



Education & Skills  
Funding Agency



**European Union**  
European  
Social Fund



# Safeguarding and Prevent Policy

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## 1. Introduction and Policy Statement

Wildes Education recognises its statutory duties towards safeguarding the welfare of Young People (children) and Adults at Risk from any form of abuse whilst undertaking learning programmes as such the company will ensure that arrangements are in place to create and maintain a safe working and learning environment. An environment where all reasonable measures are taken to ensure that risks of harm are minimised where concerns are identified, and actions are taken to address them where appropriate.

Wildes Education will ensure that all staff and self-employed partners are aware of and understand their statutory responsibilities with respect to safeguarding and are trained in recognising and reporting safeguarding issues.

The company is committed to safeguarding and aims to create a culture of vigilance.

## 2. Scope

Safeguarding is everyone's responsibility. This policy applies to all staff and self-employed partners conducting onsite and offsite activities with learners, regardless of position, role, and responsibilities.

This policy deals with the protection of Young People (children) and Adults at Risk. To clarify, **any person under the age of 18 is deemed a child**, and an **adult at risk** replaces the previously used term 'vulnerable adult' as set out in the governments 'No Secrets' guidance 2010. The Care Act 2014 defines an adult at risk as a person who has care and support needs and/or is at risk of, being abused or neglected and unable to protect themselves against the abuse or neglect or risk of it because of those needs.

Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal, or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Source: No Secrets Guidance

## 3. Objectives

The company aim to ensure that: Appropriate action is taken in a timely manner to safeguard and promote staff and the learner's welfare.

The company will appoint a director as designated safeguarding lead (DSL) to take leadership responsibility on all safeguarding arrangements (including Prevent).

This policy will be reviewed annually by the designated safeguarding lead and/or deputy lead in line with changes or new legislation and/or regulations.

This policy is to be read in conjunction with the Lone Working, Equality & Diversity and Health & Wellbeing policies.

## 4. Safeguarding Adults

The Care Act 2014 defines safeguarding as "protecting an adult's right to live in safety, free from abuse and neglect." The duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support.

## Types of Abuse and Neglect - Adults

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.
- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; and 'honour' based violence (HBV) is a form of domestic abuse which is perpetrated in the name of so called 'honour-based' violence.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits. Doorstep crime is also a common form of financial abuse.
- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.
- **Discriminatory abuse** – including forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, or religion
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.
- **Neglect and acts of omission** – including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating. Neglect also includes not being provided with enough food or with the right kind of food or taken proper care of.
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Source: Care Quality Commission (CQC) <https://www.cqc.org.uk/>

## 5. Safeguarding Children (Under 18)

Safeguarding and promoting the welfare of children is defined for the purposes of Keeping Children Safe in Education guidance as:

- *Protecting children from maltreatment.*
- *Preventing impairment of children's mental and physical health or development.*
- *Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and*
- *Taking action to enable all children to have the best outcomes.*

**A child is someone who has not yet reached their 18th birthday. Once they turn 18, they are legally an adult.**

**Any staff member** who has any concerns about a child's welfare should follow the process set out in appendix 1.

Indicators of Abuse and Neglect - Children

- **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Serious Violence** may signal that a child is at risk from or are involved with serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of exploitation.

**Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, and consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk: Other safeguarding issues staff should be aware of include:**

- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** both CSE and CCE forms of abuse and occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identify, cognitive ability, physical strength, status, and access to economic or other resources.

CSE and CCE may occur in exchange for something the victim needs or wants and/or will be to the financial benefit or advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups. males and females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical and can be facilitated and/or take place online.

**CSE and CCE can affect children, both male and female and can include children who have been moved (commonly known as trafficking) for the purpose of exploitation.**

**Some specific form of CCE** can include children being forced or manipulated into transporting drugs or money through country lines, working in cannabis factories, shoplifting, or pickpocketing. Thy can be forced or manipulated into committing vehicle crime or threatening/committing serious violence on others. It is important to understand that the experience of girls who are criminally exploited can be very different to boys. Girls and boys being criminally exploited are at higher risk of sexual exploitation.

**CCE is a form of sexual abuse.** Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, or touching outside clothing. It may include non-contact

activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to look at sexual images or watch sexual activities, encouraging children to behave in inappropriate way or grooming a child in preparation for abuse including via the internet.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-old who legally consent to have sex. Some children may not realise they are being exploited e.g. They believe they are in a genuine romantic relationship.

- **Mental Health** can be an indicator of that a child has suffered or is at risk of suffering from abuse, neglect, or exploitation. Mental health concerns must be reported to the Safeguarding team immediately. Source: Keeping Children Safe in Education (KCSIE) more information can be found in <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- The company recognise that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges and as such additional barriers can exist when recognising abuse and neglect within this group.

## **6. So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)**

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured, or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

#### **There are four main types of FGM:**

- Type 1 (clitoridectomy) – removing part or all of the clitoris.
- Type 2 (excision) – removing part or all of the clitoris and the inner labia (lips that surround the vagina), with or without removal of the labia majora (larger outer lips).
- Type 3 (infibulation) – narrowing of the vaginal opening by creating a seal, formed by cutting and repositioning the labia.
- Other harmful procedures to the female genitals, including pricking, piercing, cutting, scraping, or burning the area.

#### **Signs, Symptoms and Effects of FGM**

A girl or woman who has had FGM may.

