Wilmington plc

Safeguarding and Prevent Policy

Version 1.2

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Approved By	Esther Osborn **Head of People Operations & Services**
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Safeguarding and Prevent Policy

Safeguarding Policy

All Wilmington employed and contracted tutors and examiners who have primary contact with an individual for supporting and/or managing provision of their programme of study or associated assessment will be responsible for implementation of this policy.

Safeguarding aims to protect the welfare of all learners from harm, which includes physical abuse, psychological abuse, sexual abuse, neglect and acts of omission, financial abuse, discriminatory abuse, modern slavery, domestic abuse, and institutional abuse. This involves putting into place measures to create a safe environment in which all learners can thrive and achieve.

All learners have the right to protection, to be listened to and to have their opinions heard. Wilmington is committed to ensuring all learners undertaking a course of study and assessment have the best opportunity for success in an informed and appropriate environment. Wilmington will ensure that the rights of the learner are respected, regardless of race, gender, disability, religion, sexual orientation, family status, age, and social background.

All Wilmington and contracted tutors will abide by current UK legislation and follow procedures as set out in this policy. It is not the responsibility of Wilmington or contracted tutors to decide or diagnose whether abuse or harm has taken place, however, it is their responsibility to report any concerns, regarding abuse or harm and provide the necessary support for the learner to successfully complete their programme of study and assessment.

All safeguarding issues will be treated as strictly confidential and should only be disclosed to persons who need to be informed.

Prevent Policy

As an education provider, Wilmington recognises its duty of preventing its learners from being drawn into terrorism. We are committed to ensuring that all learner facing employees identify indicators of radicalisation and extremism, promoting British values, and implementing processes to appropriately respond to incidents.

Where we hold Wilmington events utilising external speakers, we will ensure that the content being delivered does not represent or promote extremist views in any way.

All prevent issues will be treated as strictly confidential and should only be disclosed to persons who need to be informed.

It is recognised that many Wilmington students are overseas nationals, living and working outside of the UK. The provisions of this Policy are in the first instance applicable to UK students, but the spirit and principles established will apply to all.

British Values

Extremism is defined as a vocal or active opposition to British values, including:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs

Wilmington encourages its tutors to raise awareness of British values, challenge any form of extremism, and to proactively report any suspected incidents of extremism or radicalisation.

Examples of Safeguarding and Prevent Issues

There are many forms of abuse and neglect, which includes the following but is not exhaustive:

Sexual – for example, trying to get someone to take part in sexual activity by using force, threats or bullying. Sexual activity requires mutual consent to be given and an understanding of what is being consented to. 'Grooming' occurs when a person uses an emotional bond to gain the trust of a child or vulnerable adult to sexually abuse or exploit them, or to trade them (trafficking)

Sexual harassment - unwanted behaviour of a sexual nature which: violates a person's dignity, makes them feel intimidated, degraded, or humiliated

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

Neglect – for example, not caring for yourself or someone you are responsible for. This could include not washing regularly, not eating, or having unsafe living conditions

Physical – for example, hitting another person or deliberately self-inflicted wounds

Psychological – for example, saying things which could hurt someone else, or which could make them feel vulnerable, alone, or isolated. Making threats, trying to control another person, or humiliating someone can be psychological harm. Psychological harm can include bullying in person or online, including 'revenge porn'.

Financial - for example, unreasonable or excessive borrowing or stealing money or other items. Also, trying to pressure someone else into giving you money or other items because they feel sorry for you.

Domestic abuse – typically an incident or pattern of incidents of controlling coercive or threatening behaviour, violence, or abuse by someone who is, or has been, an intimate partner or family member.

Discriminatory abuse – includes some forms of harassment, slurs or unfair treatment relating to race, gender and gender identity; age; disability; sexual orientation; religion.

Indicators of Abuse

- Change in behaviour – especially appearing to be very nervous and anxious, mood swings (tears/anger and aggression), unreasonable/irrational behaviour.

