WESTMINSTER ADULT EDUCATION SERVICE

SAFEGUARDING AND PREVENTION OF RADICALISATION POLICY

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Westminster Adult Education Service

Policy covers the Safeguarding of Children, Young People and Vulnerable Adults and the Prevention of Radicalisation

1 Purpose

- The term 'safeguarding children, young people and adults at risk' encompasses both child protection and our preventative approach to keeping young people and adults safe. The statutory guidance 'Keeping Children Safe in Education (KCSIE) 2021', Working Together to Safeguard Children 2018 andthe 'Safeguarding Vulnerable Groups Act2006', The new Ofsted Education Inspection Framework 2019, are pieces of legislation that have supported this policy. (*See appendix 5 for glossary of terminology)*

- KCSIE applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021 with a particular emphasis on Sexual violence and sexual harassment between children in schools and colleges

- A separate e-Safety policy sits alongside this policy that reflects the UK Council for Internet Safety (UKCIS) and the updated guidance following the KCSIE updated legislation 2021.

- During Covid-19 WAES made amendments to this policy by creating a Bereavement Procedure thatsits within safeguarding. This procedure will be followed in the event of a learner bereavement and will act a framework to support learners and tutors. (*See appendix 1 for bereavement procedure)*

- The Service aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children, young people and vulnerable adults. WAES uses a'whole college approach 'to safeguarding young people and vulnerable adults.

1.1 Scope

- This policy applies to all staff (including sub-contractors delivering teaching and learning on behalf of WAES)
- It applies to learners, carers and volunteers who may be working with children (i.e. those aged under 16), young persons (i.e. those aged 16 to 18 at risk of abuse sexual violence or sexual harassment)
- It applies to all vulnerable adults as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged over 18 who because of mental or other disability, age or illness are or may be unable to take care of themselves.

- It applies to any learner who may be unable to protect themselves against significant harm or exploitation, the service encounters through its teaching and learning activities as well as through its community based and outreach learning activities, Apprenticeship and Distance Learning provision.

- However, it is important to be aware that following amendments to the Safeguarding Vulnerable Groups Act 2006, by the Protection of Freedoms Act 2012, adults are no longer categorised as vulnerable because of their personal attributes, characteristics, or abilities. An adult is only considered 'vulnerable' if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing, or dressing. Adults with certain disabilities may also be categorised as vulnerable depending on

legislation and care that sits alongside the individual.

- This policy seeks to support the above and to offer assurances to both staff, learners, carers, volunteers, and visitors that, through its implementation, the Service seeks to protect children, young people, and vulnerable adults and to keep them safe from harm when in contact with learners and staff (whether acting in a paid or unpaid capacity through volunteering).

- This policy alongside Equality and Diversity (following the Equality Act 2010 and the Human Rights Act 1998) will take positive steps to prevent discrimination, also adhering to the Keeping Children Safe in Education 2021 will take due diligence, engage in early help and closely monitor the following priority groups of learners.

1.2 Priority Groups

- Disabled Children and Learners and those who have special educational needs (LDD) learnersor medical condition
- Learners who have special educational needs (they may have a statutory Education, Health and Care Plan)
- Learners with medical conditions
- Learners who are either looked after or are classified as in leaving care
- Older learners (vulnerable)
- Learners with specific 'Mental Health Conditions' who are supported or who are living alongside NHS support workers in hospitals or through 24/7 supported accommodation.
- Learners of different religions and beliefs
- Learners who are ex-offenders
- Learners who are aged 16-18
- Any allegation of peer-on-peer abuse (16-18) will be investigated, recorded and the victim will be monitored and supported through safeguarding
- Any consistent banter learner on learner will be investigated and recorded
- Any disclosure will trigger children services
- Learners who are showing signs of being drawn in to anti-social or criminal behavior, including gang involvement and association with organised crime groups
- Learners who are at-risk of sexual exploitation, sexual slavery, exploitation of organ trafficking (the unseen form of human trafficking)
- A learner at-risk through FGM
- A learner who is frequently missing/goes missing from care or from home
- A learner who may be at risk of modern slavery, trafficking or exploitation
- A learner who may be Is at risk of being radicalised or exploited (PREVENT)
- A learner who is in a family circumstance that is presenting challenges for the child, such asdrug and alcohol misuse, adult mental health issues and domestic abuse
- A learner who is misusing drugs or alcohol themselves
- A learner who has returned home to their family from care
- A learner who is a privately fostered child.
- A learner who may be suffering from abuse or neglect sexual violence or sexual harassment