- Have difficulty walking, sitting, or standing.
- Spend longer than normal on the bathroom or toilet.
- Have unusual behaviour after an absence.
- Be particularly reluctant to undergo normal medical examinations.
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

#### **What to look out for before FGM happens**

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about:

- Being taken 'home' for a visit.
- A special occasion to 'become a woman.'
- An older female relative visiting the UK.

If the delivery/enrolment team in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the police.

The practice is illegal in the UK and is classed as child abuse. It is also illegal to arrange for a young person to be taken abroad for FGM to find out more about Female Genital Mutilation: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>

FGM helpline – the NSPCC have a 24-hour dedicated FGM helpline offering information, advice, and guidance **Tel:** 0800 028 3550 or **email** fgmhelp@nspcc.org.uk

Source: Female genital mutilation (FGM) - NHS.UK

## Forced Marriage

Forced marriage is a marriage performed without the full and free consent of one or both parties. Emotional, financial, physical, and sexual threats and abuse, as well as notions of ‘honour’, can all be used to force someone to marry. Forced marriage can lead to physical violence, rape and even murder. <https://www.gov.uk/guidance/forced-marriage>

The pressure put on people to marry against their will may be:

- **Physical** – for example, threats, physical violence, or sexual violence.
- **Emotional and psychological** – for example, making someone feel like they are bringing ‘shame’ on their family.

## Forced Marriage Unit

Contact the Forced Marriage Unit (FMU) if you are trying to stop a forced marriage or need help leaving a marriage you have been forced into.

If you are trying to stop a forced marriage or need help leaving a marriage you have been forced into **Call 999 in an emergency Tel:** 020 7008 0151, **Out of Hours Tel:** 020 7008 1500 (Global response centre) or, **email:** fmu@fco.gov.uk

Source: Forced marriage – GOV UK <https://www.gov.uk/stop-forced-marriage>

## 7. Domestic Abuse

Wildes Education is committed to developing a safe workplace and learning environment by implementing a culture in which there is zero tolerance for abuse, and which recognises that the responsibility for domestic abuse lies with the perpetrator.

The Domestic Abuse Act 2021 introduces the statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right. The definition is based on previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abuse behaviours including but is not limited to psychological; physical; sexual; financial; and emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected”.

By increasing awareness and implementing a strong supportive culture, we will create a safer workplace and learning environment for both staff and learners.

Under the Health and Safety at Work Act (1974) and the Management of Health and Safety at Work Regulations (1992), we recognise our legal responsibilities in promoting the welfare and safety of all staff.



Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day **Tel** 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones.

<https://www.nationaldahelpline.org.uk/>

NSPCC- UK domestic-abuse Signs Symptoms Effects <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

Refuge what is domestic violence/effects of domestic violence on children

<http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/>

Safe lives: young people and domestic abuse. <http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

## **Disclosure and Support**

Wildes Education recognise that developing a life free from abuse is a process not an event and we will provide ongoing support for employees who disclose abuse. The level of support required will be discussed and reasonable adjustments will be made accordingly. Other existing external provisions (including occupational health and independent counselling services) will also be signposted to staff as a means of support.

All disclosures / concerns of domestic abuse made by an employee to another employee and / or their line manager are to be referred to a Safeguarding Officer Team. Actions will be taken to increase their personal safety at work and at home as well as address any risks there may be to colleagues.

All disclosures / concerns of domestic abuse made by a learner to a member of staff, or another learner are to be referred to a member of the Safeguarding team so actions can be taken to increase their personal safety.

Contact information of the Safeguarding team are detailed in this policy.

## **Perpetrators of Domestic Abuse**

Domestic abuse perpetrated by employees will not be condoned under any circumstances. Staff members are always expected to present high standards of personal integrity and conduct that will not reflect adversely on the organisation and its reputation. If an employee approaches a colleague or line manager about their own abusive behaviour, Safeguarding is to be subsequently informed. Information about services and support available will be made accessible.

We will treat any allegation, disclosure, or conviction of a domestic abuse related offence on a case-by-case basis with the aim of reducing risk and supporting change.

There may be signs that an employee is perpetrating domestic abuse. These may include:

- Uncharacteristic late/absent behaviour with no explanation.
- Repeated injuries/scratches/bite marks/bruised knuckles/injuries to wrists and forearms.
- Uncharacteristic moods and depression.
- An obsession with time and an avoidance of socialising.
- Constant text messaging or telephoning a partner
- Jealousy or possessiveness.
- Increase in substance use/dependence.

## 8. Specific Safeguarding issues

Safeguarding issues can manifest themselves via peer-on-peer abuse. Staff should be aware that learners can abuse their peers and children can abuse other children.

**Peer to peer abuse** is unacceptable and will be reported and investigated accordingly in line with this policy. Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up” or “boys will be boys”. Peer to peer abuse is most likely to include, but not limited to:

- **Bullying** (including cyberbullying, prejudice-based and discriminatory bullying).
- **Abuse** in intimate personal relationships between peers.
- **Physical abuse** such as hitting, kicking, biting, shaking, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- **Sexual Violence**, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- **Sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of broader pattern of abuse.
- **Causing someone** to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, to engage in sexual activity with a third party.
- **Consensual and non-consensual sharing** of nude and semi-nude images and/or videos (also known as sexting or your produces sexual imagery).
- **Upskirting**, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- **Initiation/hazing** type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include online element).

The company is committed to responding to all concerns about staff and learners in relation to any form of abuse or welfare concerns. This includes any form of peer-to-peer abuse, harassment, or bullying, including cyber bullying.

