

Safeguarding Policy

Date: 10 June 2026

Last amended by: Tim Johnson

1 Introduction

- 1.1 ThinkSpace Education (TSE) is committed to safeguarding and promoting the welfare of all students and staff. TSE recognises that safeguarding is everyone's responsibility and that promoting the welfare of individuals requires a culture of vigilance, openness, and prompt action.
- 1.2 TSE is an exclusively online postgraduate provider with no physical campus. All teaching, tutorials, webinars, and student interactions take place in digital environments. This policy sets out TSE's approach to safeguarding within that context, including the specific risks associated with online delivery.
- 1.3 All TSE students are adults aged 21 or over. TSE acknowledges that adults can experience abuse, exploitation, and harm, and that some individuals may be particularly vulnerable. The primary safeguarding framework applicable to TSE's students is the adult safeguarding framework under the Care Act 2014. This policy applies to all enrolled students.
- 1.4 TSE's safeguarding arrangements are maintained in coordination with Arts University Bournemouth (AUB), TSE's validating partner. Where a safeguarding concern cannot be resolved within TSE's own processes, TSE will involve AUB and, where necessary, relevant statutory authorities.

2 Scope

- 2.1 This policy applies to all TSE staff (permanent and contracted), all freelance tutors, and all students enrolled on TSE's programmes.
- 2.2 The policy covers all TSE-managed online environments including the VLE, Discord, tutorial sessions, webinars, email communications, and any other digital space used in connection with TSE's programmes.
- 2.3 This policy applies at all times when staff or tutors are engaged in TSE-related activity, including outside normal working hours if that activity involves a TSE student or colleague.

3 What is Safeguarding?

- 3.1 Safeguarding means protecting people from abuse, harm, neglect, and exploitation, and ensuring that individuals at risk receive the support they need. In higher education, safeguarding encompasses:
 - Protection of adults at risk — those who may be at risk of abuse or exploitation due to vulnerability, disability, mental health, or other circumstances
 - Prevention of and response to domestic abuse, sexual violence, harassment, or exploitation
 - Prevention of radicalisation and involvement in extremism (addressed in detail in TSE's Prevent Policy)
 - Protection from online harms including grooming, cyberbullying, and harmful content
- 3.2 Abuse may be physical, emotional, sexual, or financial, and may occur between students, between students and staff, or may originate outside TSE. In an online environment, abuse may manifest through digital communications, content sharing, or other online interactions.

4 The Designated Safeguarding Lead

- 4.1 TSE's Designated Safeguarding Lead (DSL) is Bradley Jordan, who has operational responsibility for safeguarding across TSE. Bradley Jordan can be contacted at bradley@thinkspace.ac.uk.
- 4.2 The DSL's responsibilities include:
- Maintaining and reviewing this policy annually
 - Receiving and assessing safeguarding referrals from staff and tutors
 - Making referrals to statutory authorities (social services, police) where appropriate
 - Coordinating with AUB on safeguarding matters where required
 - Maintaining confidential records of all safeguarding concerns and actions taken
 - Ensuring all relevant staff and tutors complete safeguarding training
 - Reporting on safeguarding activity to the Board of Directors
- 4.3 In the absence of the DSL, safeguarding concerns should be directed to the Head of Postgraduate Education (Tim Johnson, tim@thinkspace.ac.uk) or the CEO (Guy Michelmores, guym@thinkspace.ac.uk). Serious concerns must be escalated immediately and must not wait for the DSL's return.

5 Online-Specific Safeguarding Risks

- 5.1 As an exclusively online institution, TSE is alert to the safeguarding risks that are specific to, or heightened by, digital delivery. These include:

5.2 Grooming and exploitation

- 5.2.1 Online environments can facilitate contact between students and individuals seeking to exploit or manipulate them. Staff and tutors should be alert to signs that a student is being groomed or coerced, including sudden changes in behaviour, references to individuals outside their normal social circle, or expressions of distress around online communications.

