
Safeguarding and Prevent Policy

Status: Approved

Approval date: September 2025

Review date: August 2026

Audience: Public

Responsible person: Designated Safeguarding Lead

Approved by: Council

Contents

1.0 Introduction	3
2.0 Types of harm	5
3.0 Preventative Action	7
4.0 The Prevent Duty	8
5.0 Roles and responsibilities	9
6.0 Recognising a safeguarding concern	14
7.0 Reporting a safeguarding concern	15
8.0 Safeguarding Team Response	17
10.0 International travel	19
11.0 Definitions	20

1.0 Introduction

The Dyson Institute is committed to safeguarding and promoting the highest standards of welfare of its students and expects all Dyson employees, Community members, and contractors to share this commitment. This policy outlines the Institutes approach to meeting this commitment, through integrating policy statement, training, curriculum, environment alongside monitoring and review, to create a comprehensive policy that not only protects individuals from harm but also promotes a positive and inclusive environment. Safeguarding is everyone's business.

The Dyson Institute understands its duty to fulfil its responsibilities under the Prevent Duty. The Institute also places due regard for its duty under The SEND Code of Practice which sets out the principles, legislative background and processes in place to support young people with SEND (Department for Education and Department of Health, 2015), Working Together to Safeguard Children (2024) and Keeping Children Safe in Education (2024).

1.1 Objectives

The Dyson Institute has a legal responsibility to safeguard and promote the welfare of young people and adults at risk who are its students. The Dyson Institute recognises that safeguarding and issues of abuse and harm are broad and can impact others, such as staff and visitors.

- The aim of this policy is to ensure that all students, staff, visitors, and other stakeholders of the Dyson Institute are safe from harm or abuse.
- This policy sets out our commitment to creating and maintaining an open and positive safeguarding culture; Positive environments where students can flourish and where we are always acting in their best interests.
- Our expectations of staff in relation to their safeguarding responsibilities and Prevent duties.

1.2 Core Principles

- Zero tolerance – any form of abuse or neglect is unacceptable
- Inclusivity – the Dyson institute commits to equality, diversity and a safe learning environment
- Proactive approach – Students and staff will all complete education and training to prevent safeguarding issues
- Accountability – Staff have clear roles and responsibilities for Safeguarding.

1.3 Scope

This policy applies to all staff, students, contractors, and visitors and all activities of the Dyson Institute are within the scope of this policy, whether online, onsite, or away from site.

Safeguarding applies to:

- Dyson Institute students.
- Prospective students engaged in Dyson Institute activities.
- Adults at risk and young people engaged in Dyson institute activities on site or online
- Young people i.e., aged under 18 resident or visiting the Dyson site or accommodation.
- External organisations/individuals the Dyson Institute may engage with during its activities.

1.3.1 Out of Scope

Staff or students who work with children or adults at risk in another organisation whilst representing the Dyson Institute should follow the host organisation's safeguarding policy and procedures.

1.4 Related policies and standards

Dyson Institute and Dyson Technology policy and procedures are also relevant to the implementation of this policy. These policies include but are not limited to:

- Safeguarding Adults at Risk and Child Protection Policy
- Harassment and Sexual Misconduct Policy
- Accommodation Policy
- Staff and Student Relationships Policy
- Reasonable Adjustments Policy
- Freedom of Speech Code of Conduct
- Health and Safety Policy and Standards
- Student Complaints Policy
- Fitness to Study Policy
- Global IT Acceptable Use Policy
- Global Security Policy
- Zinc Network Acceptable Use Policy
- Student Disciplinary Policy
- Global Conflict of Interest Policy
- Global Health and Safety policy and standards
- Whistleblowing Policy
- External Speaker & Events Policy

It is essential that all staff and students are familiar with expectations set out in these policies and conduct themselves in a way that always promotes Dyson values.

1.5 Legislation, Statutory Guidance, and Policy

This policy is based on law, statutory guidance and guidance applicable in England only. The Institute has specific responsibility to protect children who are involved in Institute activities from harm and abuse and fulfils its obligations under Working Together to Safeguard Children (2024) and Keeping Children Safe in Education (2024). This policy should be read in conjunction with the Under 18 and Child Protection Policy.

The Care and Support statutory guidance set out that adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It says that adult safeguarding is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

In a Higher Education context, the term safeguarding is also used more broadly to refer to a general duty of care to members of our community. The Institute prioritises student and staff welfare and the prevention of harm. Our safeguarding information and guidance will be applied, in an integrated way, to support all those who may be vulnerable. Supporting policies, including Dyson Technology policies covering employees are relevant (See section 1.5).