- Becoming quiet and withdrawn.

- Looking unkempt, dirty, or significant loss of weight

- Physically, may have unexplained bruises or injuries, same injuries happening more than once.

- Self-harm or significant changes in emotional well-being, unexplained absences, including persistently being late or going missing, lack of engagement with peers and social groups.

- Sudden changes in finances, not having as much money or getting into debt

Indicators of Radicalisation

Area	Indicator
Peer pressure	Withdrawn
Unsettled family life	Change in engagement levels
Need to belong/fit in	Using extremist language, passionate about extremist views
Accessing extremist material	Preaching
Isolation and social exclusion	Change in appearance – dress/body art
Bullied	Change in behaviour within work or learning environment
Media influence	Change in social circles

Factors contributing to vulnerability

- Rejection by peer, faith, or social group/family
- Pressure from person linked to extremism
- Seeking revenge
- Victim or witness to race or religious hate crime
- Conflict with family over religious beliefs, lifestyle, or politics
- Identity confusion
- Recent religious conversion
- Change in behaviour or appearance due to new influences
- Under achievement
- Possession of literature related to extreme views
- Experience of poverty, disadvantage, or social exclusion
- Extremist influences
- A series of traumatic events, global, national, or personal

Online Safety

Wilmington acknowledges that studying online can present risks and challenges. Wilmington and contracted tutors have a duty to ensure learners are protected from potential harm online and have a responsibility to notice and report any safeguarding concerns around online safety using the [Safeguarding Notification Form](#)

Safeguarding and Prevent Roles

Name	Role	Email
Simone Jones	DSL - Designated Safeguarding Lead	Simone.jones@int-comp.org
Tim Tyler	SL Safeguarding Lead (Teaching Faculty) DPL – Designated Prevent Lead	Tim.tyler@int-comp.org

Emergencies and Out of Business Hours Contacts

If there is an immediate risk of harm or other emergency, you should call 999 and speak to emergency services.

