William College

Safeguarding and Prevent Policy and Procedures

© William College. All rights reserved

Document Version Control	
Document Title	Safeguarding and Prevent Policy and Procedures
Version	1
Reviewing Committee	Equality, Diversity and Inclusion Committee (EDI)
Approving Committee	Board of Governors
Policy Lead	Designated Safeguarding Lead
Date of Last Review	February 2026
Date of Approval	April 2026
Date Effective from	May 2026
Date of Next Review	May 2027

© William College. All rights reserved

Table of Contents

1. Introduction 3
2. Purpose 3
3. Scope 3
4. Policy Statement 4
5. Definitions 4
6. Responsibilities 5
7. Safer Recruitment 5
8. Safeguarding Procedures 5
   - 8.1 Reporting Safeguarding Concerns 6
   - 8.2 Assessment and Escalation 6
   - 8.3 Allegations Against Students or Staff 6
   - 8.4 Allegations Against Senior Leaders 6
   - 8.5 Consent, Capacity and Information Sharing 6
9. Prevent Procedures 7
   - 9.1 Reporting Prevent Concerns 7
   - 9.2 Prevent Referral Pathway 7
   - 9.3 Prevent Risk Assessment and External Speakers 7
10. Compliance, Monitoring and Assurance 8
    - 10.1 Monitoring and Oversight 8
    - 10.2 Reporting and Assurance 8
11. Whistleblowing and Anonymous Concerns 8
12. Training and Communication 8
    - 12.1 Staff Training 8
    - 12.2 Student Awareness 8
    - 12.3 Support for Students with Disabilities and Additional Needs 8
13. Policy Review 8
14. Related Policies 9
15. Appendix A: Safeguarding Concern Report Form 10
16. Appendix B: Prevent Concern Report Form 11
17. Appendix C: Additional Definitions 13
18. Appendix D: Safeguarding Procedure Flowchart 15
19. Appendix E: Prevent Procedure Flowchart 16

© William College. All rights reserved

1. Introduction

William College is committed to providing a safe, inclusive, and supportive environment for all members of its community. As a higher education provider with an adult student population, the College recognises its responsibility to safeguard adults at risk and to protect individuals from harm, abuse, neglect, exploitation, and radicalisation.

Safeguarding at William College encompasses a broad range of risks, including those associated with extremism and radicalisation under the Counter-Terrorism and Security Act 2015 (Prevent Duty). This policy is informed by the Statutory Prevent Duty Guidance for Higher Education Providers, the Care Act 2014, the Data Protection Act 2018, and sector best practice guidance.

The College adopts a whole-institution approach to safeguarding and Prevent, ensuring that responsibilities are embedded across governance, leadership, operational delivery, academic provision, digital systems, and institutional culture.

This policy has been designed to meet the expectations of the Office for Students (OfS), including Conditions of Registration E6–E9, and the Prevent Duty Monitoring Framework.

2. Purpose

The purpose of this policy is to set out William College's approach to safeguarding and the Prevent Duty, defining how the College protects students, staff and others from harm, abuse, neglect, exploitation and radicalisation.

This policy establishes the College's framework for:

- Safeguarding adults at risk in line with the Care Act 2014.
- Identifying, assessing, and responding to safeguarding concerns.
- Meeting statutory responsibilities under the Counter-Terrorism and Security Act 2015 (Prevent Duty).
- Preventing individuals from being drawn into terrorism or extremist ideology through early identification, support, and proportionate intervention.
- Ensuring that safeguarding and Prevent arrangements are integrated, effective, and compliant with Office for Students Conditions of Registration E6–E9.

While safeguarding and Prevent responsibilities may be shared with partner universities or external agencies, William College retains primary responsibility for the initial identification, management, and escalation of any safeguarding or Prevent concern arising from its provision.