**Serious Violence** maybe a signal of risk from or involved in serious violent crime. This may include increased absence, a change of friends, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possession could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

## 9. Contextual Safeguarding

Safeguarding concerns, incidents and/or behaviours can be associated with factors outside of the company. Staff must consider the wider context in which incidents and behaviour occurs. This is known as contextual safeguarding, which means that assessments of learners must consider wider environmental factors that are present in the learners’ life that are a threat to their safety and welfare.

## 10. Online Safety

The use of technology has become a significant component of many safeguarding issues. Child exploitation; radicalisation; sexual predation; technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images online bullying; an
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and or financial scams. If learners or staff are at risk report via Safeguarding team to Anti-Phishing Group <https://apwg.org/>

If you are worried about online sexual abuse or the way someone has been communicating to you online. Make a report to CEOP's Child Protection Advisors <https://www.ceop.police.uk/safety-centre> CEOP helps any child or young people under the age of 18 who is being pressured, forced, or tricked into part in sexual activity of any kind. This can be something that has taken place either online or in 'the real world', or both. The CEOP Safety Centre has clear information and advice on what can be reported to CEOP, the reporting process and what will happen if you do decide to make a report.

## 11. Prevent

Wildes Education understand their Prevent responsibilities of ensuring the welfare of learners, staff, and visitors.

Under section 26(1) of the Counter-Terrorism and Security Act 2015 ("the Act") **imposes a duty on** "specified authorities", when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. **There is an important role for further education institutions, including** sixth form colleges and **independent training providers**, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

Source [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales.pdf)

The duty is commonly referred to as [Prevent statutory duty or the Prevent duty \(the duty\)](#), these are the terms known to most practitioners across the sector.

## 11a Radicalisation

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

Protecting learners from radicalisation is part of the wider safeguarding duties of the delivery team.

**The process of radicalisation may involve:**

- *being groomed online or in person*
- *exploitation, including sexual exploitation*
- *psychological manipulation*
- *exposure to violent material and other inappropriate information*
- *the risk of physical harm or death through extremist acts.*

Source [Radicalisation and child protection | NSPCC Learning](#)

## 11b Vulnerability factors

Anyone can be radicalised but there are some factors which may make a young person more vulnerable. These include:

- *being easily influenced or impressionable*
- *having low self-esteem or being isolated*
- *feeling that rejection, discrimination or injustice is taking place in society*
- *experiencing community tension amongst different groups*
- *being disrespectful or angry towards family and peers*
- *having a strong need for acceptance or belonging*
- *experiencing grief such as loss of a loved one.*

Source [Radicalisation and child protection | NSPCC Learning](#)

## 11c Indicators of Radicalisation

If an individual is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group, or cause. For example, they may:

- *spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)*
- *change their style of dress or personal appearance*
- *lose interest in friends and activities that are not associated with the extremist ideology, group or cause*
- *have material or symbols associated with an extreme cause*
- *try to recruit others to join the cause*

Source [Radicalisation and child protection | NSPCC Learning](#)

## 11d Signs of Radicalisation

There is no single route to radicalisation. However, there are some behavioural traits that could indicate that your child has been exposed to radicalising influences.

**The following behaviours listed here are intended as a guide to help you identify possible radicalisation:**

## Outward appearance

- *Becoming increasingly argumentative*
- *Refusing to listen to different points of view*
- *Unwilling to engage with children who are different*
- *Becoming abusive to children who are different*
- *Embracing conspiracy theories*
- *Feeling persecuted*
- *Changing friends and appearance*
- *Distancing themselves from old friends*
- *No longer doing things they used to enjoy*
- *Converting to a new religion*
- *Being secretive and reluctant to discuss their whereabouts*
- *Sympathetic to extremist ideologies and groups*

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- *Converting to a new religion*
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- *Sympathetic to extremist ideologies and groups*

Source [Signs of Radicalisation - Warning Signs and Indicators in Children \(educateagainsthate.com\)](https://educateagainsthate.com)

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

## 11e Prevent and Reporting

The company recognises that any learner in danger of radicalisation or demonstrating extremist tendencies (violent or non-violent) is deemed to be vulnerable and appropriate support under the PREVENT strategy or through CHANNEL will be sought.

- **Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by identifying individuals at risk, assessing the nature and extent of that risk.

**For immediate terrorist threats: Call 999 or the police anti-terrorist hotline 0800 789 321**

Prevent is an integral part of the Safeguarding **and should be reported in accordance with this procedure. (Appendix A & Appendix C)**

The Safeguarding Lead and Deputy Lead have access to support from the HE/FE Prevent Co-ordinators Network (Appendix D)

## 11f CONTEST

The Governments Counter Terrorism Strategy **CONTEST**' overarching aim is to reduce the risk to the UK and its Citizens and interests overseas from terrorism, so that people can go about their lives freely and with confidence. As stated in the [revised 2018 Contest Strategy](#), Prevent aims to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism

The governments **approach** to the CONTEST strategic framework is made up of the four 'P' approach.

- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Pursue:** to stop terrorist attacks.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare:** to mitigate the impact of a terrorist attack.

**Of the four Ps' approach Prevent is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism.**

The objectives of Prevent are to:

- **Tackle the causes of radicalisation** and respond to the ideological challenge of terrorism.
- **Safeguard and support** those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to **disengage and rehabilitate**.

The **Prevent statutory duty encourages** free speech and open debate as one of our most powerful tools in promoting critical thinking and preventing terrorist and extremist narratives taking hold.