Anti-terrorist hotline: 0800 789 321 – for concerns about possible terrorist activity.
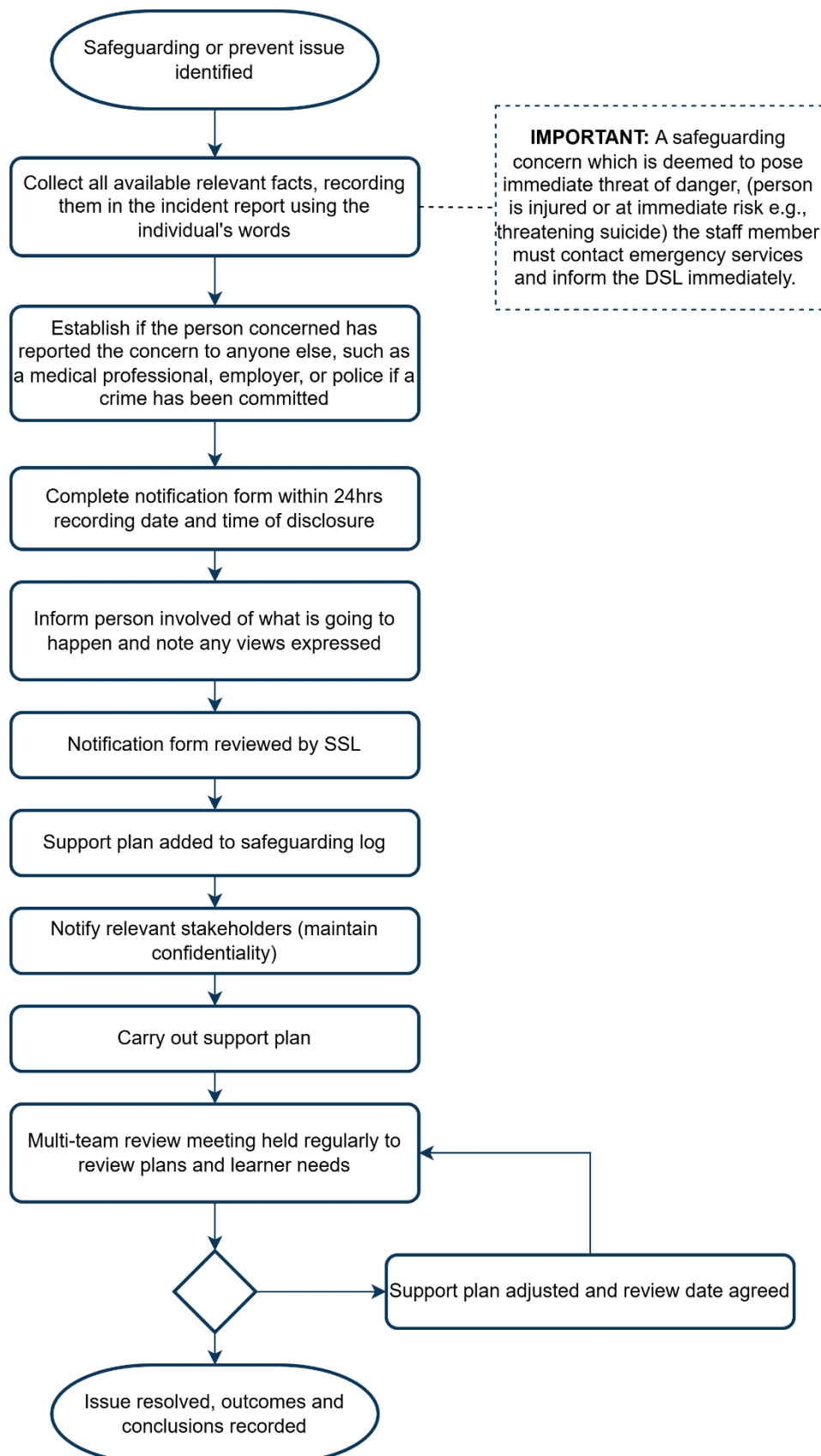
Reporting Concerns

All Wilmington employees **or contracted tutors** have a duty to report any safeguarding or prevent concerns as outlined below in the Safeguarding Assessment Process. Wilmington reporting procedures (all records will be kept confidential):

- A safeguarding concern which is deemed to pose immediate threat of danger, (person is injured or at immediate risk e.g., threatening suicide) the Wilmington employees member or contracted tutor must contact emergency services and inform the DSL immediately.

- A prevent concern which is deemed to pose an immediate threat or danger, the Wilmington employee or contracted tutor must contact emergency services and inform the DPL immediately.

- The DSL / DPL will take responsibility for disclosing any imminent concerns to the relevant emergency services or Local Safeguarding Adult Board (LSAB).

- Any identified safeguarding or prevent concerns must be reported by the relevant person within Wilmington staff within 24 hours using the Safeguarding Notification Form.

- Upon receipt of the notification the SSL will review the notification and compile a Support Plan engaging with the Multi-team Safeguarding Leads as required.

- The SSL will record details of the notification and Support Plan in the Safeguarding Log and set a relevant review date.

- Information regarding the incident will be limited to staff responsible for supporting the learner.   If the incident involves an apprentice, the SSL will have responsibility to notify Main Provider.

- Regular Multi-Team review meetings will be held to review active Support Plans.

- Support plans will remain active until the learner's needs are met and then the Support Plan will be closed.

It is important to note that, when any suspicions or allegations of harm or abuse have been reported to Wilmington, the information obtained may be shared with outside agencies to ensure the safety and welfare of the learner, and to provide the most appropriate care or services needed to protect the individual who may be at risk of harm or abuse.

Storage of information recorded during any investigation/discussions must be always kept confidential by the relevant Wilmington employee. After a case has been closed, records will be held securely, only accessible by the relevant responsible officer.

