16/03/2020 |
| Leanne Kirk | Amended named contact for Deputy Designated Safeguarding Lead and added safeguarding email contact | V3.2 | 09/03/2020 |
| Craig Best | Amended name contact for Deputy Designated Safeguarding Lead | V3.1 | |
| Dianne Atherton-B | General review, inclusion of former student vetting policy, updated reporting mechanisms | V3 | Approved by VCET 17/09/2019 |
| C. Price | General review, cross reference to Prevent duty and processes | V2.2 | General Counsel: 23/05/2017 |
| C. Price | Includes list of trained DSOs | V2.1 | General Counsel 17/02/2015 |
| M. Rollinson & | Major updates in legislation, vetting requirements and University structures | V2.0 | Ops Board: 10 Sep 2014 |

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| Document Control Information | | | |
| C. Price | Exec: 15 Sep 2014 | | |
| M. Rollinson & | Updates incorporating legislative changes (Independent Safeguarding Authority) | V1.1 | |
| Policy Management and Responsibilities: | | | |
| Owner: | The Head of Student Cases, Conduct & Safeguarding is the Policy owner and is Designated Safeguarding Lead on behalf of the University. Major Policy changes will be submitted to ULT for authorisation and subsequent sign off by ARC and Council. | | |
| Others with responsibilities (please specify): | All subjects of the Policy will be responsible for engaging with and adhering to this policy. | | |
| Author to complete formal assessment with the following advisory teams: | | | |
| Equality Analysis (E&D, HR) Equality Assessment form | 1. <i>EIA2025-05</i> | | |
| Legal implications (LPG) | 2. <i>N/A</i> | | |
| Information Governance (LPG) | 3. <i>Throughout Review</i> | | |
| Student facing procedures (QEO) | 4. <i>N/A</i> | | |
| UKVI Compliance (Student Admin) | 5. <i>N/A</i> | | |
| Consultation: | | | |
| Staff Trades Unions via HR Students via USSU Relevant external bodies (specify) | 1. <i>N/A</i> | | |
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