Source: Keeping Children Safe in Education, Counter-terrorism strategy (CONTEST), Channel guidance – GOV.UK and Prevent Duty Guidance

## 11g Prevent Definitions (glossary of terms)

- **Safeguarding** in terms of Prevent is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorist related activity.
- **Vulnerability** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.
- **Ideology** is a set of beliefs.
- **Extremism** - the government defines extremism in the Prevent strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. the strategy also include in the definition of extremism calls for the death of members of our armed forces", whether in this country or overseas".
- **Non-violent extremism'** is extremism, as defined above, which is not accompanied by violence.
- **'Prevention'** in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
- **Prevent** is an integral part of the government's counter-terrorism strategy, CONTEST. Prevent tackles non-violent extremism where it creates an environment conducive to terrorism and popularises ideas that are espoused by terrorist groups.

- **The current UK definition of ‘terrorism’** is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes 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 a political, religious, or ideological cause.
- **‘Terrorist-related offences’** are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.

## 12. Approach

The company take all reasonable measures to ensure that risks of harm to Young People and Adults at Risk’s welfare is minimised by appropriate:

- Staff selection, recruitment, induction, and training.
- Risk Assessment and action planning.
- Health and Safety Procedures.
- Effectively respond to referrals

## 13. Implementation

Wildes Education is committed to providing a comprehensive learner induction to identify their needs including welfare and safeguarding issues such as keeping themselves safe from radicalisation and extremism from the start of their learning journey.

As part of the learner induction each learner has access to a learner handbook which contains information about Prevent, British Values and Safeguarding contacts and is required to complete the Education and Training Foundation (ETF) Side by Side Prevent duty online modules, which consist of:

1. Radicalisation and extremism.
2. Staying safe online.
3. What you can trust.
4. British Values.

At least one person on any interview panel will have undertaken safer recruitment training.

Wildes Education regularly review and where necessary update their Prevent Risk Assessment.

The company ensure that all new staff are subject to a Disclosure and Barring Service (DBS) check. The level of DBS check will depend on the role that is being offered and duties involved. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff. Wildes Education do not retain copies of DBS certificates however, will retain copies of documents used to verify the successful candidate’s identity, right to work and required qualifications following guidance to verify identity [How to prove and verify someone's identity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-prove-and-verify-someone-s-identity)

The Safeguarding team undertake Safeguarding and Safer Recruitment in FE training and Prevent for Leaders and Managers online training annually. The Safeguarding Lead and Deputy complete Designed Safeguarding Lead training at least every two years and attend FE/FE Regional Prevent Meetings.

‘Hot Topics’ are distributed via internal communications to raise awareness and promote discussion around the wider safeguarding agenda including areas, but not limited to: British

Values, Radicalisation, Mental health issues, positive relationships, Staying Safe Online (online safety), Health and Safety, Equality and Diversity and Health and Wellbeing.

Safeguarding, Equality and Diversity, Data Security and Health and Safety remain a fixed agenda item at meetings.

Wildes Education embed British values into learning sessions through 'real life' events and topics to ensure learners can identify where these are relevant to their work and everyday lives.

The curriculum enables learners to build on knowledge of: Safeguarding including Prevent, Online Safety, Equality and Diversity, British Values during induction and Equality and Diversity during learning sessions.

#### **Staff are required to:**

- Refer all safeguarding (including prevent) concerns and/or incidents to safeguarding.
- Wear the DBS badge/ lanyard provided by the company when visiting learners.
- Complete Safeguarding, Prevent, and Equality and Diversity training during their induction then undertake Safeguarding and Prevent refresher training annually, and other training as required.
- During induction then annually (usually each September in line with KCSIE updates) read this updated Safeguarding Policy together with part 1 of Keeping Children Safe in Education. Managers and staff who work directly with young people are also required to read Annex A of the statutory guidance.
- Adhere IT and online safety policies.
- Promote British values by naturally embedding into learning sessions through 'real life' events and topics to ensure learners can identify where these are relevant to their work and everyday lives.
- Ensure that all learners have access to the learner handbook and complete the handbook questions.
- Ensure that all learners complete Side by Side Prevent duty online modules as specified on page 12.

## **14. Safeguarding and Welfare Responsibilities**

**Directors** fulfil statutory responsibilities, directors will ensure that arrangements are in place to create and maintain a safe learning environment and ensure that policies, procedures, and practices comply with the law.

**The Designated Safeguarding Lead (DSL)** and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The activities of the designated safeguarding lead may be delegated to the appropriately trained deputy lead however, the ultimate lead responsibility for safeguarding and child protection, remains with the designated safeguarding lead.

The designated safeguarding lead will, as required, refer cases:

- Of suspected abuse to the appropriate agencies as required.
- Support staff how make referrals to local authority children's social care.
- To the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.



- Where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service (DBS) and.
- Where a crime may have been committed to the police as required.
- Act as a source of support, advice, and expertise for all staff

**The Deputy Designated Safeguarding Lead and Safeguarding Officer** are responsible for the day-to-day operational management of safeguarding issues. The safeguarding team will deal with employee concerns over learner's welfare, signpost, offer guidance and liaise with the safeguarding lead for concerns requiring referral to external agencies. When the designated safeguarding lead is absent, the deputy lead will act as cover.