3. Scope

This policy applies to all members of the William College community, including employees, students, governors, contractors, agency workers, volunteers, and visitors. It covers safeguarding and Prevent responsibilities across all College activity, whether on campus, online, or off-site.
Safeguarding and Prevent duties apply to all College activity including:

- All College premises and teaching spaces.
- Online and digital platforms used for learning, communication, or support.
- Off-site teaching, trips, events, and outreach activity.

© William College. All rights reserved

- Placements, internships, and work-based learning arranged or endorsed by the College.
- Services delivered by third-party providers or contractors.

4. Policy Statement

William College is committed to maintaining a safe environment in which all individuals are treated with dignity and respect. Safeguarding is fundamental to the College's educational mission and is a shared responsibility across the institution.

The College adopts a preventative, proportionate and risk-based approach to safeguarding and Prevent, promoting early identification of concerns and timely intervention while respecting individual rights, equality, academic freedom and freedom of speech.

The College aims to:

- Promote the safety and wellbeing of adults at risk.
- Establish clear procedures for identifying and responding to safeguarding and Prevent concerns.
- Maintain a culture of vigilance, accountability, and transparency.
- Ensure staff and students have access to appropriate information, training, and designated safeguarding personnel.
- Maintain compliance with statutory duties, ofs conditions E6-E9, and partner university requirements.
-

Safeguarding oversight is embedded within the College's governance structures. The Designated Safeguarding Lead reports regularly to the Senior Leadership ManagementTeam and the Board of Governors.

5. Definitions

Term	Definition
Adult at Risk	A person aged 18 or over who has care and support needs and is unable to protect themselves from harm, abuse, or exploitation.
Safeguarding	Actions taken to promote the welfare of individuals and protect them from harm, abuse, neglect, or exploitation.
Abuse	Includes physical, emotional, sexual, financial, discriminatory, organisational abuse, and neglect. Abuse may occur online or offline
Radicalisation	The process by which a person comes to support terrorism or extremist ideologies.
Extremism	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
Prevent Duty	A statutory duty under the Counter-Terrorism and Security Act 2015 requiring higher education providers to have due regard to the need to prevent people from being drawn into terrorism.

Additional definitions can be found in Appendix C.

© William College. All rights reserved

6. Responsibilities

Department/ Individual	Responsibilities
Board of Governors	• Approves the Safeguarding and Prevent Policy. • Receives annual safeguarding and Prevent reports. • Provides oversight of serious incidents. • Seeks assurance of compliance with statutory and OfS requirements.
Senior Leadership Management Team (SLMT)	• Embeds safeguarding and Prevent within strategy and risk management. • Ensures appropriate resourcing and training. • Oversees the Prevent risk assessment and action plan. • Receives safeguarding and Prevent reports.
Designated Safeguarding Lead (DSL)	• Provides strategic and operational leadership for safeguarding. • Receives and assesses safeguarding concerns. • Liaises with statutory agencies and partner universities. • Maintains secure safeguarding records. • Reports regularly to SLT and the Board.
Designated Prevent Lead (DPL)	• Leads Prevent Duty compliance. • Assesses Prevent concerns and manages referrals. • Liaises with regional Prevent partners. • Maintains Prevent risk assessments and action plans.
All Staff	• Remain alert to safeguarding and Prevent risks. • Complete mandatory training. • Report concerns promptly.
All Students and Visitors	• Act responsibly and respectfully. • Report concerns and engage with support mechanisms.

7. Safer Recruitment

William College applies safer recruitment to prevent unsuitable individuals from working with adults at risk. Measures include:

- Identity, right-to-work.
- Employment history checks.
- Disclosure and Barring Service (DBS) checks for certain roles where necessary.
- Mandatory declaration of relevant criminal convictions.
- Safeguarding declarations.
- Safeguarding-focused interview questions, where appropriate.
- Safeguarding clauses in third-party contracts.

8. Safeguarding Procedures

William College ensures that safeguarding concerns are managed promptly, proportionately, and in line with statutory guidance. These procedures apply to any concern relating to the safety or wellbeing of an adult at risk, student, staff member, visitor, or contractor.