2 Aims and Objectives

2.1 The Service wishes to ensure that it maintains the highest possible standards to meet its social, moral, and legal responsibilities to protect and safeguard the welfare of children, young people, and vulnerable adults with whom the Service's work brings it into contact, whilst recognising that it cannot act "in loco parentis". Ultimate responsibility will continue to rest with parents, carer, or guardian. In the event that a learner is under the care of the local authority, steps will be taken to involve Social Services or external support agencies.

2.2 While it is impossible to ensure that a child, young person, or vulnerable adult would never come to any harm, the adoption of this policy, implementation of training for staff and associated guidelines aims to facilitate the management of the risk associated with the duty to protect such individuals.

2.3 The aim of this policy is to highlight the *eight* areas that form the basis of the Service's approach tosafeguarding the wellbeing of children, young people, and vulnerable adults and to set out a code of practice (see Appendix 1) for all staff, learners, carers, and volunteers who may work with them.

1. Ensure all relevant safeguards are in place by completing rigorous SafeguardingRisk Assessments
2. Ensuring all Recruitment, Selection and Employment Procedures are in place through oursafer recruitment process
3. Ensure we deal with all suspicions or allegations of abuse immediately and consistently
4. Ensure that we are alert to any form of abuse or neglect and clearly understand the priority groups of learners who could be attached to WAES.
5. Ensuring the prevention of radicalisation is embedded into WAES curriculum and staff areaware of the signs of radicalisation
6. Made it clear that safeguarding child protection policies should also include procedures for dealing with peer-on-peer abuse
7. Ensure we have a standalone e-safety policy and procedures for dealing with peer-on-peer abuse.
8. Ensure training is in place and staff and learners are consistently updated, to include Safer Recruitment and Selection process, safeguarding to include e-safety, peer on peer abuse, healthy relationships, and The Prevent Agenda

3   Responsibilities

Safeguarding is everyone's responsibility, all managers, and staff. All Managers have the responsibility to ensure that this policy is understood and followed by staff.

3.1 Safeguarding Officers will support
- Parents or carers with young children at risk of harm (nursery)
- Any group or individuals presenting violent or extreme ideologies
- Individuals in abusive or inappropriate relationships
- Any forms of abuse or neglect. This would include physical abuse, emotional abuse, sexual abuse or exploitation and neglect and coercive control
- Any form grooming (in person, online, by phone, etc)
- Any form of bullying to include cyber-bullying
- Individuals who are self-harming or at-risk to self or others (mental health)
- Individuals who have disclosed being a victim of up skirting
- Individuals who may have committed a crime
- Any forms of exploitation including sexual, financial, and criminal exploitation
- Any Home Office / immigration related issues
- Individuals who may be experiencing homelessness or are seeking refuge
- Any form of victimisation and prejudice due to race, gender, sexuality, faith and belief or disability
- Any form of substance / alcohol or drug misuse
- Concerns linked to eating disorders

- Honour-based violence which will also include female genital mutilation (FGM)and forcedmarriage
- Sexual violence and sexual harassment between any person under 18 Learners and the court system or with family members in prison
- Criminal exploitation such as county lines
- Learners under 18 at-risk of homelessness
- Learners at-risk through section 2 or 3 of the Mental Health act
- Will put in place any additional safeguarding systems to support the vulnerabilities of any learner with SEND disabilities
- The prevention of radicalisation (PREVENT)