**Staff** are required to raise safeguarding concerns in line with this policy.

**The following actions are strictly prohibited by staff and self-employed partners.**

- Engage in personal relationships with learners beyond that appropriate for a learner /tutor relationship
- Abuse their position of trust under section 16 of The Sexual Offences Act 2003  
<http://www.legislation.gov.uk/ukpga/2003/42/section/16>
- Distribute personal telephone numbers.
- Visit learners at home.
- Transport learners to and from locations (this includes travelling in the car with a learner driving).
- Use sarcasm, insults, or belittling comments towards learners.
- Making sexual suggestive comments

\*Staff must always act professionally and any employee who breach the above may be subject to the disciplinary procedure.

## **15. Reporting Safeguarding Concerns** (Including Prevent and online safety)

If a member of staff is unsure if their concern is safeguarding, they are required to seek advice from a member of the safeguarding team.

For help and advice between Monday-Friday 8am – 5pm contact a member of the Safeguarding team

### **Safeguarding Team at Wildes Education**

- **Julie Lawton** Tel 07810 091 084 / 0114 228 8588 ext. 2252
- **Sally Buxton** Tel 07385 089 041

Email [safeguarding@wildeseducation.co.uk](mailto:safeguarding@wildeseducation.co.uk)

Concerns about a child's welfare must be reported immediately to the designated safeguarding lead or deputy lead (refer Appendix b for further information about referrals).

### **Reporting Process:**

Complete a Safeguarding and Prevent Disclosure Form (Appendix A) or located on the companies Intranet. Submissions must contain as much detail as possible:

- Contain factual evidence
- Use the persons own words and phrases.
- Describe the circumstance in which the disclosure came about.
- Include information about the setting and anyone else who was there at the time.
- Submit the disclosure form within 24 hours of disclosure.

- Submit to [safeguarding@wildeseducation.co.uk](mailto:safeguarding@wildeseducation.co.uk)
- A member of the safeguarding team will log the concern/disclosure information within a secure folder located on the server. \*Due to the sensitivity of this information this log, and reporting forms are only accessible by the Safeguarding team.
- The safeguarding team must be informed when a learner, where there has been a safeguarding concern, is withdrawn from the programme and why.

If you are in doubt about recording requirements, staff are required to speak to a member of the safeguarding team.

If the concern is identified as not being safeguarding, seek guidance in line with the Information, Advice and Guidance Policy. If you suspect a member of staff or self-employed partner is abusing a learner or breaching their position in a safeguarding capacity, it is your responsibility to whistle blow and report the allegation in line with this procedure.

All concerns, discussion and decisions made will be clearly recorded in writing and information will be kept confidential and stored securely.

## 16. Escalation

If a disclosure is made but is not resolved to your satisfaction, then you have the right to escalation. The issue should be raised to the designated safeguarding lead unless your concern is about them when you should raise this with a member of the Board.

## 17. Inspecting Safeguarding (including Prevent)

Ofsted's inspections of early years, schools and post-16 provision will be carried out under: <https://www.gov.uk/government/publications/education-inspection-framework>

Inspectors will always report on whether arrangements for safeguarding children and learners are effective. In addition to the Framework and Inspections Handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: [Inspecting safeguarding in early years, education and skills settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills-settings)

## 18. Confidentiality and Information Sharing

Staff must maintain confidentiality by not discussing their concern with anyone other than the Safeguarding Team.

Staff must be aware that they cannot promise to keep secrets which might compromise a learner's safety or wellbeing.

- Safeguarding Young People (children) statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm. Such concerns will be referred into Children Social Care and the Police if appropriate.
- In relation to learners 18 years and over, and classed as an adult in law, the company has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act (including DoLs) 2005 and the Human Rights Act 1998.

The Safeguarding Team have a professional responsibility to share relevant information with other agencies to safeguard within the boundaries of **the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children**

## 19. Monitoring

Compliance with this procedure will be monitored by the Safeguarding Team.

An annual report will be produced for the director to include:

- Number of disclosures for the current academic year (not detailed or identifying to individuals).
- Allegations against staff.
- Any changes required to current practice.
- Company training requirements.
- Outcomes of the policy review.

Any questions or concerns about the operation of this policy, or if you consider that this policy has not been followed, you should raise the matter with the designated safeguarding lead or deputy lead.

## 20. Useful Resources and Supporting information

- Keeping children safe in education <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Sexual violence and sexual harassment between children in schools and colleges <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- In Chapter one of Working Together to Safeguard Children <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> which includes a myth-busting guide to information sharing
- Information sharing: advice for practitioners providing safeguarding services <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- at The Information Commissioner's Office (ICO) General Data Protection guidance [Guide to Data Protection | ICO](#)
- in Data protection: toolkit for schools <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> - Guidance to support schools with data protection activity, including compliance with the UK GDPR.
- Education Act 2002 – Legislation <http://www.legislation.gov.uk/ukpga/2002/32/contents>
- Working together to safeguard children <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- The Prevent duty in further education and Skills providers <https://www.gov.uk/government/publications/the-prevent-duty-in-further-education-and-skills-providers>
- The Prevent duty guidance – GOV UK <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Counter-terrorism strategy (CONTEST) – GOV UK <https://www.gov.uk/government/collections/contest>
- Departmental advice <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- Filters and monitors <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>

