

<b>Committee:</b> Safeguarding Sub Committee	<b>Dated:</b> 11 <sup>th</sup> October 2021
<b>Subject:</b> Adult Skills Education and Apprenticeship Service	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	<ul style="list-style-type: none"> <li>• People are safe and feel safe.</li> <li>• People enjoy good health and wellbeing.</li> <li>• People have equal opportunities to enrich their lives and reach their full potential.</li> </ul>
<b>Does this proposal require extra revenue and/or capital spending?</b> No	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b> Grant Support	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of: Director of Community and Children's Services</b>	<b>For Information</b>
<b>Report author: Barbara Hamilton: Adult Skills Education and Apprenticeship Service.</b>	

### Summary

This report will focus on three main areas they are as follows:

- Summary of the Internal COL Safeguarding audit and its recommendations
- Summary of the Apprentice small group Safeguarding conversations
- Update of Safeguarding policies and procedures
- Further Safeguarding actions for continued improvements

### Recommendation(s)

The main internal audit team findings recommendations and actions are as follows:

1. ASES Management should ensure that the ASES Addendum and Staff Handbook adequately references the key relevant requirements of the latest OFSTED Safeguarding inspection framework guidance, and that an updated version is circulated to all relevant parties.

Action Taken: OFSTED Safeguarding guidance is circulated to all key members of staff.

2. ASES management should provide evidence of the control in operation to help ensure that Tutors keep up to date with safeguarding requirements.

Action Taken: Tutor training and guidance is provided as part of the staff induction process.

3. ASES Management should introduce a mechanism within the annual review of the ASES Safeguarding Policy to ensure that it accords with the latest relevant guidance in respect of safeguarding.

Action Taken: Safeguarding meeting taken place by-weekly and is used to circulate relevant guidance in respect of Safeguarding.

4. ASES management should provide evidence that the service E-Safety Policy, referred to in ASES Newsletters and the Tutor Handbook, has been made available to all relevant parties to help ensure online safety.

Action Taken: E-Safety Policy and Newsletters are prepared and circulate to all learners and staff.

5. ASES Management should review information management arrangements to ensure that safeguarding is not negatively impacted by key staff absence.

Action Taken: Small team of Safeguarding leads and now in place.

6. ASES Management should introduce a mechanism to ensure that all staff complete the mandatory training, as identified on City Learning – for example related to Prevent.

Action Taken: Further discussion is needed to address this recommendation

7. ASES management should provide evidence that third party safeguarding requirements and responsibilities in respect of contracted service provision are adequately reflected in contract documentation, and that the wording seeks to mitigate the risks associated with potentially conflicting safeguarding policies.

Action Taken: Additional clause issued to external Providers to strengthen their Safeguarding responsibilities.

The recommendation listed above has been addressed.

Members are asked to:

- Note the report.

# Main Report

## 1. Background

The adult Skills and Education Service delivers a range of adult and Apprenticeship skills training. The training is carried in several different venues and working in different environments and with different groups of adults. The age of our learners ranges from 16 – 85 years old. Each learner presents different personal and professional challenges to the Service. It is therefore important that Safeguarding awareness and understanding is fully embedded into the teaching and learning processes.

The service had two separate and different reviews of its Safeguarding processes. The first review was based on the COL audit Safeguarding procedures.

The second examined the extent to which apprentices and learners were made aware of the Safeguarding internal procedures and whether they were able to confirm that they received and understood Safeguarding policies.

This review was conducted by a Safeguarding Ofsted Inspector. The purpose of this approach was to assist the Service to better understand the main Ofsted inspection priorities when inspecting Safeguarding. The approach that was taken was to schedule 'deep dive' discussion meetings with more than 90% of learners and apprentices.

The Scope of the review was to schedule individual discussions with apprentices in all of the apprenticeship groups. These groups were at different stages, ranging from about two months into the programme to imminent completion of the programme. Every discussion included safeguarding and Prevent topics. Previous educational / employment experience was included as well as topics linked to the curriculum.

## 2. The main review findings were as follows:

Clarify for apprentices and the staff who is to be regarded as the main DSO for the external provision. Confusion arises where apprentices perceive two, three or four possible options: work-place manager, tutor, manager of external provision, programme administrator.