Other areas of legislation are also relevant to the implementation of this policy. Relevant legislation and Guidance include but is not limited to:

- The Equality Act 2010 and Equality Act 2010 (Amendment) Regulations 2023
- Health and Safety at Work Act 1974
- Worker Protection (Amendment of Equality Act 2010) Act 2023

- Data Protection Act 2018
 - Counter Terrorism and Security Act 2015 Counter Terrorism and Sentencing Act 2021
 - Keeping Children Safe in Education 2024
 - Working Together to Safeguard Children 2024
 - SEND code of practice 2024
 - Prevent Duty Guidance 2024
-

1.6 Protocols, pathways and thresholds

The safeguarding team have pathways and protocols for incident and concern responses that facilitate – where appropriate – information and action. These measures arise from the dual status of students, who are students of the Dyson Institute for Engineering and Technology but also employees of Dyson Technology. These protocols and pathways also provide a framework for defensible decision making by the safeguarding team. The protocols will determine threshold decision making for action including referrals. Staff and students are made aware of:

- The signs of abuse or neglect through induction workshops and training
 - Confidential reporting mechanisms are outlined within policy
 - The role of the safeguarding team in handling concerns
 - Escalation procedures for serious cases, involving social services or the police.
-

2.0 Types of harm

We are committed to safeguarding the welfare of everyone participating in our organized activities and providing a safe environment for anyone using our facilities. In discharging our responsibilities, we are mindful of our specific duty of care and legal obligations for children (under the age of 18) and adults at risk of harm, as set out in the Children Act 1989 and 2004, Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and the Care Act 2014. We are also conscious of our role in our local community, and we work with the Wiltshire Safeguarding Vulnerable People Partnership.

Examples of safeguarding issues include but are not limited to:

- Radicalisation and extremism (Prevent Duty)
- Neglect, self-neglect, or self-harm
- Suicidal ideation, planning or intent.
- Bullying and Harassment
- Sexual misconduct
- Online abuse and harassment
- Image based abuse
- Identify fraud and exploitation

A more comprehensive list of safeguarding issues including signs and indicators of abuse or harm is available on the Institute Hub Safeguarding page for staff and students to reference.

The Institute recognises that students with SEND, or other vulnerable students may have additional safeguarding challenges. The above is not an exhaustive list, and it should be noted there is no “complete” list of harms and abuse. Staff are expected to have an awareness of the issues through training, so that they can recognise the potential signs and indicators and take appropriate action in line with this policy.

2.1 Students under 18 years of age

The Dyson Institute may occasionally admit students who are under the age of 18 years at the start of their programme. This is likely to be a temporary situation as the students reach their eighteenth birthday, however, they will be subject to the 'Safeguarding Adults at risk and Child Protection Policy' which must be read in conjunction with this policy.

2.2 Child protection

The Dyson Institute will report any suspicions or allegations of abuse of children to the appropriate Social Services. Any such suspicions or allegations will be reported to the DSL who will contact the appropriate authorities via Wiltshire Multi-agency safeguarding hub (MASH). (Read in conjunction with the Students Under 18 and Child Protection Policy).

2.3 Adults at risk of abuse

The Care Act 2014 sets out local authorities' duties when assessing peoples care and support needs. The safeguarding team will work closely in partnership with the local authority. The Institute's Safeguarding Adults at risk and Child Protection policy details how the safeguarding team approaches students at risk, with particular reference to safeguarding in relation to risk of harassment and sexual misconduct.

It is also important to note that factors or events in a person's life can increase the risk of abuse or harm whether a person is deemed "at risk" or not.

Where these are present, it does not mean a person is being or will be abused or harmed, but staff should be particularly vigilant if they notice signs or indicators.

The factors or events include but are not limited to:

- Homelessness (including temporary).
 - Additional learning needs, including neurodiversity.
 - Minority or under-represented groups.
 - Mental health concerns or conditions.
 - Abuse or harm experienced in the past.
 - Debt.
 - Addiction including substances, gambling.
-

2.4 Bullying and harassment

Bullying and harassment in the workplace is a serious matter which will not be tolerated by the Dyson Institute or Dyson Technology. Employers have a legal responsibility to ensure this does not happen. The Institute's Harassment and Sexual Misconduct Policy details the procedures for disclosing, reporting and responding to these cases and is the primary policy source for procedures related to harassment and sexual misconduct. With regard to students who are under 18 or Adults at risk, the Safeguarding Adults at Risk and Child Protection Policy is also a policy source on harassment and sexual misconduct. The Institute's Respect at Work and Study Policy Statement sets out expectations.

2.5 Online and cyber abuse

The online environment, whilst creating huge benefits and opportunities for individuals and organisations, also poses a

safeguarding risk.

The Dyson Institute recognises that, to effectively safeguard in the online environment, it must have suitable policies and procedures in place that identify and mitigate against risks. Digital risks and mitigations are addressed through Dyson's Global IT Acceptable Use policy and Zinc Network Acceptable Use policy. Filtering and monitoring of IT systems for extreme content that could act as a vector for radicalisation is managed by the Cyber Team.

The Government's proscribed list of terrorist groups or organisations is part of this filtering and monitoring process, as is the search of weapons online across all Wi-Fi networks available to staff and visitors.

The Institute recognises that safeguarding goes beyond technology and applies to the behaviour of those interacting online. With increased reliance on remote learning and working, staff must remember that this policy and the Dyson Institute's expectations regarding conduct, apply to face to face interaction in the physical environment and in online or digital interaction.