© William College. All rights reserved

8.1 Reporting Safeguarding Concerns

Any safeguarding concern must be reported immediately to the DSL.

- In an emergency, individuals must contact 999 before notifying the DSL at safeguarding@williamcollege.com.
- Staff must not investigate concerns.
- Factual information must be recorded using the Safeguarding Concern Report Form (Appendix A).

All reports are logged in the College's safeguarding system and stored securely in line with UK GDPR. The DSL will acknowledge receipt within 24 hours and complete an initial risk assessment within two working days. Additional information may be requested to support the assessment.
Anonymous concerns will be considered based on the information available, although follow-up may be limited.

8.2 Assessment and Escalation

The DSL will determine appropriate action, which may include:

- Internal wellbeing support.
- Referral to statutory agencies.
- Joint work with partner universities, where appropriate.

A Safeguarding Panel may be convened for complex or high-risk cases. The Panel many include representatives including the DSL, safeguarding officers, Student Experience Manager, HR (for staff cases)

8.3 Allegations Against Students or Staff

Protective measures may be applied without presumption of guilt, pending investigation.
For staff cases:

- The DSL will consult with HR.
- Where appropriate, the DSL will refer the matter to the Local Authority Designated Officer (LADO).

For student cases:

- The DSL will coordinate with the Wellbeing Team
- Disciplinary processes may be initiated under the Student Disciplinary Policy.

8.4 Allegations Against Senior Leaders

If a concern is raised about the DSL:

- It must be reported directly to the Academic Dean.
- Allegations against senior leaders must be reported to the Chair of the Board of Governors.
- External safeguarding advice may be sought where appropriate.

The individual subject to the allegation will not be involved in decision-making.

8.5 Consent, Capacity and Information Sharing

Safeguarding information is shared strictly on a need-to-know basis in line with UK GDPR, the Data Protection Act 2018, and statutory safeguarding guidance.

- Staff must not promise confidentiality; they should explain that information may need to be shared to keep individuals safe.
- Safeguarding records are stored securely and separately from academic or HR records.
- Information may be shared with partner universities or statutory agencies where necessary to protect an individual from harm.

© William College. All rights reserved

Where appropriate, consent will be sought before sharing information. Where an individual lacks capacity or there is a significant risk of harm, information may be shared without consent in line with the Care Act 2014.

Information is shared on a need-to-know basis and stored securely.

9. Prevent Procedures

William College fulfils its responsibilities under the Counter-Terrorism and Security Act 2015 by identifying, assessing, and responding to risks of radicalisation and extremism. Prevent is delivered as part of the College's wider safeguarding responsibilities and is implemented proportionately, with full regard for individual rights, equality, academic freedom, and freedom of speech.

9.1 Reporting Prevent Concerns

Prevent concerns must be reported immediately to the i Designated Prevent Lead (DPL).

- In emergencies, contact 999 before notifying the DPL.
- Staff must not investigate.
- Concerns may be reported using the Prevent Concern Report Form (Appendix B) or initially via email, with the form submitted as soon as practicable.

Where a Prevent concern involves a student, appropriate pastoral and wellbeing support will be offered throughout the process, including during any assessment, consultation, or referral stage.

If the DPL is unavailable, concerns should be directed to the DSL.

The DPL will acknowledge receipt within 24 hours and complete an initial assessment within two working days.

9.2 Prevent Referral Pathway

Following assessment, actions may include:

- Internal wellbeing support.
- Consultation with the regional Prevent team.
- Referral to Channel.

All Prevent referrals are handled sensitively and proportionately, with due regard to privacy, equality, and individual rights.

9.3 Prevent Risk Assessment and External Speakers

The College maintains:

- A Prevent risk assessment.
- A Prevent action plan.
- An External Speakers Code of Conduct.

All events and speakers are subject to proportionate risk assessment and mitigation.

© William College. All rights reserved

10. Compliance, Monitoring and Assurance

10.1 Monitoring and Oversight

The DSL and DPL hold responsibility for overseeing policy implementation and ensuring that safeguarding and Prevent practices across the College are compliant with relevant legislation and aligned with best practice.

