



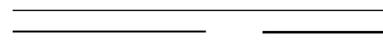
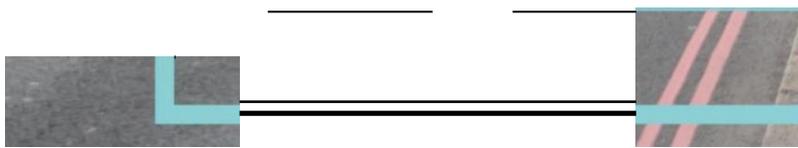
**CITY
OF
LONDON**

Adult Skills and Education Service

SAFEGUARDING /PREVENT POLICY

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CITY OF LONDON CORPORATION ADULT SKILLS AND EDUCATION SERVICE

Safeguarding young people and adults / Prevent policy

| Name | Area of responsibility | Phone | Email |
|------------------|-----------------------------------------|---------------|------------------------------------------------------------------------------------------------|
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| Barbara Hamilton | Head of Service | 07920703087 | Barbara.Hamilton@cityoflondon.gov.uk |

City of London Corporation Safeguarding Leads

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202 7332 3129

PREVENT Lead

David Mackintosh Head of Community Safety david.mackintosh@cityoflondon.gov.uk
020 7332 3484

City and Hackney Safeguarding Children Board (CHSCB)

Rory McCallum 020 8356 4042 rory.mccallum@hackney.gov.uk
www.chscb.org.uk

City and Hackney Safeguarding Adults Partnership Board

Jim Gamble 020 8356 5782 adultprotection@hackney.gov.uk
www.hackney.gov.uk/safeguarding-adults-board

Police and Prevent contacts

Sadik Miah Community Policing 020 7601 2222 sadik.miah@city-of-london.police.uk
City of London Police 07903 305 166
or dial 999

Confidential anti-terrorist hotline 0800 789 321

Counter-terrorism security advisers CTS@city-of-london.police.uk

Department for Education contact to raise concerns about extremism

Helpline 020 7340 7264 counter.extremism@education.gsi.gov.uk
UK

1)Safeguarding in the City of London Corporation

Safeguarding is the statutory requirement to promote the welfare of children and adults at risk, protecting them from harm and neglect including self-harm and self-neglect. It is a duty of the City of London Corporation (City Corporation) to ensure that children and adults are safeguarded from harm. Every employee of the City Corporation has a responsibility to safeguard the welfare of children, young people and adults at risk, whatever the role of the individual, or the City Corporation service or department they work in. The City Corporation's safeguarding policy provides guidance for all City Corporation staff, members and individuals, consultants and agencies contracted by the City Corporation who may come across concerns regarding the safeguarding and protection of children, young people and adults at risk within the context of their work.

2)Adult Skills and Education Service (ASES)

As its contribution to the City Corporation strategies, the adult education curriculum is focused on:

- providing those who are economically active but unemployed with the knowledge and skills to gain sustainable employment through the development of their English, mathematics, ICT and employability skills
- providing those with low levels of English and mathematics skills to develop these skills, which allows them to progress in their own lives and support the learning of their children
- supporting those who are economically inactive to develop their physical and mental resilience to maintain their health and independence
- providing training and supporting apprenticeships, mainly for 16-18 year olds, delivered in-house and through sub-contractors, at qualification levels, 2,3 and 4.

Apprentices employed by the City Corporation and trained by them are completely covered by the City Corporation's Safeguarding Policy. Apprentices employed by the City Corporation but trained by an external organisation are covered by both the City Corporation's Safeguarding Policy and by that of the external training organisation they attend. Apprentices employed by external organisations but trained by ASES are covered both by the safeguarding policy of their employer and by that of the City Corporation.

3)The purpose of this policy document

This policy document updates previous versions of the policy, and highlights the extension of the Prevent guidance to include a greater focus on protecting learners from increasing levels of extremism in all its forms, including hate crimes, and threats to groups with protected characteristics such as aspects of gender. It also identifies the increasing prevalence of challenges to mental health, following the COVID pandemic.

The updated document provides guidance to ASES staff about their roles and responsibilities in relation to the protection of children and adults at risk in the range of different settings where our learners study. Learners within all of the safeguarded groups face the risk of abuse. It is the duty of every member of staff to prevent abuse and to take effective action when abuse is suspected or disclosed. Safeguarding incidents could happen anywhere and at any time and could be perpetrated by a range of individuals including staff, other learners and individuals external to the college, including family and friends and carers.