3.0 Preventative Action

The Dyson Institute will follow the six Principles of Safeguarding (Empowerment, Prevention, Proportionality, Protection, Partnership, and Accountability) which will inform and guide its approach on a day to day and case by case basis.

3.1 Preventative Action

All students have access to a wide range of academic, professional, and pastoral support. Students, as employees of Dyson Technology Ltd. have equal access to all the employee benefits such as the free and confidential Employee Assistance Programme, on site GP and Mental Health Nurse and Occupational Health amongst other services.

The Institute provides support to any student who may be experiencing emotional and psychological problems and will signpost for clinical and psychological support. Students can self-refer to student support at any time and all students will be invited to a minimum of three student support sessions each academic year. The Institute also supports students who have longer term mental health conditions, physical disabilities and/or learning differences and are able to make reasonable adjustments for these students (See Reasonable Adjustments policy).

The student support pages on the Institute Hub SharePoint provides online guidance for both self-help, and -referrals. The team is committed to promoting and embedding positive physical, mental, social and wellbeing behaviours and activities across the Institute community.

The support above is likely to be sufficient for most Institute students during most of their time on their program. However, some students may have the potential to be/become an adult at risk (either temporarily or permanently) for a variety of reasons and in different situations. The safeguarding team are able to work collaboratively with the local authority for adults at risk with care and support needs (See Section 2).

See section 10.0 for international travel.

4.0 The Prevent Duty

4.1 Regard for the Prevent Duty

The Dyson Institute has a statutory duty under Section 26 of the Counter Terrorism and Security Act 2015, termed “Prevent”, and has due regard to the need to prevent people from being drawn into terrorism. This involves safeguarding individuals from extremist ideologies and radicalisation and promoting British Values (Democracy, The rule of law, Individual liberty, and Mutual respect and tolerance of those with different faiths and values). Our response is managed within our safeguarding framework, including clear referral routes and working in partnership with the Department for Education, police and local authorities.

4.2 Definition of Extremism

The UK government definition of Extremism is the vocal or active opposition to fundamental British values; the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

1. Negate or destroy the fundamental rights and freedoms of others; or
2. Undermine, overturn, or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
3. Intentionally create a permissive environment for others to achieve the results in (1) or (2).

Prevent’s objectives are to:

- Tackle the ideological causes of terrorism, in part by reducing permissive environments.
- Intervene early to support people susceptible to radicalisation
- Enable people who have already engaged in terrorism to disengage and rehabilitate.

This policy must be read in conjunction with the Institute’s Freedom of Speech Policy and IT Acceptable Use policy, for filtering and monitoring.

4.3 Prevent Duty Training

All staff are trained to:

- understand British Values,
- factors that can lead people to support terrorist ideologies including push and pull risk factors
- recognise susceptibility to terrorism the signs of radicalisation and terrorism
- know how to report concerns with mandatory annual refresher training.
- the Safeguarding and Student support teams stay informed about the latest threats and how to address them through partnerships.

The Institute works proactively to foster an environment where individuals feel safe to discuss and explore controversial issues, to help build resilience against extremist narratives. Educate against hate initiatives, training and the student support monthly newsletter promote critical thinking, respect for diversity, and understanding of different cultures and beliefs to help students develop the skills to challenge extremist ideologies.

4.4 Partnership working

The Institute works closely with the Regional Prevent Co-Ordinator for Southwest Counter-Extremism Division to keep up to date with local and national risks and to adjust the Institute's Risk Assessment considering these. The Institute is represented at every DfE Prevent Southwest forum and the team participate in regular training updates through this network. The DSL who leads on Prevent works closely with the Regional Coordinator for:

- Support to address concerns and improve Prevent awareness delivery.
- For support in making a Prevent referral to Channel and ensuring that their professional judgement about whether a referral is proportionate and appropriate.
- For support if the Institute deals with complex radicalisation or terrorism cases involving students or otherwise effecting their setting.
- To engage and liaise with the Institute and police if there were to be any terrorism activity that impacts our setting.
- Virtual training and good practice events and sharing relevant updates in a regional newsletter.

4.5 Prevent Risk Assessment

An annual organisational risk assessment under the Prevent Duty is completed and shared with the Institute Management Board and Council. The Institute follows DfE guidance to protect students from radicalisation through the communication of sources of information to understand and talk about the radicalisation risk to students. The Institute will consult with students on its implementation of the Prevent Duty.

4.6 Data Returns and Accountability

The Office for Students (OfS) oversees the implementation of the Prevent duty in higher education institutions in England. The Institute submits an annual data return and accountability statement, signed by the Council Chair confirming the Institute's compliance.