5.3 Radicalisation

- 5.3.1 The risk of students being exposed to radicalising content or contact online is addressed in detail in TSE's Prevent Policy. The DSL acts as both the Designated Safeguarding Lead and the Prevent Lead, ensuring a joined-up approach to these related risks.

5.4 Harmful content sharing

- 5.4.1 Students or staff may share, produce, or be exposed to harmful content in TSE's online spaces — including in the VLE, Discord, or during live sessions. This may include violent imagery, extremist material, content that sexualises individuals, or material that causes significant distress. Such incidents should be reported to the DSL immediately.

5.5 Cyberbullying and online harassment

- 5.5.1 Bullying and harassment that occurs through digital channels — including persistent unwanted contact, public humiliation via online platforms, or harassment through messaging — is taken as seriously as any other form of misconduct. Such concerns should be reported under this policy and, where relevant, under the applicable TSE Bullying and Harassment Policy (Students or Staff).

5.6 Mental health and welfare

- 5.6.1 Isolation and the challenges of online study can exacerbate mental health difficulties. Staff and tutors should be alert to signs of distress, withdrawal, or crisis in students, and should refer concerns to the DSL. TSE's response to mental health concerns is governed by TSE's Fitness to Study Policy.

6 Recognising Signs of Concern

- 6.1 Staff and tutors should be alert to signs that a student or colleague may be at risk, including:
- Unexplained changes in behaviour, engagement, or communication style
 - Expressions of fear, distress, or references to harm — whether to themselves or others
 - Unexplained absences or sudden disengagement from studies
 - Disclosures, however partial, of abuse, exploitation, or harm
 - Indicators of domestic abuse, including references to controlling or abusive relationships
 - Sharing of harmful or distressing content in TSE's online spaces
 - Significant deterioration in mental health or expressions of self-harm or suicidal ideation
- 6.2 In an online environment, such signs may be visible in tutorial interactions, written communications, VLE activity, Discord messages, or the content of submitted work. Staff should trust their instincts — a concern does not need to be certain or fully formed before it is reported.

7 Reporting a Concern

- 7.1 Any member of staff or tutor with a safeguarding concern about a student or colleague should report it to the DSL, Bradley Jordan (bradley@thinkspace.ac.uk), as promptly as possible. In an emergency, or where there is immediate risk to life, contact the emergency services (999) first and notify the DSL immediately afterwards.
- 7.2 When reporting a concern, staff should provide:
- The name of the individual about whom the concern is raised
 - A factual description of what was observed, heard, or disclosed
 - The date and context in which the concern arose
 - Any immediate action already taken
- 7.3 Staff should record what they observed using the individual's own words where a disclosure was made, rather than interpreting or paraphrasing. Reports should be factual, not speculative.
- 7.4 Staff should not attempt to investigate a safeguarding concern independently, confront an alleged perpetrator, or promise confidentiality to a student who makes a disclosure.

8 Responding to a Disclosure

- 8.1 If a student or colleague discloses abuse or harm — whether about themselves or another person — the member of staff or tutor receiving the disclosure should:
- Listen carefully and remain calm
 - Acknowledge what is being shared without expressing shock or disbelief
 - Not promise to keep the information confidential
 - Not ask leading questions or press for details beyond what is volunteered
 - Explain that they will need to share the information with the DSL to ensure the person gets appropriate support
 - Make a factual written record of the disclosure as soon as possible and pass it to the DSL
- 8.2 Receiving a safeguarding disclosure can be distressing. Staff should seek support from the DSL or their line manager after managing a disclosure.