This policy has been developed in accordance with the principles established in the following statutory and

guidance documents:

The Children Act 1989

Safeguarding Vulnerable Groups Act 2006

Care Act 2014

Mental Capacity Act 2005

Working Together to Safeguard Children July 2018

Keeping Children Safe in Education - Statutory guidance for schools and colleges. September 2020, updated January 2021, DfE

Inspecting Safeguarding in Early Years, Education and Skills Settings 2018 Ofsted

Counter Terrorism and Security Act 2017

Updated Prevent Duty guidance for further education institutions in England and Wales HM Government 2019

City of London Corporation Safeguarding Policy 2020

Work-based learners and the Prevent statutory duty guidance for providers

September 2018, DfE

Equality Act 2010

Human Rights Act 1998

ASES will have available for reference, where appropriate, such as in Family Learning settings:

Departmental advice:

‘What to do if you are worried a child is being abused- advice for practitioners’ 2015

‘Sexual violence and sexual harassment between children in schools and colleges’ 2021DfE

Cross reference to:

ASES Equality and Diversity policy

ASES Health and Safety policy

ASES Learner Support and Welfare policy

4)The aims of ASES safeguarding and adults at risk policy

Safeguarding encompasses a range of activities aimed at protecting an adult, child or young person’s welfare and right to live safely and free from abuse and neglect.

This Policy aims:

- To provide a safe environment for children and adults at risk in which to learn
- To ensure the safe recruitment of staff and the maintenance of a single central record
- To protect children and adults from harm by identifying those at risk and taking action to ensure they are kept safe
- To protect learners by assessing risk in relation to all activities, including a focus on the prevention of being drawn into radicalism, extremism and activities such as substance abuse, knife crime and County Lines
- To provide guidance for staff on the implementation of safeguarding measures and on the internal procedures to be followed in cases of suspected abuse
- To promote understanding and build relationships by working with the Corporation and other agencies in order to develop multi- agency working and information sharing
- To establish procedures for monitoring and evaluating the effectiveness of the safeguarding arrangements.

5)Safeguarding children and adults at risk

The Children Act 1989, updated by the Care Act 2014 defines a child as a person up to their 18th birthday and up to 25 years for those with special education needs and disabilities (SEND). Young people or learners includes those up to 25 years. An 'adult at risk' or a 'vulnerable adult' is any person who is aged 18 years or over and at risk of abuse or neglect because of their need for care and or support and because they are not able to protect themselves from harm or significant exploitation.

6)Safeguarding children/young people

Safeguarding and promoting the welfare of children/ young people is defined as:

- protection from maltreatment
- preventing impairment of children's / young people's health or development
- ensuring that children / young are growing up in circumstances consistent with the provision of safe and effective care and support.
- taking action to enable all children to have the best outcomes.

7)The kinds of harms that can be experienced by young learners and adults at risk:

- neglect
- physical abuse
- sexual abuse, including sexual violence and harassment
- emotional abuse
- bullying, including cyber bullying and prejudice-based bullying
- hate crimes, such as racist, disablist, misogynistic, homophobic or transphobic abuse
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- the impact of digital technologies on sexual behaviour, such as sexting and cyber bullying
- teenage relationship abuse, including peer on peer abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity, County Lines and drug-related activity
- domestic violence
- female genital mutilation (FGM)
- forced marriage
- fabricated or induced illness
- declining mental health
- poor parenting
- other issues not listed here but that pose a risk to children, young people and adults.

All members of staff are required to acquaint themselves with the most recent copy Keeping Children Safe in Education, DFE 2020, updated January 2021, which identifies in greater detail different types of abuse, risks and harms.

8)The Prevent Duty

The Prevent duty contributes to the government's strategy to reduce the risk to the UK, and its interests overseas, from terrorism, so that people can go about their daily lives freely with confidence. The duty requires educational

establishments to have regard to the need to prevent people from being drawn into terrorism, by reducing the risks of radicalisation and ensure individuals are provided advice and support.

Radicalisation is the process whereby a person comes to support extremist views, and is drawn into activity such as terrorism or hate crimes, which in this context is seen as opposition to fundamental British values, defined as:

- The rule of law
- Democracy
- Individual liberty
- Mutual respect
- Tolerance of different faiths and beliefs

CHANNEL

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism, through contact with a local Channel and Prevent co-ordinator.

The contacts for referrals within the corporation are provided at the start of this policy document.