4.7 External Speakers

As part of the Institute's commitment to the Prevent Duty under the Counterterrorism and Security Act 2015, robust procedures are in place for the assessment and approval of external speakers. These procedures are designed to ensure that all contributions to campus events are consistent with the University's values, uphold freedom of speech within the law, and do not promote extremist views or risk drawing individuals into terrorism. The Institute adopts a proportionate, risk-based approach to managing events, balancing its legal obligations with its commitment to academic freedom, equality, and the welfare of its community. For further information, please refer to the following Institute policies and guidance documents:

- **Freedom of Speech Code of Practice** – outlines the Institute's commitment to lawful free expression and the procedures for hosting events and speakers.
- **External Speaker & Events Policy** – sets out the vetting process for external speakers and events in line with the Prevent Duty.

These documents are available via the Institutes' policy section on the website, upon request from Governance team.

5.0 Roles and responsibilities

5.1 The Safeguarding team

The Safeguarding team is led by the Designated Safeguarding Lead (DSL) and supported by the Deputy Designated Safeguarding Lead (DDSL), who represents the DSL in their absence. Both the DSL and the DDSL act as the Child Protection Officer and Prevent Lead and their respective deputies. The safeguarding team also has Safeguarding Officers (SGOs), who work with student cases, referring to the DSL or DDSL for decision making.

5.2 Institutional responsibilities

The primary responsibility of the Dyson Institute is to create and maintain a culture of safeguarding, this includes:

- Always acting in the best interests of students to protect them online and offline.
- Identify students who may need early help (student support), and who are at risk of harm or have been harmed.
- Securing the help that students need and, if required, timely referral to partners
- Managing safer recruitment (including three-year DBS checks) and allegations about adults who may be a risk to children and vulnerable adults.
- Ensuring that all staff maintain a safeguarding attitude of 'it could happen here'.
- Keep policies and practice under review, responding to changes in legislation, regulation, and guidance from appropriate external agencies.

All members of the Dyson Institute community are responsible for:

- Protecting and promoting the safety and welfare of young people and adults at risk
- Avoiding any behaviour or conduct that poses a risk of harm to these groups.
- Reporting concerns about the safety or wellbeing of a young person or adult at risk, or about the suitability of an adult towards young people or adults at risk, to the DSL without delay
- Contacting the emergency services via 999 in the event of an emergency, and informing security and the DSL of this immediately

All staff are responsible for:

- Being aware of the safeguarding policies pertinent to their role
- Reporting safeguarding concerns to the DSL
- Completing the relevant Safeguarding training pertinent to their role and annual refresher training
- Being fully aware of the contents of other relevant policies (see above)

The Safeguarding Team are responsible for:

- Monitoring the welfare of students who are under 18.
- Receiving, assessing and responding to safeguarding concerns and incidents.
- Ensuring safeguarding concerns are reported to the DSL
- Undertaking safeguarding training
- Monitoring safeguarding training of the team and student support team (SST)
- Ensuring safeguarding records are confidential, factual, correct and up to date, clearly indicate decisions made, by

whom, and actions taken.

The Designated Safeguarding Lead is responsible for:

- Reporting to and supporting the Institute Management Board (IMB) about safeguarding matters (including monthly anonymised report on cases, trends, staff training compliance and national threat level).
- Quarterly reports to Council.
- Reporting to Wiltshire MASH and LADO (Local Authority Designated Officer) where an allegation involves a student or employee is under the age of 18; to the adult social care department where an allegation involves an adult at risk.
- Monitoring, promoting, and reviewing the policy, guidance documents and resources.
- Ensuring the dissemination of the policy to all Institute staff through training, online resources, boards, and stakeholder meetings.
- Acting as the first point of contact for safeguarding concerns and providing support.
- Provide support to and dealing with any queries from students or staff who have been accused of misconduct relating to a safeguarding issue.
- Keeping records of all safeguarding referrals and outcomes in line with GDPR and the Data Protection Act 2018 principles and guidance, ensuring secure and responsible data management.
- Working collaboratively internal and external stakeholders

The Institute Management Board (IMB) are responsible for:

- Supporting the DSL to ensure that policies, procedures, and systems relating to Safeguarding are fully implemented and followed throughout the company.
- Liaising with the Council's strategic sponsor.
- Allocate sufficient resources and time to effectively uphold Safeguarding and Prevent commitments.
- Lead by example by demonstrating conduct that promotes and maintains a safeguarding culture.

HR and Safeguarding

- The Institute community is supported by HR resource provided by Dyson Technology. When it comes to Safeguarding our learners, HR have an adjacent role but are not directly involved in the discharging of Safeguarding support and interventions.
- During any period where the Institute is actively safeguarding an individual, the Institute maintains the right to inform HR where it is deemed necessary and/or important to the Safeguarding of the individual or wider community. The decision to inform HR is in the purview of the Director, or in their absence, the IMB member supporting the DSL, on a case-by-case basis, and at a point in time where it is judged to be appropriate. The disclosure of sensitive information will be taken using a risk-based approach.
- Consideration should be given to whether the sharing of information can support the duty of care and the Institute's safeguarding obligations. Such considerations should include:
 - whether the information to be shared is necessary and proportionate
 - that the information is relevant, adequate and accurate, and shared in a timely manner –

cases involving children and young people must be given priority and treated as a matter of urgency

- that any information sharing, and associated record-keeping, is conducted securely and safely
 - It is agreed by both the Institute and Dyson Technology that there is a requirement for mutual reciprocity in the appropriate sharing of information which may help the safeguarding of individuals. Dyson Technology and HR will use their own codified risk-based approach to the decision to share information relating to individuals or the business, which may impact the Institute's need or ability, to deploy safeguarding interventions.
-

5.3 Training and Support

Ensure that all senior leaders, managers safeguarding officers and student support team have completed Safer Recruitment Training.