9 The DSL's Response and Referral

- 9.1 On receiving a safeguarding concern, the DSL will assess the information and determine the appropriate response. This may include:
- A welfare check or direct contact with the student concerned
 - Internal monitoring and support through TSE's student welfare processes
 - Referral to statutory authorities — social services, local authority safeguarding teams, or police — where there is a risk of serious harm
 - Coordination with AUB where the concern involves the academic programme or requires the validating partner's involvement
 - Referral to the Channel programme where radicalisation is a factor (see TSE's Prevent Policy)
- 9.2 All actions taken by the DSL in response to a safeguarding concern will be recorded in the confidential safeguarding log.
- 9.3 Where a referral to statutory authorities is made, the DSL will normally notify the individual concerned, unless doing so would put them or others at increased risk.

10 International Students

- 10.1 Approximately half of TSE's students are based outside the United Kingdom. UK statutory safeguarding frameworks — including referral routes to local authority safeguarding teams and police — may not be directly applicable to students based abroad.
- 10.2 Where a safeguarding concern involves an international student, the DSL will assess the situation and determine the most appropriate course of action. This may include:
- Contacting relevant authorities or support services in the student's country of residence, where this is proportionate and lawful
 - Seeking guidance from the OfS or from specialist organisations with international safeguarding expertise
 - Involving AUB where appropriate, via aubpartnerships@aub.ac.uk

11 Coordination with AUB

- 11.1 TSE's validating partner, Arts University Bournemouth (AUB), maintains its own Safeguarding Policy. TSE operates its own safeguarding procedures appropriate to its online delivery context, and is responsible for its students' welfare in the first instance.
- 11.2 TSE will notify AUB via aubpartnerships@aub.ac.uk in the following circumstances:
- Where a safeguarding concern results in a referral to statutory authorities
 - Where a safeguarding matter has, or is likely to have, a significant impact on a student's academic progression or registration
 - Where the matter gives rise to reputational or regulatory implications for the partnership
- 11.3 TSE will cooperate fully with AUB's safeguarding processes where AUB is required to be involved by its own regulatory obligations.

12 Confidentiality and Information Sharing

- 12.1 Safeguarding information is held in strict confidence. Access to safeguarding records is restricted to the DSL and, where necessary, the Head of Postgraduate Education and CEO.

- 12.2 Confidentiality cannot be guaranteed in safeguarding situations. Where sharing information is necessary to protect an individual from harm, TSE will share information with relevant authorities regardless of an individual's wish for confidentiality. Staff should make this clear to any student who discloses a concern.
- 12.3 All information sharing will be proportionate, lawful, and carried out in accordance with TSE's Privacy Notice and UK GDPR obligations.

13 Record Keeping

- 13.1 The DSL maintains a confidential safeguarding log recording all concerns received, the DSL's assessment, and the actions taken. Records are retained securely and are accessible only to authorised individuals.
- 13.2 Safeguarding records are retained for a minimum of seven years, or longer where required by statutory guidance.

14 Training

- 14.1 All staff and tutors are required to complete safeguarding awareness training before commencing student-facing activity. Safeguarding training is included in TSE's tutor induction programme.
- 14.2 Refresher training is required every three years, or sooner in response to significant changes to guidance or legislation.
- 14.3 The DSL undertakes enhanced safeguarding training appropriate to their lead role, including training in making referrals to statutory agencies.

15 Monitoring and Review

- 15.1 This policy is reviewed annually by the DSL and approved by the Board of Directors.
- 15.2 The DSL will report to the Board of Directors on safeguarding activity and training compliance as part of TSE's annual governance cycle.
- 15.3 This policy will be updated in response to changes in legislation, statutory guidance, or OfS requirements.

16 Related Documents

- 16.1 TSE policies:
- TSE Prevent Policy
 - TSE Online Safety Policy
 - TSE Bullying and Harassment Policy (Students)
 - TSE Bullying and Harassment Policy (Staff)
 - TSE Sexual Assault and Misconduct Policy
 - TSE Fitness to Study Policy
 - TSE Student Code of Conduct
 - TSE Privacy Notice
- 16.2 AUB policies:
- AUB Safeguarding Policy
- 16.3 Legislation and guidance:
- Care Act 2014

- Counter-Terrorism and Security Act 2015