- 1 On external provision, ensure that aspects of safeguarding and Prevent are revisited during the course, not just at induction. Clarify the role of the tutor and assessors in ensuring this happens routinely through the curriculum, and at reviews.
- 2 When, on external provision, apprentices are required to use their own computers for remote learning, clarify who is responsible for the training and how ASES knows the training is sufficient.

The main areas for Improvement identified in this review has been addressed.

**3. The Service's Safeguarding processes were reviewed as part of the COL internal audit process. The audit sought to assess the arrangements in place in respect of the following:**

- Prompt identification and communication of safeguarding requirements to all relevant parties.
- Implementation and maintenance of policies and procedures which align fully with safeguarding guidance.
- Arrangements for monitoring safeguarding compliance and ensuring that necessary corrective action is undertaken on a timely basis, including mechanisms for obtaining assurance that third party responsibilities are being met, for example those of external providers and non-City of London workplaces.
- Clear accountability, escalation and reporting arrangements to facilitate effective oversight of safeguarding activities; mechanisms to obtain assurance that activities are having the intended impact and that risks are mitigated to an acceptable level.

**3.1** The internal audit concluded that there is a strong focus on building relationships with learners to promote a culture of openness to encourage individuals to raise concerns with staff. When possible tutors and teachers are being encouraged to further extend the Safeguarding messages to be included in their Schemes of Work and their lesson plans.

**3.2** Important information such as the names and contact details of Safeguarding Leads are included in what is commonly known in the team as 'Safeguarding Card'. This information has been sent to all Apprentices. This process is to be extended to all learners, including, adult learner. There is a potential single point of failure for safeguarding arrangements within ASES.

**3.3** The audit identified an important area for concern which focused on the absence of the Lead Safeguarding officer. This was due to staff sudden sickness. In response to this level of concern a further 2 senior staff members were trained as Safeguarding Lead officers.

**3.4** It was clear from the audit that opportunities exist to strengthen controls to ensure the prompt identification and communication of safeguarding policy updates and amendments. For example, the recent Ofsted recommendation to schools and FE colleges for them to ensure that there are strong policy references to Sexual Harassment and Cyber Bullying. The Adult Skills Safeguarding policy was recently updated to include these references.

**3.5** The audit referred to the Adult Service inadequate request to external contractors demonstrate their understanding of the COL Safeguarding requirements. The auditors stated that 'copies of contractual agreements supplied for a sample of learning providers did not adequately reflect the responsibilities of each party for safeguarding.

- 3.6 The contractual agreements have now been amended to strengthen the Safeguarding responsibilities of the external Provider and the City of London Corporation.
- 3.7 Concerns were raised regarding the apprentice's line manager's responsibilities regarding Safeguarding awareness of important Safeguarding issues, managers own Safeguarding awareness as they may impact on the apprentices. Support arrangements are in place to provide appropriate guidance for all line managers who are working with apprentices.
- 3.8 The review of all Adult Skills and Education Services Safeguarding policies and procedures have recently taken place. A training plan has been put in place to support the qualifications and training for all staff and tutors. Staff and tutors have secured a level 3 Safeguarding qualification. The Service have assigned two managers as designated Safeguarding leads. An ASES manager has been given responsibility for the annual review of all policy documents. This includes Safeguarding/Prevent and the E-Safety policy.
- 3.9 The Adult Skills Service management has ensured that apprentice feedback on Safeguarding is first captured at Induction stage. The City of London police, tutors and Service managers provide a joint detailed Safeguarding/Prevent induction. Apprentice tutors have embedded different aspect of Safeguarding into their course delivery. Games, course assignments and quizzes are used to support the reinforcement of Safeguarding awareness to apprentices. Safeguarding workshops and quarterly newsletters have been prepared to continue to reinforce the apprentice's understanding and awareness of Safeguarding issues and policies.
4. All apprentices are sent via email a Safeguarding card with the details of 3 Safeguarding leads and contacts. In addition, the Safeguarding awareness reminder message is attached to the OneFile E-portfolio online system.