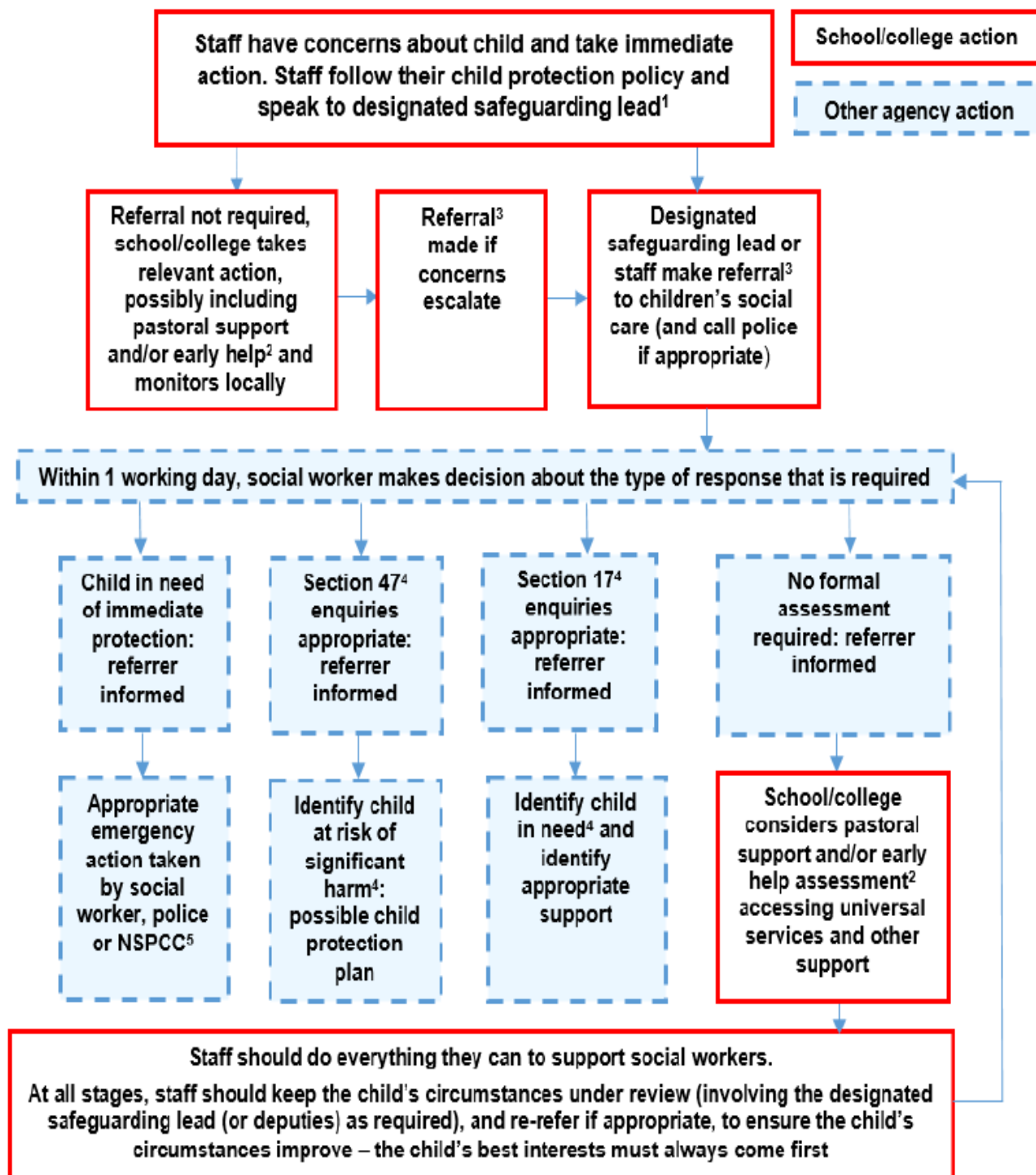
## 21. External Agencies: Information, Advice and Guidance

Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

- General guidance on whistleblowing can be found via <https://www.gov.uk/whistleblowing> and the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- **Safeguarding Children** - Sheffield Safeguarding Hub Office hours are from 8.45am to 5.15pm (Monday to Thursday) and 8.45am to 4.45pm (Friday) at all other times including Bank Holidays, calls will be responded to by the Emergency Duty Service. Tel: 01142734450 email: [sscb@sheffield.gov.uk](mailto:sscb@sheffield.gov.uk)  
<https://www.safeguardingsheffieldchildren.org/sscb>
- **Personal safety**: contact the Police 999 or 101
- **Health and Wellbeing** contact your out of hours Doctors or call the Hospital on 111
- **Abuse of an older person**: call 999 to report a crime that is in progress or if someone is in immediate danger
- **Reporting abuse**: contact the local police <https://www.police.uk/> if you think a crime has been committed or contact the local council <https://www.gov.uk/find-local-council> if you think someone is at risk of being abused.
- Concerns about the quality of care contact the Care Quality Commission (CQC) customer Service on 03000 616161 <https://www.cqc.org.uk/contact-us>
- **Care homes and home carers**: contact the local council if you are concerned about someone not being treated properly in a care home or someone is being mistreated by a carer.
- **Help and advice** – if you want to discuss concerns and get some advice, contact Action on Elder Abuse helpline on 0800 808 8141
- **18 or under** call the NSPCC on 0800 1111. call or email the NSPCC helpline on 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Contact your local Authority Out of Hours Social Care number for any concerns relating to a **child (under 18)**, which you can find by putting in the postcode here <https://www.gov.uk/report-child-abuse-to-local-council>
- **Helping children safe** [Keeping children safe | NSPCC](#)
- **Freephone National Domestic Abuse Helpline, run by Refuge**  
Tel 0808 200 0247  
[www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- **Men's Advice Line**  
Tel 0808 801 0327  
[www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- **Galop** (for lesbian, gay, bisexual, and transgender people)  
Tel 0800 999 5428 [www.galop.org.uk](http://www.galop.org.uk)
- **Rape Crisis** (England and Wales)  
Tel 0808 802 9999 [www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)