3.2 Safeguarding Leads will
- Take any Safeguarding allegation seriously
- Ensure that all victims will be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting any form of bullying, abuse, sexual violence, or sexual harassment
- A standalone e-safety policy is in place. Any low-level concerns will be monitored and addressed as per learner behaviour / e-safety policy
- When dealing with any of the above, Safeguarding Officers will collaborate with external organisations or agencies as appropriate.
- Will support and monitor any learner including learners who are on Distance Learning courses, Apprenticeship programmes or short courses. This will include leasing with external Assessors or Employers.

   Anything which causes WAES to be concerned that any child, learner, or member of staff might be at risk of significant harm because of one or more of the above, will automatically trigger safeguarding partner arrangements to be put in place.

3.3 WAES is committed to providing a secure environment for all members of the Community. We recognise the positive contribution we can make towards the Prevent strategy: *"Supporting vulnerable individuals who are being targeted and recruited to the cause of violent extremism."* We will continue to empower all our learners to create communities thatare more resilient to extremism and protecting the well-being of learners or groups who may be vulnerable to being drawn into violent extremist and criminal activity. We will continue to promote and reinforce shared values: to create space for free and open debate as well as providing support for learners who may be at risk.

3.4 WAES is equally committed to creating a safe and welcoming learning environment for all. It is part of our customer service to ensure that all Learners, Visitors, Staff and Volunteers always wear an identification badge. In addition, all visitors and guests must sign in at Reception and follow the Safeguarding Policy for Guests and Visitor. This summary document can be found at each Reception Location across each site. WAES has developed a culture of challenging any individual who is not wearing identification badges (ID) across all centres. If learners have forgotten their ID, a paper identification badge will be issued from reception.

3.5 WAES has dedicated 'Mental Health First Aid' staff who are aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. Where appropriate referrals are made to external support organisations or support given through the NHS mental health team.

3.6 WAES will not allow the use of any ICT in the learning centres for any person who are not enrolled, after a one-month period. Extended periods will be negotiated through the Course Leader. (A one-month period allows for completion of work or re-take submissions)

3.7 WAES acknowledges the importance of challenging inappropriate behaviours between peers that are abusive in nature. We acknowledge that downplaying certain behaviours, for example the dismissing of sexual harassment as "just banter", or "just having a laugh", or "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours. This creates an unsafe environment for learners and in worst-case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

3.8 A manager or Tutor will always accompany any guest speaker, who is invited into the service.

3.9 Any information about concerns that do not meet the harm threshold. This includes understanding what a low-level concern is and making the link between low level concerns, staff code of conduct and safeguarding policies, will be flagged immediately and recorded.

3.10 In the case of room hire, the Service will take measures to ensure the nature and people involved are not in potential breach of this policy or the Prevent Agenda. If room hire occurs this will be administered through Health and Safety and monitored daily. (Currently we do not have any room hire)

4 IMPLEMENTATION

4.1 Risk Assessment

4.1.1 All staff that intend to, or may be put in the position of, working with children, young people orvulnerable adults should ensure that they fully understand the implications of this policy beforewriting any scheme of work, taking part in any teaching or assessment activity, planning an
event or external visit or any 'other' learner centred activity (internal or external)

4.1.2 A designated individual should complete a risk assessment before designing a new or making changes to an existing programme of study or scheme of work, planning an event or visit and any other activity involving children, young people or vulnerable adults.

4.1.3 All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also act as a prompt to consider alternative working practices and putting in increased controls or support if identified.

4.2 Recruitment, Selection and Employment Procedures

4.2.1 The Service will take all appropriate steps to ensure that unsuitable people are prevented from working with children and vulnerable adults.