## Management Action Plan in Response to the COL internal Safeguarding Audit

Recommendations	Management Response	Action so far	Further Action Needed If appropriate
ASES Management should review information management arrangements to ensure that safeguarding is not negatively impacted by key staff absence.	A team of Safeguarding Leads (level 3 trained) are in place. Overall and deputy responsibility for Safeguarding Lead in place. ASES has an overall DSL, and three additionally trained and certificated staff in the DSL team.	Staff cover is in place to support the absent of key members of staff	An additional team member will be joining the Safeguarding DSL team in early August 2021
ASES Management should introduce a mechanism within the annual review of the ASES Addendum and Staff Handbook to ensure that it accords with the latest relevant guidance in respect of safeguarding.	The ASES Addendum and Staff Handbook will be reviewed annually, in July, and updated with the latest relevant guidance in respect of Safeguarding.	All policy information has been placed in the policy folder to be reviewed on an annual cycle before the start of each new academic year.	On reflection it has been decided that a separate staff Handbook containing specific information regarding Safeguarding policies will no longer be produced – Appropriate Safeguarding policies will carry all policies changed and amendments.
ASES Management should introduce a mechanism to ensure that all staff complete the mandatory training, as identified on City Learning.	All corporate training is an integral part of the Service Induction process	This requirement is included in the tutors and staff Induction pack	Action completed – Already in place

### 4.1 Current Position

In response to the Internal Safeguarding Audit report an Assurance Report was prepared and submitted to the director of DCCS.

The report provided the following Assurance. They were as follows:

- Revised and updated the Safeguarding Policy
- Appointed a team of safeguarding Leads – DSL
- Appointed an overall officer to take responsibility for Safeguarding
- Put in place an action plan for continued improvement
- A draft Safeguarding Assurance summary and response to the suggested action plan is also attached.

The newly revised Safeguarding policy has fully considered the changes that have taken place in terms of Health and Safety, Safeguarding and The Prevent agenda. The Health and Safety agenda has a stronger emphasis on the health and wellbeing of learners and staff and increased awareness of Mental Health support and its impact. The revisions in these areas are now incorporated into the revised Safeguarding/Prevent policy.

A new action plan is in place to support a range of new Safeguarding activities. These actions will address areas for improvement identified in the Safeguarding report. When completed these actions will go some way to further increase the rigor of the Adult Skills Service's Safeguarding responsibilities.

## **4.2 Staff Safeguarding responsibilities and planning**

**4.4** The audit report states that the ASES Safeguarding arrangements may be undermined where key information cannot easily be located/accessed in the event of staff absence.

**4.4** Assurance can be given that the ASES management has reviewed the information management arrangements and can confirm that there is a team of trained certificated Designated Safeguarding Leads (DSLs) in place. There is also one overall interim DSL COL employed senior level member of the ACL team to take responsibility for all Safeguarding activities.

**4.4** A recent review of the Safeguarding policy and Ongoing action plan for improvements has put in place a mechanism for ensuring that the Addendum and Staff Handbook draws on the updated Safeguarding advice.

## **4.6 Communication to Adult Skills and Education Staff and learners**

**4.7** The audit report states that requirements for Safeguarding arrangements have not been fully identified and communicated to all relevant staff. Assurance is given that the revised Safeguarding policy has been updated and amended to ensure that the Safeguarding policy outlines the full requirements of the latest Ofsted Safeguarding inspection framework. The revised policy is circulated to all staff and tutors.

**4.8** The audit report further states 'Safeguarding practices may be undermined where line managers of apprentices do not fully understand their Safeguarding responsibilities'. The request is for DCCS and HR management to consider how best to ensure that all line managers fully understand their Safeguarding responsibilities.

**4.9** Assurance is given that the E-Safety policy has been revised and amended. A summary document has been circulated to all learners. Discussions will take place regarding E-Safety as part of the course curriculum. All tutors will be encouraged to complete the Safeguarding training. They will also be encouraged to openly discuss R-Safety as part of their course introduction.

10. Evidence is available to show that the rewording of contracts with subcontractors is in place. The ACL team will continue to ensure that all external Providers of Services have the correct Safeguarding policy documents and furthermore that they are fully trained to the correct Safeguarding Standard.

**10.1** The City's contract wording will override all other Safeguarding action and practices. The recent amendments will ensure that the Service is able to 'hold Providers to account' for their actions.