10.2 Reporting and Assurance

An annual report to SLT and the Board of Governors includes:

- Safeguarding and Prevent case data and trends.
- Prevent referrals and outcomes.
- Training and compliance.
- Lessons learned and improvement actions.

11. Whistleblowing and Anonymous Concerns

Individuals raising safeguarding or Prevent concerns in good faith are protected under the Whistleblowing Policy. Anonymous concerns will be assessed proportionately.

12. Training and Communication

12.1 Staff Training

All staff must complete mandatory Safeguarding and Prevent training as part of induction, with refresher training at least every year. The DSL undertakes advanced safeguarding and the DPL specialist Prevent training. Training compliance is monitored by HR.

12.2 Student Awareness

Students receive safeguarding and Prevent information during induction and through awareness campaigns. Materials explain how to recognise concerns, access support, and report issues safely. Students will also receive refresher courses on an annual basis.

12.3 Support for Students with Disabilities and Additional Needs

The College provides reasonable adjustments to ensure students with disabilities or additional needs can engage fully with safeguarding and Prevent processes.

13. Policy Review

The Safeguarding and Prevent Policy and Procedure is reviewed on annual basis or sooner based on regulatory changes or partner expectations. Amendments are approved by the Board of Governors.

© William College. All rights reserved

14. Related Policies

- External Speakers Code of Conduct
- Academic Freedom and Freedom of Speech Code of Practice
- Web-Filtering and Monitoring Policy
- Student Disciplinary Policy and Procedure
- Whistleblowing Policy and Procedure
- Student Code of Conduct
- Bath Spa University Safeguarding Policy.
- Birbeck University Prevent Duty Policies
- Birbeck Safeguarding Policy & Procedure

© William College. All rights reserved

15. Appendix A: Safeguarding Concern Report Form

This form should be used to record safeguarding concerns. In an emergency, please do not delay in informing the police or central social services. All the information must be treated as confidential and reported to the Designated Safeguarding Lead via safeguarding@williamcollege.com. The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

Your details – the person completing the form
Name:
Position:
Telephone:
Email:
Details of the person affected and/or at risk
Name:
Email (if known):
Other present or potential witnesses
Name:
Email:
The person affected and/or at risk's account (if applicable). Include what they want the outcome to be.

Additional relevant information (please detail anything else that you believe to be helpful or important).

Declaration
I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

To be completed by the Designated Safeguarding Lead (or nominee).
Actions: Please state the immediate actions you took in response

People contacted or organisations referred (if applicable)

Declaration
I have completed this form to the best of my knowledge.

© William College. All rights reserved

16. Appendix B: Prevent Concern Report Form

1. **Reporter Details**
   Name:
   Role (Student/Staff/Visitor/Contractor):
   Department/Course:
   Contact Email:
   Contact Phone Number:

   If you wish to report anonymously, leave this section blank. Please note that anonymity may limit the College's ability to follow up.
2. **Person of Concern**
   Name:
   Role (Student/Staff/Visitor/Contractor):
   Department/Course:
   Contact Details:

3. **Nature of Concern**
   (Factual information only — do not investigate or interpret.)
   Please provide as much detail as possible. Include:
   - What you observed or heard.
   - When and where it occurred.
   - Any specific statements, behaviours, or online activity.
   - Any materials, content, or communications involved.
   - Whether anyone else witnessed the concern.

4. **Immediate Risk**
   Is there an immediate risk to life or safety?
   Yes ☐
   No ☐
   Details:

   Has 999 been contacted?

   Yes ☐
   No ☐
   Details:

   Has the individual expressed intent to harm themselves or other?

   Yes ☐
   No ☐
   Details:

5. **Additional Context**
   Include any relevant background information, such as:
   - Changes in behaviour, appearance, or social circle.
   - Expressions of extremist ideology.
   - Isolation, vulnerability, or personal circumstances.
   - Online activity or social media concerns.
   - Concerns raised previously.