4.2.2 Where the risk assessment has identified that learners or staff are likely to have regular contact with or encounter children, young people or vulnerable adults (which might include regular processing of information), rigorous checks into their eligibility will be required. Such processes will be compliant with the Service's Equality and Diversity and Inclusivity policy.

4.2.3 The Service is registered through Westminster City Council with the Disclosure and Barring Service (DBS) and will ensure that any member of staff or any learner who will have substantial contact with children, young people or vulnerable adults will be checked for relevant criminal convictions. Staff who are teaching learners aged between 16 and 18 will

automatically be required to have in place a DBS check.

4.2.4 The Service has a duty to comply with the Safeguarding Vulnerable Groups Act 2006and will ensure that any member of staff or any learner who will participate in regulated activity will be checked in line with DBS. HR will ensure that staff have a standard or enhanced DBS check. The Service will also comply with its ongoing duty to refer relevant information to the DBS.

4.2.5 The service will assess all DBS outcomes sensitively and HR alongside The Head or Service (Principal) have the right to refuse employment depending on time spent and nature of theconviction.

4.2.6 HR will update a single central record and ensure that all pre-employment checks and training are completed prior to staff starting at WAES.

4.2.7 All learners will be asked about any criminal convictions they hold during the admissions / enrolment process. If required a 'risk assessment' may be created, alongside regular monitoring checks put in place.

4.2.8 If a learner is under 18, we will require two emergency contact numbers at the enrolmentstage.

4.2.9 If a learner is a vulnerable adult, we will require parental or next of kin details, alongsidedetails regarding their carer, carer organisation or key worker.

4.2.10 Under no circumstances will a WAES volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity

4.2.11 If a learner is living under supported accommodation under the Mental Health act legislation, reviews and a monitoring process will be put in place.

4.3 Dealing with suspicions or allegations of abuse

4.3.1 Concerns for the safety and wellbeing of children, young persons or vulnerable adults could arise in a variety of ways and in a range of different settings. For example, a child or vulnerable adult may disclose or display signs of abuse; someone may hint that a child is at risk or that a colleague is an abuser; or an individual may witness or hear about abuse in another organisation. It is essential to act quickly and professionally in all cases of suspected abuse.

4.3.2 Any allegation by a child, young person or vulnerable adult against a member of staff, another learner or a volunteer must be reported immediately to the relevant designated individual who has responsibility under this policy. In dealing with any such allegation the Service has a duty of care both to the child, young person or vulnerable adult concerned and to the member of staff, learner, or volunteer against whom the allegation is made. HR would then refer onto to the Local Authority Designated Officer (LADO).

4.3.3 Any allegation against staff contracted through the service will be investigated. HR will manage the investigation this will be reported directly to the principal. (As above)

4.3.4 As part of their whole College approach to safeguarding, WAES will promote an open and transparent culture in which all concerns about all adults working in or on behalf of WAES (including agency staff, volunteers, and contractors) are dealt with promptly and appropriately.

4.3.5 WAES will respond to all reports and concerns of child-on-child or adult sexual violence and

sexual harassment, including those that have happened outside of the college premises, and or online

4.3.6 WAES has a dedicated child protection officer who manages all safeguarding cases identified in thetwo college nurseries or any child protection referrals for learners who are under 18.

4.3.7 All learners who are under 18 and on study programmes, have a review of achievement every six weeks, alongside the teaching team and ALS. Any poor learner behaviour is monitored, if concerns linked with changes in behaviour or nonattendance at WAES is reported directly to a safeguarding officer. Each review monitors progress and assesses if increased support structures are required

5 Training and support

5.1 The Service will provide appropriate guidance and training on this policy and its application to all staff and governors.

5.2 Mandatory training is required for all staff to complete as part of the induction process.

5.3 Learners will receive information on Safeguarding and Prevent as part of the WAES learner Induction process.

5.4 Staff will receive update training annually; training will be delivered every two years, unless changes in legislation or key priorities occur, such as e-Safety, Health Relationships, Prevent and how staff identify and refer learners etc.