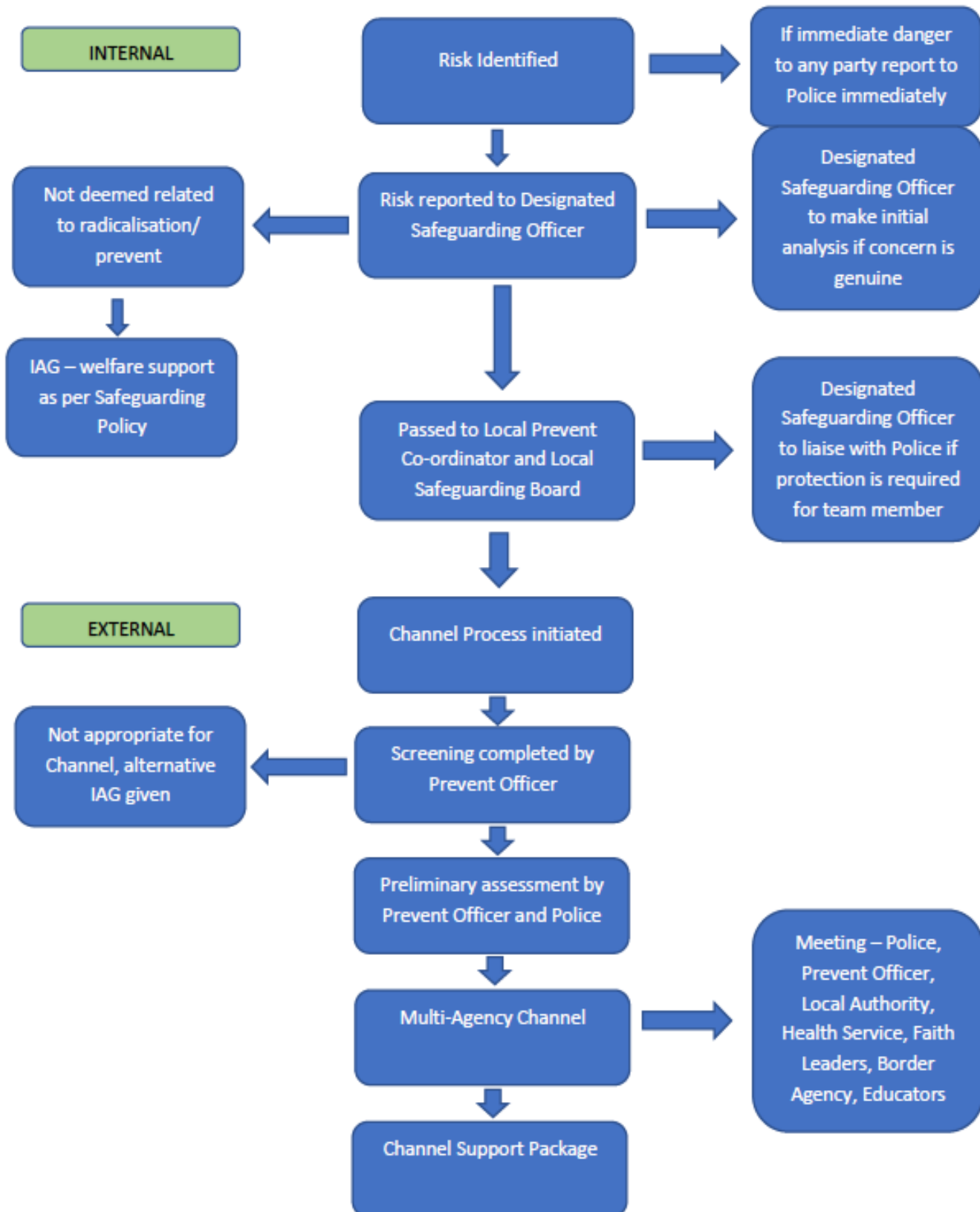
<b>Safeguarding and Prevent Concern Record</b>			
<b>Name of the person completing this form</b> *i.e. Assessor / Coach			
<b>Job Title of the person completing this form</b>			
<b>Name of person who this concern is about</b> *i.e. Learner			
<b>Contact details of person who this concern has been raised about</b>			
<b>Date the concern was raised/ identified:</b>		<b>Time raised/ identified</b>	
<b>Employer:</b>			
<b>Address:</b>			
<b>1. Details of the concern</b>			
<p>Reports must contain as much detail as possible:</p> <ul style="list-style-type: none"> <li>○ <i>Contain factual evidence</i></li> <li>○ <i>Use the persons own words and phrases.</i></li> <li>○ <i>Report all feelings and suspicions, but clearly separated from the factual evidence.</i></li> <li>○ <i>Describe the circumstance in which the disclosure came about.</i></li> <li>○ <i>Include information about the setting and anyone else who was there at the time.</i></li> </ul> <p><i>(Make a clear distinction between what is fact, opinion, or hearsay)</i></p>			
<p><b>Safeguarding email:</b> <a href="mailto:safeguarding@wildeseducation.co.uk">safeguarding@wildeseducation.co.uk</a>  <b>Julie Lawton</b> 07810 091 084      <b>Sally Buxton</b> 07385 089 041  <b>Office</b> 0114 22 88 588</p>			