© William College. All rights reserved

6. Actions Taken So Far

Did you speak to anyone about the concern? (Do not speak to the individual involved)?

Has the DSL or DPL been contacted verbally? ☐

Any immediate safeguarding concerns? ☐

7. Supporting Evidence (If applicable)

Please upload or list any documents, screenshots, emails or other evidence submitted with this form.

© William College. All rights reserved

17. Appendix C: Additional Definitions

The following definitions provide further detail on forms of abuse and harm that may be relevant within a higher education setting. This list is not exhaustive, and multiple forms of abuse may occur simultaneously.

Table 1: Abuse, Neglect, Violence and Exploitation

Type of Abuse / Harm	Definition
Bullying (including cyberbullying)	Repeated behaviour that intentionally harms another person physically or emotionally, including online harassment or prejudice-motivated behaviour.
Domestic Abuse / Domestic Violence	Controlling, coercive, threatening, violent, or abusive behaviour between intimate partners or family members aged 16 or over. May be psychological, physical, sexual, financial, or emotional.
Drug or Substance Misuse	Harmful use of alcohol, illegal drugs, prescription medication, psychoactive substances, or volatile substances. May trigger Fitness to Practise processes where relevant.
Emotional / Psychological Abuse	Persistent behaviour that causes emotional harm, undermines self-worth, or creates fear, distress, or humiliation.
Extremism	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.
Faith-Based Abuse	Abuse carried out using spiritual authority or belief systems to control, manipulate, or exploit another person.
Forced Marriage	A marriage conducted without the free and full consent of one or both parties, often involving coercion, threats, or violence. Illegal in the UK.
Gender-Based Violence / VAWG	Violence directed at a person because of their gender, or violence that disproportionately affects women and girls. Includes domestic abuse, sexual violence, harassment, forced marriage, FGM, and trafficking.
Grooming	Building trust with a person to manipulate, exploit, or abuse them. May be sexual, criminal, financial, or ideological.
Hate Crime	Any criminal offence perceived to be motivated by hostility or prejudice based on race, religion, sexual orientation, disability, or transgender identity.
Honour-Based Abuse	Violence, threats, or coercion committed to protect or defend perceived family or community honour.
Mental Health Abuse	Behaviour that intentionally harms or exploits an individual's mental wellbeing, including manipulation, coercion, or emotional mistreatment.
Neglect	Persistent failure to meet an adult at risk's basic physical, emotional, or care needs, placing them at risk of harm.
Online Abuse	Abuse carried out through digital platforms, including image sharing, grooming, cyberbullying, or coercive online behaviour.
Physical Abuse	Causing physical harm through actions such as hitting, shaking, burning, poisoning, or otherwise injuring a person. Includes forms of domestic or honour-based violence.
Self-Harm	Deliberate injury to oneself as a way of coping with distress. May include cutting, burning, overdosing, risky behaviours, or ingesting harmful substances.