5.5 Safeguarding Leads will receive training every two years, in line with statutory guidance.

6 Procedures

6.1 If staff are concerned about the well-being of a child or learner and are concerned that there may be a safeguarding issue, they should inform one of the designated Safeguarding Officers immediately.

6.2 Staff must discuss concerns directly with a designated safeguarding officer who will email via the safeguarding@waes.ac.uk dedicated email address or contact a safeguarding officer giving all relevant details. This is needed for WAES records. A referral can only be made to one of the designated Safeguarding Officers.

6.3 Safeguarding referrals are seen within 24 hours, or 48 hours if a referral is made on a Saturday.(Immediately for a young child)

6.4 It is not the staff's responsibility to investigate anything themselves. It is their responsibility to make the referral immediately to a Safeguarding Officer.

6.5 Managing a disclosure staff **must:**
- Listen carefully
- Record the conversation in the person's words (handwritten notes)
- Take note of the time, sign, and date the record
- Take all allegations or disclosures seriously (never judge) Reassure the individual that they are right to disclose
- Explain what will happen next. (a safeguarding referral is being made)
- Safeguarding Officer will attach/upload the notes taken and log them onto the Safeguarding tracker.

6.6 In managing a disclosure staff **must not:**

- Ignore any safeguarding allegation or disclosure Ask leading
  or prompting questions
- Make promises they are not able to keep in confidence Jump to
  anyimmediate conclusions
- Speculate or accuse anyone
- Discuss concerns with a parent, carer, guardian or family member in the first instance.
- Keep any allegations confidential (every safeguarding concern must be passed over to
  thesafeguarding team)

6.7 Following the disclosure and the referral, staff may be involved in a number of ways:

- They may have further concerns about the learner and refer additional concerns to the
  safeguarding team.

- Asked to provide additional information or be involved in an assessment or multi agency meeting;
  they may be asked to provide specific support as part of an agreed action plan.

- The WAES Safeguarding Designated Lead is the Principal and Head of Service. Concerns regarding
  members of staff should be referred to the Principal and Head of Service, or in her absence, the
  Head of Facilities.

- All other safeguarding concerns regarding learners or children can be dealt with by the
  Designated Safeguarding Officers on the published list.

- Literature about all the Safeguarding Officers can be found in all classrooms, every toilet block
  and on most notice boards across the service.

- The Principal and Head of Service will centrally retain records of all referrals made by
  SafeguardingOfficers.

7   Safeguarding Team

7.1 Designated Lead-Safeguarding Officer: Arinola Edeh – Principal and Head of Service

7.2 <u>Designated Safeguarding Officers</u>:

Alison Muggridge	Assistant Principal
Jaspal Dhaliwal	Head of Maths, English and LDD
Maysie Brown	LDD Co-ordinator
Annette Robson	Head of Learner Development (under 18 Lead)
Carol Glasgow	Childcare Manager (Child Protection Lead)

Lorraine Dean (WCC)

8   Preventing Extremism and Radicalisation

8.1   WAES recognises that safeguarding against radicalisation and preventing extremism is everyone'sresponsibility irrespective of the role they undertake or whether their role has direct contact orresponsibility for learners or not.

8.2   In line with the broader Safeguarding / Prevent legislation, any individuals identified as being in danger or at-risk of radicalisation or exposure to extremism must be reported to the WAES Safeguarding Team. At WAES the role of the Designated Safeguarding Lead includes the responsibilities of the Prevent Agenda strand of the Government's counter-terrorism strategy.