Students

- All students complete Safeguarding and Prevent training during induction and are given information on how to access internal and specialist external support agencies.
- The students engage in a curriculum which includes but is not limited to drug and alcohol awareness, consent matters, tackling harassment, bystander training, single comprehensive source of information on harassment and sexual misconduct, and sexual health. (The primary source in relation to training related to harassment and sexual misconduct incidents is found in the 'Harassment and Sexual Misconduct Policy').
- These messages are reinforced to students at regular intervals during their programme, for instance, during meetings with the SST, Student Support monthly newsletter, Workshops and Personal and Professional development days and awareness campaigns including resources of leaflets, screens, MS Teams messages and posters.

Institute Staff

- All Institute staff are expected to complete the in-house Safeguarding and Prevent training, this must be completed within their induction if working in a position of trust, and online annual refreshers thereafter.
- Student-facing staff will be trained to recognise symptoms of mental health crises and trained to know what to do next to obtain support for the student and remove additional stressors such as deadlines. Staff should be reminded that where a student has a severe or urgent condition, reasonable adjustments may be made without a diagnosis or medical or expert evidence.
- All Institute staff are expected to complete Harassment and sexual misconduct training and refresher training thereafter. (The primary source in relation to training related to harassment and sexual misconduct incidents is found in the 'Harassment and Sexual Misconduct Policy').

Workplace staff

- All workplace line managers and technical mentors are expected to complete online Safeguarding and Prevent training pertinent to their role, or refresher training depending upon their training status when students commence their rotation under their support. This is available via Dyson Learning and will be assigned to them by the Undergraduate Experience Officer (UEO) and monitored by their line managers and the UEO. Data on training compliance is shared with IMB monthly.
- Line managers and technical mentors are expected to complete the training prior to a student joining them on their rotation.

Hangar Sports Staff

- All 'Hangar' staff are expected to complete in-house online Safeguarding and Prevent training pertinent to their role, including annual refresher training. This is available via Dyson Learning and will be assigned to them by the Undergraduate Experience Officer (UEO) and monitored by their line managers and the UEO.

Security Staff

- All security staff which work on sites where student's complete workplace rotations are expected to complete online safeguarding training pertinent to their role, and annual refresher training. This is available via Dyson Learning and will be assigned to them by the Undergraduate Experience Officer (UEO) and monitored by the UK Security manager and the UEO.

Student Support Team

- All Student Support Advisors (SSAs) must complete level 3 safeguarding course to support students in an Early Help capacity.
- Identified members of the SSA team will be trained specifically as Sexual Violence Liaison Officers (SVLO) to support students involved in cases of sexual misconduct.
- All SSAs are trained in Mental Health First Aid.
- All SSAs are trained in Suicide Intervention and safety planning.
- All SSAs have regular training to enable support for low level concerns.

Safeguarding Team

- All safeguarding officers (SOs) must have completed a Level 3 Safeguarding course prior to commencing their role.
- All SOs are expected to complete the online Home Office Prevent training 'Prevent duty training: Learn how to support people susceptible to radicalisation' Course 1 Awareness and Course 2 – Referrals Course. And Home Office annual Refresher awareness course.
- All SOs are to complete a minimum of 8 hours per year of relevant CPD, of which a minimum of 50% should be face to face training.
- All SOs are to complete training to ensure that they can respond effectively to trends, such as self-harm interventions and understanding suicide interventions.
- Safeguarding Team CPD records will be monitored by the DSL.

6.0 Recognising a safeguarding concern

6.1 Signs and indicators of abuse or harm

Abuse or harm is not always easy to recognise. There may sometimes be physical indicators such as injury, but this is not always the case. Moreover, not all injuries should be taken as indicators of a safeguarding concern.

The individual may find it difficult to talk about their experience. This may be due to a number of complex factors such as:

- Not recognising there is an issue/they are being abused or harmed.
- Not having an opportunity to tell someone.
- Fear of making things worse.
- Fear of being judged.
- Not being able to talk about it or communicate.
- Feeling there is no one they can talk to.

It is important that staff remain approachable and vigilant for possible safeguarding and prevent concerns, maintaining an 'It could happen here' approach.

When considered together, the following can help to create an overall picture as to whether there is potentially cause for concern:

- What you see: There are not always physical signs, but you may notice bruising, cuts, sudden or dramatic change in appearance (unkempt).
- What the individual (e.g., student) says: e.g., they may directly tell you about abuse, harm or radicalisation they are experiencing; what they say may contradict how they are behaving.
- The individual's behaviour: e.g., someone usually open and confident or friendly becomes withdrawn, angry, quick tempered. Not just on the odd day but frequently.
- What others say or notice: e.g., have others noticed or mentioned anything that causes concern?
- How the individual is interacting with those around them: e.g., are there any particular people or events that trigger the behaviour? are they being excluded from groups or bullied?