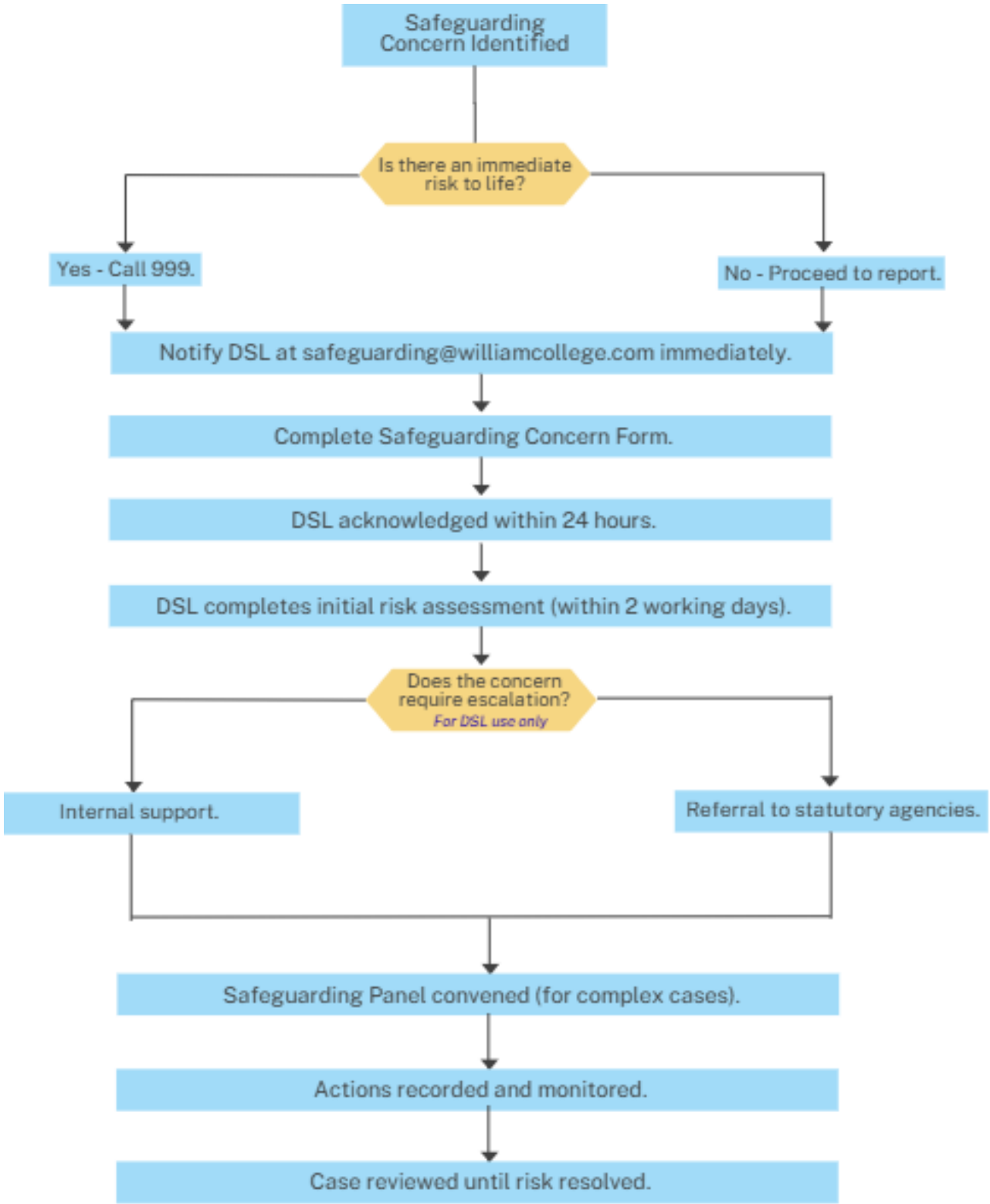
© William College. All rights reserved

Table 2: Sexual Abuse, Sexual Violence, and Trafficking

Type of Abuse / Harm	Definition
Non-Consensual Sexting	Creating, sharing, or forwarding sexual images or messages without the consent of the person depicted or the recipient.
Sexual Abuse	Forcing, coercing, or manipulating a person into sexual activity. Includes contact and non-contact acts, exploitation, grooming, and involvement in sexual imagery.
Sexual Exploitation	Taking advantage of a person for sexual purposes, including coercing sexual behaviour, recording indecent acts, forcing exposure to pornography, or other exploitative conduct.
Sexual Violence	Any non-consensual sexual act or attempt to obtain a sexual act through force, coercion, intimidation, or when a person is unable to consent. Includes rape and attempted rape.
Trafficking	Recruitment, movement, or control of individuals through coercion, deception, or exploitation for purposes such as forced labour, sexual exploitation, servitude, or organ removal.