8.3   WAES has a standalone PREVENT Risk Register. This includes controls around

- **Online safety:** this supports the cross-service training that all staff have attended.
- Partnership work: collaboration around new partners, safeguarding partners and WCC Prevent Leads
- **Leadership:** understanding of the responsibilities under Prevent, Lockdown processes, Run Hide and Tell, regular meetings
- **Staff Training and awareness:** All staff regardless of their role are fully engaged in training
- **Speakers and Events:** Fully monitored and never left alone in any WAES centre
- Welfare and Pastoral: External agency support, support given to learners, monitoring learners
- **Prayer and Faith Facilities:** Signposting learners, issuing maps and promotions through posters
- **Work based learners including Apprenticeships, Traineeships and Employability Sector Based Work Academy Programmes**: Gives clarity and clear responsibilities under Prevent engagement with employers, Employer handbooks giving clear guidance on Prevent
- **Promoting British Values:** integrated with Teaching and Learning, specific notice boards, hate crime and wider promotions and support
- **Campus Security**: linked with both safeguarding and learner behaviour

9   Practice

9.1   WAES uses the following accepted Governmental definition of extremism which is:

9.2   *'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; and/or calls for the death of members of our armed forces, whether in this country or overseas'.*

9.3   As a Service we recognise that extremism and exposure to extremist materials and influencescan lead to poor outcomes for learners and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners, staff, carers and volunteers.

9.4   Any prejudice, discrimination, or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt with in line with our Learning and Behaviour Policy and the Unsatisfactory Performance Policy for staff, this will also include any Volunteers or Carers who are acting as a support for vulnerable learners.

10 As part of wider safeguarding responsibilities WAES staff will be alert to:

- Disclosures made by learners of their exposure to the extremist actions, views outside of the service, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or image
- Learners accessing extremist material online, including through social networkingsites
- Parental reports of changes in behaviour, friendship circles, or any actions or requests for wider assistance.
- Partner organisations, local authority services, and police reports of issues affecting learners inother settings.
- Learners voicing opinions drawn from extremist ideologies and narratives the use of extremist or 'hate' terms to exclude other individuals or incite violence against others.
- Intolerance of individual difference, whether secular or religious or, in line with our equalitiespolicy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views (to include any right-wing extremist views or practices)

10.1 Our Service will closely follow any locally agreed procedure as set out by Westminster City Council, the Safeguarding Children's Board, Adult Safeguarding Board and the Prevent Strategy'sagreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

10.2 Westminster City Council have a designated Prevent Lead, the lead gives direct support to the service and facilitates any direct referrals alongside the Metropolitan Police. The designated Prevent Lead will also support the service with any direct referrals through Channel to include involvement from the service at any Channel Panel.

11 Approach

11.1 All staff at WAES will strive to eradicate the myths and assumptions that can lead to people becoming alienated and disempowered, especially external influences or conflicts that challenge learner experiences and beliefs and may make it harder for them to further challenge or question these radical thoughts or influences.

11.2 We will ensure that all our support and approaches will help our learners build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills. We will develop strategies and staff training to ensure that our staff are equippedto recognise extremism and are skilled and confident enough to challenge it.

11.3 We will be flexible enough to adapt our teaching approaches, as appropriate and address specific issues to become even more relevant to the current issues of extremism and radicalisation.

11.4 Our goal is to build mutual respect and understanding and to promote the use of dialogue notviolence as a form of conflict resolution.

11.5 We will also work with local partner agencies, families, and communities in our efforts to ensure we understand and embrace our local context and values in challenging extremist views and to assist in the broadening of our learner's experiences and horizons. We will help support learners who may be vulnerable to such influences as part of our wider safeguarding responsibilities. In such instances we will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

11.6 At WAES we will promote the Fundamental British Values through the values of democracy, the

rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage learners to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our learners safe and prepare them for life in modern multi-cultural Britain and globally.

11.7 The Fundamental British Values are fully integrated in our Learning and Teaching Curriculum, Observation of Teaching Learning and Assessment Policy and promoted on classrooms walls andcentral notice boards across the service.

12 Use of External Agencies and Speakers

Our service will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the Service anddo not marginalise any communities, groups, or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or otherideologies
- Activities are matched to the needs of learners and the course
- Activities are carefully evaluated by services to ensure that they are effective andappropriate

We recognise, however, that our ethos is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.