We can all change our patterns, schedules, demeanor, and responses from time to time. A change in behaviour does not necessarily indicate abuse or harm, so it is important not to make assumptions. It is good practice, in the first instance, for a welfare check-in with the individual.

6.2 Safeguarding matters vs. low level concerns

It is important to distinguish between a safeguarding matter and other matters known as 'low level concerns.

Safeguarding matters are usually where you have reason to believe a young person or adult is being harmed, abused, or exploited or is at risk of being so. We refer to safeguarding matters as allegations, disclosures, and concerns. They are not mutually exclusive, see definitions section 11:

If you are unsure whether a matter is safeguarding or a low-level concern, speak to a member of the Safeguarding team, or submit a safeguarding report (see section 7). The principle “if in doubt, check it out” applies.

Low level concerns should not be ignored, but they will usually be followed up via the (SST). All reports to the safeguarding team will be identified as safeguarding or low-level concern. The DSL will make a defensible decision through professional judgement and consultation with the safeguarding team, a member of IMB or an external partner as required. Low level concerns are monitored and reviewed to ensure that the most appropriate and timely response and offer of support is provided to the student, if the matter escalates the SST will refer into safeguarding.

7.0 Reporting a safeguarding concern

7.1 Know the Immediate or emergency response required. or emergency response required.

Where immediate or emergency action is required to secure the safety or welfare of young people or where police assistance is required, such action should not be delayed by speaking to the DSL or member of the safeguarding team. Contact the emergency services and notify security of your actions.

7.2 Guidance on receiving a Disclosure: Respond, record, refer

If a student or staff member approaches you to discuss a safeguarding concern, you should observe the following approach:

- Listen carefully.
- Accept what has been said without judgement.
- Don't investigate yourself, you can ask clarifying questions only.
- Never promise secrecy, confidentiality is about sharing only with those that need to know.
- Show empathy but try not to let your emotions show.
- Assure the person they have done the right thing to tell you.
- Explain that you will need to tell an appropriate member of staff, and the next steps that you will take.
- Write down a record of the allegation or disclosure as soon as possible including time and date, using the person's own words where possible.
- Send the report securely to Safeguarding portal or to DIETsafeguarding@dyson.com
- Once it has been sent, destroy your record copy securely.
- Let them know a member of the safeguarding team will respond to the notification.

7.3 Sharing information

If you have a safeguarding or prevent concern, you should speak to a member of the Safeguarding Team as soon as possible. Safeguarding concerns must be kept confidential, only sharing relevant information with authorised staff.

Raise your concern via:

- The Safeguarding Portal which is linked [here](#)
- Confidential email can be sent to DIETsafeguarding@dyson.com.
- In person with a SO in D5, Malmesbury campus or on MS Teams when showing as available.

You may speak to any member of the Institute staff, including the student support advisors for support in making the report or disclosure, they will pass on the concern to the safeguarding team. Please consider confidentiality when using this route.

You should always feel confident in discussing your concerns with a member of the safeguarding team. While a concern in isolation may seem minor, in combination with other observations it can help the Dyson Institute to support an individual in need.

In the case of a low-level concern, you should:

- Speak to the SST who can provide Early Help via studentsupport@dyson.com or see a student support or safeguarding team member in D5, Malmesbury Campus or on MS Teams is showing as available.
- Students can also book in to see a member of the student support team, safeguarding team or sexual violence liaison officer via the one-to-one booking system.

If the DSL is the subject of concern, you should send your report to the Director of the Dyson Institute. The DSL or Director should ensure that HR are informed of allegations relating to staff members, so that the appropriate policies and procedures can be followed, including referral by the DSL to the LADO.

SEND Code of Practice is clear that “Where a safeguarding issue arises for someone over 18 with an Education Health Care Plan (EHCP), the matter should be dealt with as a matter of course by the adult safeguarding team. They should involve the local authority’s child safeguarding colleagues where appropriate as well as any relevant partners (for example, the police or NHS) or other persons relevant to the case. The same approach should apply for complaints or appeals.” For procedures for handling harassment and sexual misconduct matters involving students that are adults at risk, refer to the Safeguarding adults at risk and Child protection policy.

If you have concerns about the way a safeguarding matter you have reported is being dealt with, you should speak to the DSL. If you do not get a satisfactory response, you can report the matter using the Dyson Institute’s complaints policy.

8.0 Safeguarding Team Response

On receipt of a safeguarding report, in all cases the first action is to identify if there is imminent or significant risk to harm, then emergency services are to be contacted. For other cases it's important to gather information on the context, information should be shared in a timely manner, context specific, with the student at the center of decision making. Protocols for different safeguarding incidents and concerns are published on the staff section of the Institute Hub.