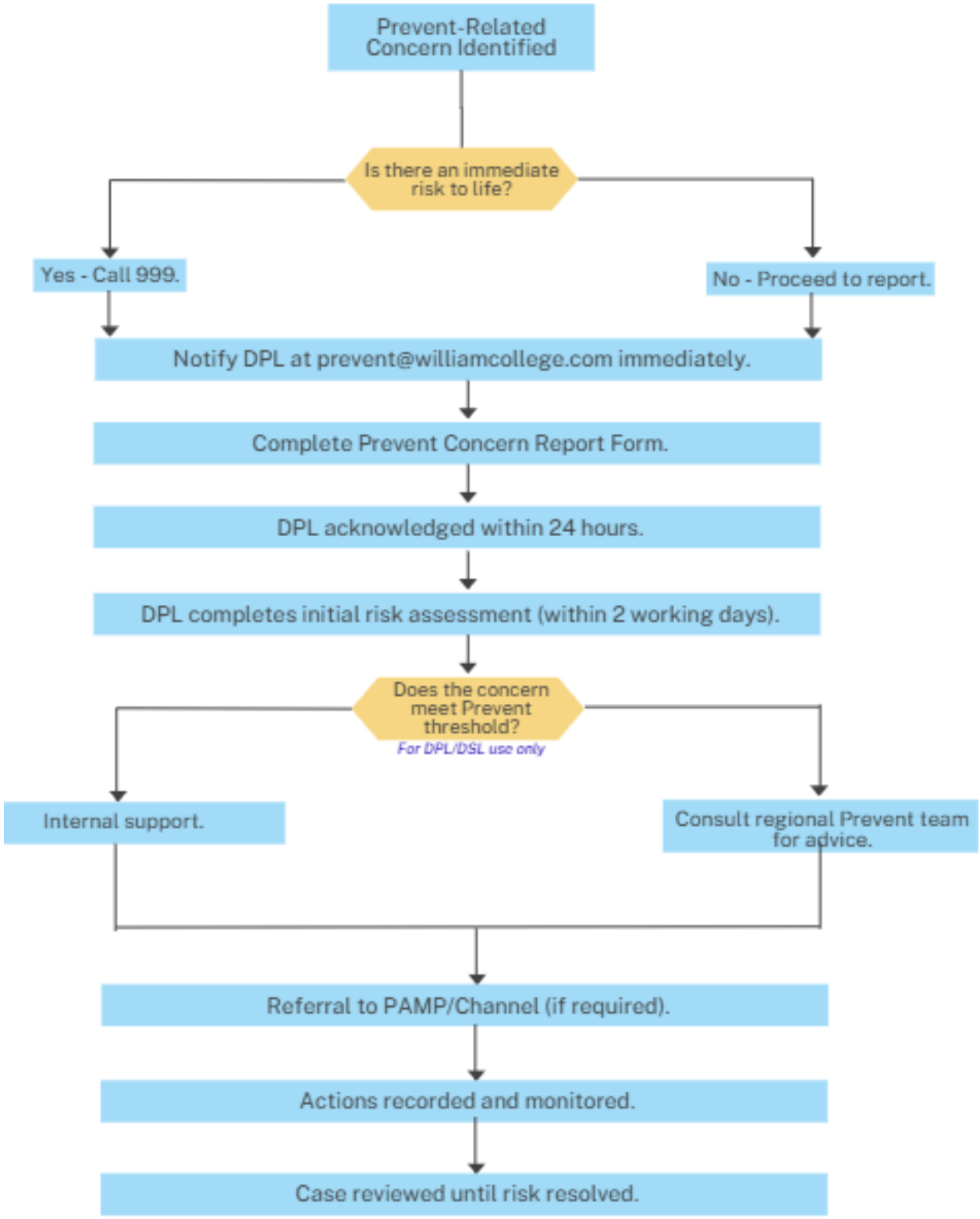
© William College. All rights reserved

18. Appendix D: Safeguarding Procedure Flowchart



© William College. All rights reserved

19. Appendix E: Prevent Procedure Flowchart



© William College. All rights reserved