Therefore, by delivering a broad and balanced curriculum, augmented using external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.

13 Whistle Blowing

When employees have concerns that the interests of others or the Service are at risk, the Westminster City Council Whistle Blowing Policy must be used. Details of this are available from the Human Resources team. HR would then refer onto to the LADO.

14 External Trips or Visits

Staff who are organising external trips or visits, should ensure a detailed risk assessment has been created and passed onto both Managers, Facilities Manager, and the Heads of Department,

15 Work based learners including Apprenticeships, Traineeships and Employability Sector Based Work Academy Programmes.

15.1 All WAES staff who are supporting learners on Work Based programmes will be DBS checked and will have received all training in relation to Safeguarding, Prevent, E-Safety etc.

15.2 Learners who are identified as vulnerable or 'at-risk' through Safeguarding will be supported remotely by a Safeguarding Officer. The support given will be through telephone or Microsoft Teams. In most cases this support is given through telephone correspondence.

15.3 Learners who are referred to external agencies, or any case referrals to agencies such as GP's, Adult Services, Children's Services, or 'Other' organisations will be facilitated through the Safeguarding

Lead.

15.4 Apprentice Learners

- Learners will communicate with their assessor regularly
- Pastoral related support given, and wellbeing discussed
- Changes in work produced is monitored
- Additional support needs identified
- Employer Handbook in place covering key areas of Prevent and support available to them
- All Employers receive a copy of this policy annually and relevant clarification from Safeguarding Leads
- Learners who disclose issues linked to bullying, social isolation (working in remote locations), struggling with mental health, abuse etc. will be referred to a safeguarding lead and communication made within 48 hours.
- Learners who have disclosed bullying or any form of abuse in the workplace, a full independent investigation will take place through Safeguarding Lead and Head of Department.
- Learners at-risk under Prevent will be referred to the local authority Prevent Lead and supported through Channel. WAES will attend remotely or in person depending on location and Local Authority agreement.

16 Associated Documents and Linked Policy and Procedures

Policies that work alongside the Safeguarding and Prevent Policy

- Safeguarding Policy for Guests and Visitors at Westminster Adult Education Service(summary document found at each reception location)
- E-safety policy
- Prevent Risk Register
- Death of a Learner Procedure (appendix 1 Safeguarding Policy)
- Prevent Risk Register
- Equality, Diversity, and Inclusion Policy
- DBS Policy
- Whistleblowing Policy
- Combined ICT Policy
- Admissions Policy
- Learning Support Policy
- WAES room hire, terms and Conditions Policy
- Learner Behaviour Policy
- GDPR Policy (WCC)
- Volunteers Policy
- Risk Assessment Documentation

17 Access to the Policy

This policy will be published on the WAES SharePoint Home site under "Documents...WAES Policies" and the WAES website.

18 Monitoring and Review

The Head of Learner Development will monitor and review this policy annually

Appendix 1

WESTMINSTER ADULT EDUCATION BEREAVEMENT PROCEDURE (PART OFWAES SAFEGUARDING)

Overview

During the current circumstances, it is sadly possible that the Service will experience the death of a learner. Moreover, a learner may suffer the bereavement of a family member or a very close friend. At WAES, we would normally have a strategy that would involve direct support given on site, through the safeguarding team and the Executive Board. However, under the current situation we must make every effort to support both our learners and staff and provide direct care to both learners and staff directly affected. This update clarifies how we respond to this tragic event should this occur during the period of WAES being in lockdown.

The key points of contact in this procedure are the **Principal** and **Assistant Principals** who will keep the Board of Governors updated and share information with the local community (if appropriate) in a timely way.

All staff are asked to ensure that any information received is passed on in a timely manner so that the appropriate support and actions can be put in place.

The Death of a Learner

WAES could be notified of the death of a learner in several ways, whoever is notified must ensure they forward all details onto the Principal and Assistant Principals immediately.