- On receipt of a report, the receiving Safeguarding Team member, notifies the team that they are taking the lead on action via the confidential MS Teams channel, using the case reference number.
- A member of the safeguarding team will contact/meet with the student at the centre of the concern as soon as possible on that day, following the relevant protocol.
- An immediate action plan is developed with the student. This will outline the short/medium support objectives and other policies may be invoked such as emergency accommodation policy.
- Where a safety plan is required, this must be completed that day, ideally during the initial meeting, and where necessary a decision taken to inform the trusted contact via the Director.
- All external referrals, including referrals for support or risk assessment input from human resources, will be expedited and must be completed within 72 hours of the report. For further information on referrals see section 8.4 'Referral'
- The safeguarding officer (SO) will initiate appropriate actions and record them within the safeguarding portal. Including incident/concern details, protocol followed, informed decision-making, consent to share information and with whom (referrals), clear actions such as safety planning or external referral references, with record of defensible decision making as required.
- Consent – best practice is that consent should be sought from the individual before sharing information with external bodies. However, obtaining consent **MUST NOT** be a barrier to safeguarding where a young person is being, or is at risk of being harmed, or where failure to report could undermine the investigation, detection, or prosecution of a serious crime.

The Safeguarding Officer (SO), in liaison with the DSL as required, records a defensible decision as to whether it is a safeguarding issue or a low-level concern. Low level concerns will be managed by the SST In the case of a safeguarding report which has potential to impact the wider Dyson Institute or Dyson Community:

- The DSL will be responsible for informing the Secretary & Registrar and Institute Director, or alternative member of the IMB, and where directed, the Strategic Sponsor for Safeguarding & Prevent on Council.
- Where appropriate, initiating the serious incident management plan.

8.1 Outside of 72 hours

In some instances, an Institute Community Support Plan will be required. It is important to recognise that a safeguarding report can have a broader impact on the Institute Community and steps need to be taken to ensure that the health and wellbeing of all those within the Institute is considered and offered support.

- Continuous monitoring will be required to ensure that the support plan remains relevant and suitable for student's needs until the safeguarding record is closed. Each open case will be discussed at the monthly safeguarding team meeting and anonymously reported to IMB monthly.
 - Once the safeguarding report has been resolved, the safeguarding team will identify whether a safeguarding learning review is required and associated action plan developed and shared with the Secretary and Registrar.
 - Council members are kept informed via the quarterly Council meeting, and safeguarding will remain a standing agenda item at Council.
-

8.2 Referral to MASH and Police

The DSL (or a member of the Safeguarding team) will seek advice from the appropriate external body (e.g., adult or child services at Wiltshire Safeguarding Vulnerable People Partnership) and keep accurate records of communications. Guidance for good adult referrals to Wiltshire Adult MASH can be found [here](#). Referral information to Wiltshire SVPP / MASH can be found [here](#). Where information indicates an individual is at risk of immediate harm, it must be reported to the police.

Where there is a duty or informed decision to report the matter to the police, this will be recorded in the safeguarding record, including when and by whom.

Where there is a police investigation and/or criminal proceedings, any internal investigation may be suspended pending the outcome of police investigation. However, HR policies and procedures, where appropriate, will be followed.

9.0 Mental Health and Wellbeing

The Institute is currently developing a mental health and wellbeing strategy 2025-202 for publication in 2025

The Institute recognises that it has an important part to play in supporting the mental health and wellbeing of its students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Institute has a clear system and process in place for identifying possible mental health problems, and different routes to escalate and refer for additional support.

The Designated Safeguarding Lead (DSL) and the Senior SSA are qualified as Mental Health Leads to ensure a strong support system for everyone involved. This collaborative approach is to make a significant difference in promoting a healthy and supportive environment.

9.1 Mental health definitions

Mental health - Refers to a full spectrum of experience ranging from good mental health to mental illness, Student Minds University Mental Health Charter.

Mental ill health is a broader term describing mental distress that may or may not be related to a diagnosable mental health condition, Office for Students.

Mental health conditions are clinically diagnosable. They may be more or less severe, and their treatment pathways vary depending on the condition, Office for Students.

Wellbeing - Encompasses a wider framework, of which mental health is an integral part, but which also includes physical, emotional and social wellbeing, Student Minds University Mental Health Charter.

Mental wellness - is an internal resource that helps us think, feel, connect and function; it is an active process that helps us build resilience, grow and flourish, Global Wellness Institute.

According to the Mental Health Foundation, Factors that affect Mental Health include:

- Biological factors, e.g., physical health, genetics, diet, sleep, age
- Psychological factors, e.g., beliefs, mental health diagnoses, perception, addiction
- Social factors, e.g., relationships, family, culture, work, money, housing

9.2 Self-Help and Talking therapies

Students have access to a bank of online self-help resources.

All first-year students engage with Student Minds 'Look After Your Mate' training to enable them to support their peers and signpost to additional services.

There is no threshold for a referral for a series of clinical support sessions either face to face or on-line.

All students have access to EAP for counselling.

All students have access to SilverCloud Online CBT.