Safeguarding and Prevent Assessment Process

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        ┌─────────────────────────┐
        │ Safeguarding or prevent  │
        │    issue identified      │
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   ┌──────────────────────────────────┐      ┌─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ┐
   │ Collect all available relevant   │        IMPORTANT: A safeguarding
   │ facts, recording them in the     │- - - - concern which is deemed to pose
   │ incident report using the        │        immediate threat of danger, (person
   │ individual's words               │        is injured or at immediate risk e.g.,
   └──────────────────────────────────┘        threatening suicide) the staff member
                    │                           must contact emergency services
                    ▼                           and inform the DSL immediately.
   ┌──────────────────────────────────┐      └ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ─ ┘
   │ Establish if the person concerned│
   │ has reported the concern to      │
   │ anyone else, such as a medical   │
   │ professional, employer, or police│
   │ if a crime has been committed    │
   └──────────────────────────────────┘
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                    ▼
   ┌──────────────────────────────────┐
   │ Complete notification form within│
   │ 24hrs recording date and time of │
   │ disclosure                       │
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Inform person involved of what is│
   │ going to happen and note any     │
   │ views expressed                  │
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Notification form reviewed by SSL│
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Support plan added to            │
   │ safeguarding log                 │
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Notify relevant stakeholders     │
   │ (maintain confidentiality)       │
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Carry out support plan           │
   └──────────────────────────────────┘
                    │
                    ▼
   ┌──────────────────────────────────┐
   │ Multi-team review meeting held   │◄──────────────┐
   │ regularly to review plans and    │               │
   │ learner needs                    │               │
   └──────────────────────────────────┘               │
                    │                                  │
                    ▼                       ┌──────────────────────────────┐
                  ◇─────────────────────────►│ Support plan adjusted and    │
                                            │ review date agreed           │
                    │                       └──────────────────────────────┘
                    ▼
        ┌─────────────────────────┐
        │ Issue resolved, outcomes │
        │ and conclusions recorded │
        └─────────────────────────┘
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Support Plan

The Support Plan should clearly set out:

- What steps are to be taken to assure the future safety of the learner at risk

- The provision of any additional support

- Modifications or changes in the way services are delivered or provided

- Any on-going risk management strategy as appropriate

The support plan should outline the roles and responsibilities of all individuals involved and who will monitor and review the plan and when this will happen. Support plan should be made with the full participation of the learner at risk.

Reviewing the Support Plan

The Senior Safeguarding Lead in conjunction with the Designated Safeguarding/Prevent Lead should monitor the support plan on an ongoing basis within agreed timescales.

The purpose of the review is to:

- Evaluate the effectiveness of the support plan

- Evaluate whether the plan is meeting/achieve the desired outcome

- Evaluate ongoing risk

- Following the review, it may be agreed that:

- The plan is no longer required, or the plan needs to continue.

- Any changes or revisions to the plan, new timescales should be made if required and outcomes shared with the learner.

Training and Safe Recruitment

Designated Safeguarding Lead and Senior Safeguarding Lead(s) to undertake Designated Safeguarding Lead training (level 3).

Tutors and examiners to have the required Disclosure and Barring Service (DBS) checks undertaken as part of the recruitment process. Contracted tutors will have the required DBS checks as part of the Wilmington External Engagements Process **and will be reviewed every 3 years.**

Monitoring and Measuring

Area	Responsible	When
Number of safeguarding incident reports completed	Designated Safeguarding Lead	Monthly
Number of high-risk issues reported	Designated Safeguarding Lead	Monthly
Status of safeguarding support plans	Multi-team SSP	3 months
Number of prevent duty concerns reported	Designated Prevent Lead	Monthly

Records

Record	Owner	Retention Period	Location
Safeguarding incident reports	ICA Director of Operations	7 years (GDPR applies)	MS Forms
Safeguarding support plans	ICA Director of Operations	7 years (GDPR applies)	Learning Support SharePoint