**10.2** The monitoring and reviewing of Safeguarding policies and documents have taken place. The policy review schedule will be in place. The monitoring and review process will ensure that content updates for all safeguarding -related policies and procedures are completed by the due date.

**10.3** Assurance is given that the Subcontracted Providers' Safeguarding arrangements will continue to be monitored each month. Set questioning regarding health and safety and Safeguarding will be included in all review meetings with Subcontractors.

**10.4** A Safeguarding improvement plan will capture the detail of planned improvement activities. All improvement activities will be completed in a timely manner and tracked to their conclusion.

**10.5** Further assurance was given to confirm that the roles and responsibilities of the Adult and Community Learning Advisory Group will be further clarified. The Terms of Reference and the role of the Safeguarding link Steering Group member will be aligned to Safeguarding policy. The arrangements will be discussed and agreed.

Strategic implications N/A

Financial implications N/A

Resource implications N/A

Legal implications N/A

### **10.6 Risk implications**

10.7 The ASES management will ensure that risk management arrangements incorporate Safeguarding and that risk assessments are completed where/new increased Safeguarding risk are identified, for example the online course delivery risk assessment is in place.

10.8 Equalities implications - The ASES Safeguarding policy is fully compliant with the public Sector Equality Duty 2010.

This policy has been developed in accordance with the principles established in the following statutory and guidance documents for example, The Children Act 1989, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005 and was crossed reference

*ASES Equality and Diversity policy and the ASES Health and Safety policy*

## **11. Conclusion**

**11.1** The internal audit concluded that there is a strong focus on building relationships with learners so as to promote a culture of openness to encourage individuals to raise concerns with staff when possible. Tutors and teachers are being encouraged to further extend the Safeguarding messages to be included in their Schemes of Work and their lesson plans. Important information such as the names and contact details of Safeguarding Leads are included in what is commonly known in the team as 'Safeguarding Card'. This information has been sent to all Apprentices. This process is to be extended to all learners, including, adult learner.

**11.2** It was clear from the audit that opportunities exist to strengthen controls to ensure the prompt identification and communication of safeguarding policy updates and amendments. For example, the recent Ofsted recommendation to schools and FE colleges for them to ensure that there are strong policy references to Sexual Harassment and Cyber Bullying. The Adult Skills Safeguarding policy was recently updated to include these references.

**11.3** The audit referred to the Adult Service inadequate request to external contractors to demonstrate their understanding of the COL Safeguarding requirements. The current arrangements did not reflect the responsibilities of each party for safeguarding or the arrangements to mitigate the risk where there is conflict between safeguarding policies'

**11.4** The contractual agreements have now been amended to strengthen the Safeguarding responsibilities of the external Provider and the City of London Corporation.

**11.5** Concerns were raised regarding the apprentice's line manager's responsibilities regarding Safeguarding awareness of important Safeguarding apprentices. Support arrangements are being discussed with HR colleagues to provide appropriate guidance for all line managers who are working with apprentices.

**11.6** The review of all Adult Skills and Education Services Safeguarding policies and procedures have recently taken place. A training plan has been put in place to support the qualifications and training for all staff and tutors. Staff and tutors have secured a level 3 Safeguarding qualification. The Service have assigned two managers as designated Safeguarding leads

**11.7** The Adult Skills Service management has ensured that apprentice feedback on Safeguarding is first captured at Induction stage. The City of London police, tutors and Service managers provide a joint detailed Safeguarding/Prevent induction. Apprentice tutors have embedded different aspect of Safeguarding into their course delivery. Games, course assignments and quizzes are used to support the reinforcement of Safeguarding awareness to apprentices. Safeguarding workshops and quarterly newsletters have been prepared to

continue to reinforce the apprentice's understanding and awareness of Safeguarding issues and policies.

All apprentices are sent via email a Safeguarding card with the details of 3 Safeguarding leads and contacts. In addition, The Safeguarding awareness reminder message is attached to the OneFile E-portfolio online system.

**11.8** Although the main reviews of the ASES Safeguarding policies and practices is now concluded. The ongoing process of continuing to improve safeguarding awareness for all learners, will continue. There is still work needed to improve the Safeguarding awareness to apprentice line managers.

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