The revised Prevent Duty Guidance (DfE 2019) summarises the **requirements** of colleges in terms of the main following general themes:

- The development of a risk assessment that includes all settings, identifying specific harms such as the prevalence of local criminal activity including knife crimes, county lines and drug abuse.
- Close partnerships with Prevent co-ordinators (as identified on page 2).
- Staff training to ensure governors, principals, leaders and staff use opportunities in the curriculum to educate learners about British values and have particular regard to the protected characteristics of learners as identified in the Equality Act 2010.
- Policy to provide welfare and mental health support to learners
- An IT policy to use filtering and other measures to prevent learners being drawn into terrorism or hate crimes

NOTE: FGM mandatory duty for all staff in educational setting

Teachers and other professionals must personally report to the police where they discover that an act of FGM appears to have been carried on a young person up to the age of 18. Where a learner is over 18, the concern should be raised through the usual safeguarding arrangements. (see page 23 in KCSIE 2020 for more detail).

9)Mental Capacity

Guidance to colleges in Keeping Children Safe in Education (section 41) identifies the requirement to have regard to the Mental Capacity Act, 2005. If in doubt about a learner's capacity to make decisions, for example as a result of extreme temporary anxiety, or temporary psychotic episodes, arrangements should be made for an assessment of the extent to which a learner lacks sufficient mental capacity.

10)Guidance on Policy Implementation

This section clarifies the responsibilities of all staff and steering group members. It sets out what members

of staff should do if they have any safeguarding concerns. Page 2 of this document lists the names and details of safeguarding staff and the contacts in the City Corporation.

It is the responsibility of all employees to be alert to possible indicators of abuse and to raise concerns to a Designated Safeguarding Officer. See Annex 1 for ASES reporting pro-forma.

11) Responsibilities of the ASES Steering Group

- The ASES steering group identifies a designated member with specific responsibilities for the safeguarding of young people and adults at risk and the Prevent Duty, alongside the Equality Act and the Human Rights Act
- The steering group identifies a deputy in the case of absence of designated lead
- The designated member and other members receive safeguarding and Prevent training, updated annually.
- The designated member liaises with the Principal and the Designated Safeguarding Lead over matters regarding safeguarding young people and adults at risk to ensure that:
 - the College has guidelines and policies for children/young people and adults at risk which are consistent with safeguarding, health and safety and Prevent duty statutory requirements.
 - The college follows safer recruitment practices.
 - The steering receives a monitoring report at each meeting, which includes an incidents report
 - the steering group reviews the College safeguarding and Prevent policy on an annual basis
 - the steering group liaises with, and reports to the main Corporation Board.
 - If appropriate, steering group members engage with tutors and learners and report back to the board.

12) Responsibilities of ASES senior staff

ASES senior staff should ensure that:

- they have put in place a strong, robust and proactive response to safeguarding and Prevent duty requirements, ensuring policies are up to date
- they have appointed a senior staff member as the Lead Designated Safeguarding Officer, with a deputy in case of staff absence
- all Designated Safeguarding Officers are trained to the appropriate level, and updated at least once a year
- they receive annual, updated safeguarding young people and adults at risk and Prevent training
- all staff who have contact with learners, including IAG officers, additional support staff, welfare officers, tutors and assessors are required to acquaint themselves with the key safeguarding documents, and receive relevant updates
- they have put in place effective safeguarding and staff response to incidents arrangements, that are well understood by everyone in the setting.
- they have arrangements in place to monitor the effectiveness of the safeguarding, health and safety and Prevent policies they prepare a safeguarding and Prevent monitoring report to each meeting of the ASES steering group
- they arrange for support to ASES staff members of staff who have been distressed by a safeguarding case.
- they have put in place arrangements which set out clearly the processes for sharing information with other multi-agency professionals including the Local Safeguarding Children Board or the Local Safeguarding Adults Board, as appropriate.
- they have an agreement with the City Corporation for assessment under the Mental Capacity Act, for any learn who may lack capacity to make decisions.
- tutors and assessors receive guidance and training to enable them to integrate aspects of the Prevent

duty into their learning programmes

- tutors and assessors receive guidance about the possible consequences of Covid for the mental health and well-being of learners, particularly the most vulnerable
- tutors and assessors know how to reinforce digital safety measures
- health and safety procedures are followed in all settings, including in particular, the different contexts for the apprenticeship programmes

13) Responsibilities of ASES designated safeguarding officers

ASES designated safeguarding officers should ensure that:

- learners know how to raise safeguarding issues and understand the process for doing so
- learners know that they will be listened to, and that their concerns will be taken seriously
- staff in all settings have had appropriate, up to date training in safeguarding, health and safety and Prevent and that records of training and attendance are maintained
- the single central record of DBS and pre-appointment checks is up-to-date and accurate, including subcontractors' practice
- action taken in response to any safeguarding concerns, is effective and in line with ASES and City Corporation guidelines
- ASES staff are advised appropriately about multiagency partner contacts in other authorities in order to prevent learners from further harm. These include Channel arrangements.
- any allegation of abuse made against a tutor or other member of staff or volunteer is responded to quickly, in a fair and consistent way that provides effective protection for the learner and at the same time supports the person who is the subject of the allegation.
- Records are kept of any young people or adults identified as at risk and any actions taken are monitored.

14) Responsibilities of ASES tutors and assessors

ASES Tutors and assessors should:

- fully comply with the college's safeguarding and Prevent procedures by reporting all concerns or possible indicators of abuse to a College Designated Safeguarding Officer.
- attend all safeguarding on-line or face to face safeguarding training events.
- acquaint themselves with the most recent safeguarding and Prevent guidelines, and documents, and any subsequent updates.
- fully comply with the College's health and safety policies and procedures, including advising their line manager of any injury or incident.
- ensure at induction, and on subsequent occasions identified in their schemes of work, learners know who their safeguarding contact is and how to contact them.
- use every opportunity, starting with induction to protect learners, and try to prevent abuse by raising their awareness of increasing harms, for example, local incidents of drugs and knife crime
- pay attention to learners' welfare, well-being and mental health.
- promote British Values, for example, by treating everyone fairly with dignity and respect, challenging prejudiced behaviours, and by encouraging learners to do the same.
- be alert to signs of abuse and grooming or to signs of fragile mental health.
- be vigilant in advising learners about ways to protect themselves against cyberbullying, abuse and extremism, and implement ASES on-line policy.
- make sure not to share personal information and personal e-mail addresses with others.

ASES staff on apprenticeship programmes must:

- ensure that employers know that they are responsible for health and safety while apprentices are on the employers' premise.
- take reasonable steps to check that the employer manages risks effectively.
- provide employers with a safeguarding briefing when new learners arrive.
- inform employers that they must alert ASES if any safeguarding and/or health & safety concerns.
- provide guidance, either through the assessor or through the safeguarding officer.
- provide the employer with a safeguarding report form, ask the person responsible to complete it or support him/or her with the process.
- advise on any steps to be taken to safeguard the young person.

If tutors or assessors notice safeguarding or health and safety issues, they must pass concerns to the employer and contact the safeguarding officer.

Given the increase in remote learning during COVID and the requirements of the Prevent duty, tutors and assessors should take steps to reduce **online risks** to learners by:

- warning them of the danger of being exposed to illegal, inappropriate or harmful material, such as fake news, pornography, racist, misogynistic or extremist radical views.
- warning them of the danger of being subjected to harmful online interaction with other users, such as adults posing as young people.
- explaining to them how personal online behaviour may cause harm: for example, making, sending or receiving explicit images, or online bullying.

15) Response to safeguarding disclosures

ASES staff should follow these guidelines where a young person or adult at risk discloses issues of concern:

1. Listen carefully and take notes.
2. Question without pressure to be sure that what is being said is properly understood.
3. Avoid any leading questions: focus on the facts if you can.
4. Reassure the individual concerned that s/he has done the right thing
5. Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it.
6. Do not promise that the matter will remain confidential.
7. Do not attempt to investigate the concerns yourself.
8. Alert your safeguarding officer immediately
9. If you cannot raise your allocated or lead safeguarding officer and the matter is urgent, you contact one of the other ASES safeguarding officers or, a City Corporation safeguarding contact, or the Head of Service, or, if sufficiently serious, the police.
10. Record your concern on the ASES on-line safeguarding form (Annex 1) as soon as you are able to.
11. Co-operate if the safeguarding officer involves you in recording action taken and outcomes.

Anyone with a concern about another staff member, should notify the Head of Service, Barbara Hamilton, Barbara.Hamilton@cityoflondon.gov.uk . If you have a concern about the Head of Service, contact the City Corporation Local Authority Delegated Officer (LADO) (see page 2 of this document for contact details).

16) Policy monitoring

Senior staff will provide reports to each ASES Steering Group meeting to outline the actions they have taken to implement their policy and provide evidence of their impact. Where they have identified shortfalls in expectations, they will prepare an action plan for review at the next meeting.