## Actions where there are concerns about a child

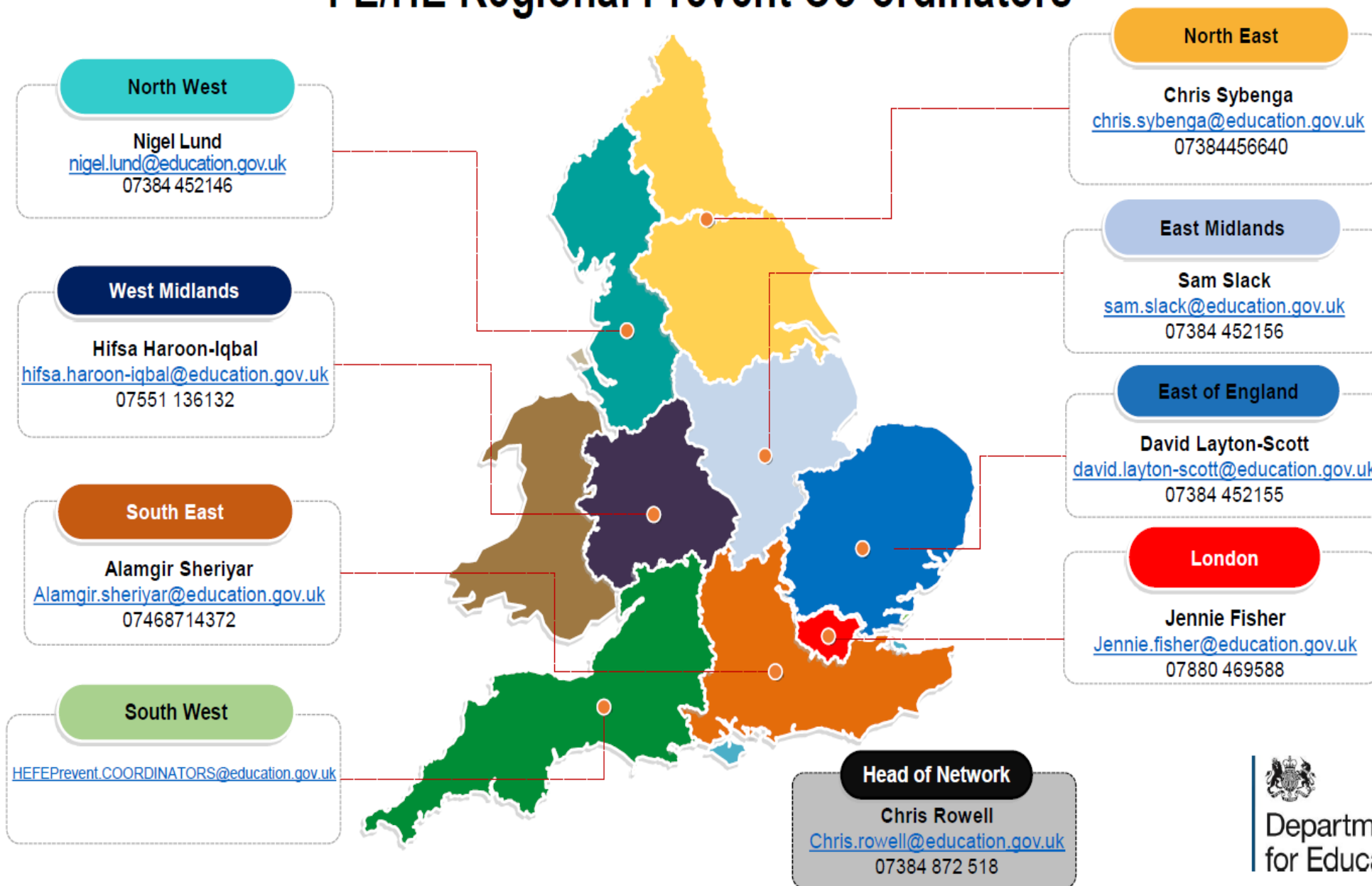


**PREVENT POLICY**

**APPENDIX C – REFERRAL AND CHANNEL PROCESS**



# FE/HE Regional Prevent Co-ordinators





## Document Control

Date of Change	Version	Overview of amendment	Amended by / Job Title	Approval by and Date
23/09/2019	3	Annual review and update	Sussanah Mather	Director of Apprenticeships
06/10/2020	4	Annual review and update in line with KCSIE changes	Julie Lawton Quality & Compliance Mgr.	S Lawrence 09/10/2020 Director of Education
15/2/2021	5	Policy updated in line KCSIE following the UK leaving the EU. <b>Section 12</b> check past conduct of individuals who have lived or worked overseas following withdrawal from EU.	Julie Lawton Quality & Compliance Mgr.	S Lawrence 18/02/2021 Director of Education
05/10/2021	6	Updated in line with KCSIE 2021 statutory guidance.	Julie Lawton Quality & Compliance Mgr.	S Lawrence 20/10/2021 Director of Education
16/02/2021	7	Integrated Prevent into the Safeguarding Policy.	Julie Lawton Quality & Compliance Mgr.	S Lawrence 16/02/22 Managing Director
08/03/2022	8	Change of contact numbers within section 15 page 17.	Julie Lawton Quality & Compliance Mgr.	S Lawrence 08/03/22 Managing Director
01/06/2022	9	Change of contact numbers within pages 17 & 21.	Julie Lawton Quality & Compliance Mgr.	