All students have access to one-to-one support and coaching via the SST.

10.0 International travel

There are elements of engineering programmes which may be delivered at Dyson Technology Ltd. sites internationally, and these are considered to add value to students' learning. Where such an international element of the programme is delivered as part of the curriculum, a risk assessment is carried out as standard and Safeguarding is incorporated into the risk assessment at the planning stage. The DSL will develop an annual risk assessment based on the specific cohort's needs prior to departure, including liaising with the Senior SSA to ensure the transferability of reasonable adjustments to international settings—this will include risk assessing adults at risk. Please note, these procedures do not apply to personal or self-initiated trips abroad taken by students outside of the official programme.

No students under the age of 18 are permitted to travel internationally as part of the programme.

Pre-departure briefings and information will provide students with the necessary information to contact appropriate members of staff in the host country and in the UK, should they require to do so. These briefings by the international security team and UK Safeguarding team will also include information on personal security and safety when visiting the specific country. Students will be supported to help ensure their safety and wellbeing whilst abroad.

No trips will be permitted if travel guidance from the Foreign and Commonwealth Office prohibits it.

11.0 Definitions

For the purpose of this policy the following definitions will apply:

Adult at risk	Whilst the Institute is not subject to the provisions of the Care Act 2014, it draws broadly on safeguarding principles with regard to Adults at Risk, to contribute to their rights to live in safety, free from abuse and neglect, and to promote their wellbeing, considering their views, beliefs and wishes, as appropriate in the context of the Institute. Adults at Risk in this policy are defined by the Data Protection Act 2018 being a person over 18 years of age who i) has needs for care and support; and ii) is experiencing, or is at risk of neglect, or physical, emotional or mental harm, and iii) as a result of those needs is unable to protect themselves against neglect or harm, or the risk of it.
Abuse of power	Means a situation where a relevant staff member exploits a position of power in relation to a student so as to apply pressure in a way which: <ul style="list-style-type: none"> • may result in the student doing something, or refraining from doing something, that they may not have otherwise done; and • that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.
Allegation	A claim or belief that any member of the Dyson Institute community may have: <ul style="list-style-type: none"> • behaved in a way that has harmed a young person, or adult at risk or may have harmed a young person or adult at risk. • possibly committed a criminal offence against or related to a young person or adult at risk. • behaved towards a young person or young people, or adult or adults at risk. in a way that indicates they may pose a risk of harm to young people or adults at risk. • behaved or may have behaved in a way that indicates they may not be suitable to work with young people or adults at risk (including conduct in a person's private life, associated with someone who presents a risk to young people or harm to an adult).

Child or children	The statutory guidance 'Working together to Safeguarding Children' defines a 'child' as anyone who has not yet reached their 18 th birthday. The terms 'child' and 'children' or 'young people' and 'young person' will be used to describe those under the age of 18.
Concern	When you are worried about the wellbeing or safety of a child/young person or adult at risk.
Disclosure	When a young person or adult tells you they are being abused, harmed, or exploited by another (not necessarily a member of staff), or at risk from themselves. Examples include expressing suicidal plans or intentions, or information about attempts to radicalise.
First disclosures	Where the victim/survivor tells any third party, in detail, for the first time.
Incidents	Includes, but is not limited to, circumstances where allegations or complaints are made to the Institute about an abuse, harm or neglect e.g. harassment, sexual misconduct, self-harm, online exploitation; and the provider could reasonably be considered to have grounds for suspecting that abuse, harm or neglect has taken place or is taking place.
Low level concerns	Relate to information you receive about an individual or by observing signs or indicators that does not reach the threshold of a safeguarding matter but nonetheless should not be ignored. At the Institute, such concerns might include: <ul style="list-style-type: none"> • Falling behind in work/coursework. • Lack of engagement or interest in others or social interaction. • Feeling frequently tired. Reported health concerns or absence from work.
Position of trust	Any staff member working closely with children, young people or adults at risk is in a position of trust.
Report	Sharing of information with a staff member of the Institute regarding a safeguarding incident experienced by that individual for the purposes of initiating the investigation process by the Institute.
Safeguarding concern	is where you have reason to believe that a young person or adult is being harmed, abused, or exploited or is at risk of being so. You may not have received an allegation or disclosure. Examples include observing signs or indicators such as behaviour, appearance, language, or incidents you have seen.
Safeguarding- The Institute	defines safeguarding as the measures taken to protect the health, wellbeing and human rights of children, young people and adults at risk and enabling them to live free from harm, abuse, and neglect.
Staff	Includes but is not limited to employees and contractors.
Students	Include, but is not limited to, persons who are registered on a higher education course and, at any point in time within the overall duration of that higher education course, are employed by, or otherwise providing services to the Dyson Institute.
Victims and alleged perpetrators	We will avoid the use of the word victim, although it is a widely understood term, not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Therefore, we will make use of the term's 'discloser', 'disclosing individual', 'reporter', 'reporting individual' or 'individual at the center of the concern', or 'reported individual' or 'alleged perpetrator'.