They will monitor provision to ensure that:

- staff at all levels, and steering group members, receive safeguarding and Prevent training at an appropriate level, and that this is updated annually.
- policy guidance is up to date and the ASES Safeguarding Young People and Adults and Prevent policy is reviewed and updated annually.
- the ASES steering group receives an update on the monitoring of safeguarding at every meeting.
- all staff have copies of the most up to date policy and supporting guidance documentation and know what their specific responsibilities are.
- safer recruitment policies are fully implemented, including pre-employment checks and maintenance of the single central record.
- all staff follow the requirements in the event of disclosure or the detection of possible abuse or radicalisation, and extra guidance is given in the event of any errors or misunderstandings.
- appropriate guidelines are followed in the event of a disclosure about a staff member.
- records of any Safeguarding and Prevent incidents are maintained in an annual log and reported to the ASES Steering Group in every meeting.
- information about young people and adults at risk is recorded and shared as appropriate with named multi-agency partners.
- tutors and assessors can demonstrate how they have used the curriculum to inform and protect learners
- learners know how to keep themselves safe on-line and how to protect themselves from being drawn into activity such as hate crime or terrorism.
- learners know who to contact in the event of any concerns.
- learners have an understanding how to behave with respect towards others and demonstrate this in lessons and in on-line contact with other learners
- Designated safeguarding officers, tutors and assessors follow the policy responsibilities in respect of apprenticeship provision
- appropriate action is taken to ensure that safeguarding arrangements for apprentices are in place, to avoid possible duplication in external settings.

Annex 1: ASES Safeguarding/Prevent Report Form

Please complete as much of this form as you can but don't worry if you do not have all details to hand. They can be sorted out later. The most important is to record the learner's name, the reason why you are raising a safeguarding issue, and your details.

1 Learner details

| | | | |
|---------------------|--|----------------------------|--|
| Learner name | | Date of birth age | |
|---------------------|--|----------------------------|--|

| | |
|-----------------------------------------------------------------------------------------------------|--|
| Learner address | |
| Learner contact number mobile/home | |
| If you know, please give details of name(s) of household members and relationship(s) to the learner | |

2 Information relating to the safeguarding/prevent incident or allegation

| | |
|---------------------------------------------|--|
| Date, time and context of disclosure | |
|---------------------------------------------|--|

| | |
|-------------------------------------------------------------------|-----------------|
| What did the learner tell you and/or what did you observe? | |
| (Continue on reverse or use separate sheet as necessary) | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| Is the learner aware that this referral is being made? | Yes / No |

| | |
|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| In your opinion, is the learner at risk of harm or abuse? <i>[to tick boxes double click on box and select checked]</i> | <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>Low</p> <input type="checkbox"/> </div> <div style="text-align: center;"> <p>Medium</p> <input type="checkbox"/> </div> <div style="text-align: center;"> <p>High</p> <input type="checkbox"/> </div> </div> |
|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

3 Staff member details

| | |
|--------------------------------|--|
| Staff name | |
| Email | |
| Contact number | |
| ACL/Apprenticeship area | |

4 To be completed by a member of the safeguarding team

| | |
|---------------------------------------------------------------------------|--|
| Name | |
| Date & time of referral to you | |
| Initial outcome of the referral and any action taken | |
| Details of any onward internal ASES referral | |
| Name of person taking internal referral | |
| Date & time of internal ASES referral | |
| Details of any onward external referral | |
| Name of person taking referral | |
| Date & time of external referral | |
| Any communication requirements, eg interpreting needs | |
| Has consent been sought from parents/ carers before making this referral? | |

| 7. HAS THERE BEEN PREVIOUS STATUTORY OR SPECIALIST INVOLVEMENT? | | | | | |
|---------------------------------------------------------------------------------------------|-----------|--------------------------|------------|--------------------------|-------------------------------------------|
| <i>[to tick boxes double click on box and select checked]</i> | | | | | |
| Children's Social Care | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Child and Adolescent Mental Health Service CAMHS | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Special Educational Needs or Disability | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Borough School Attendance Service / Education Welfare Service | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Specialist Health | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Prevent | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Adult Services – <i>(Mental Health /Drug or Alcohol Abuse /Disability /DV /Housing)</i> | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Youth Justice Service | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Police/Probation/ | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| New to Borough | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |
| Other | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known <input type="checkbox"/> |