How could we be contacted

- Next of kin notifies the Tutor, or other member of staff directly
- A friend in the group is notified and contacts the Tutor
- The Principal is notified directly, from family member or friend
- The next of kin notifies WAES directly via information line or phone line

Information and Support for WAES Learners

1. Depending on how the notification is made, the tutor of learners in the affected classes may be contacted via the Principal or Assistant Principal. If the tutor is notified first, he/she must contact the Principal and Assistant Principals and seek immediate support, this will allow for the next step communications to occur. The learners in those classes affected will be contacted as soon as possible by telephone and email. This will be done through the Assistant Principals and Head of Learner Development. The communications will include links to the support available to them. ***See Appendix 1*** (if the notification is via the information line or phone line, the Learner Experience Officer will pass this information onto the Principal immediately)

2. The Principal will formally write to the learner's family to express sympathy on behalf WAES and theBoard of Governors.

3. Following support and guidance from the Principal and Assistant Principals, Heads of Department, Coordinators, and the tutors of classes that are affected will reinforce and advise WAES learners the support available to individuals.

4. Tutors should be aware that some learners may feel they cannot attend their remote lessons, and there may be the need for flexibility regarding course work completion or submission or assessments. Head of Department and Coordinators will need to support as required. People react to grief in many ways, including some that are not always obvious. This will be very difficult to spot remotely, but tutors will be asked to remain alert to any presenting indicators that show individual learners are not coping. Learners often gain the support they need from theirsocial groups and families; adult learners may not have support they can draw upon. The Safeguarding team

can sign post learners to external support and act as a listening ear through this challenging time. If the Learners is a Westminster Resident, WCC have local support we could refer learners to.

5. Administration and e-learning will make available a virtual book of remembrance, this will be an opportunity for learners and staff can express their condolences. This will be implemented if the Principal and Assistant Principals think that it is appropriate.

6. Tutors and the Safeguarding team must stay alert to any learners affected by bereavement. The Head of Department will ensure that learners progress is monitored carefully over time and appropriate support is offered, implemented, and reviewed. If a learner suffers the loss of a family member, they may decide to take a gap from learning, this must be respected. Support can still be given and offered as following a window of time, the learner may decide to return to learning as a support to assist them moving on.

Information and Support for Staff

- The Principal or Assistant Principals in the event of a learner's bereavement will communicate with all staff that are impacted. Staff must ensure that all communications regarding the learner's bereavement are consistent and adheres to the message sent to the family (as appropriate) by the Principal. This is to prevent potentially inaccurate communication from spreading.

- The Principal will inform the Chair of the Governors and all members of the WAES governing body.

- The Principal will also inform any relevant external partners.

- In the event that the media are involved in reporting on the learner's bereavement, the Principal and Assistant Principal for Business Support will consult with WCC regarding the official statement on behalf of the WAES. Staff should never communicate directly with the media or discuss the student bereavement through social media.

- The Assistant Principal for Business Support will liaise directly with MIS and ensure that relevant College records are amended.

Staff Member Suffering a Family Bereavement
- **Please refer to the WCC policy and HR**

Death of a Staff Member
- **Please refer to the WCC policy and HR**

It is important that all next of kin details staff are fully up to date on SAP

Safeguarding Team April 2020

Appendix 1 External Support and Counselling support links

BEREAVEMENT COUNSELLING

Experiencing the loss of a loved one is painful, and for those who find support in friends and family members, bereavement is made worse in self-isolation.

Cruse Bereavement Care's helpline is open as usual on 0808 808 1677, so please do give them a call if you need someone to talk to.

NHS BEREAVEMENT SUPPORT

https://www.nhs.uk/conditions/stress-anxiety-depression/coping-with-bereavement/

SAMARITANS

Every life lost to suicide is a tragedy | Here to listen
www.samaritans.org

Telephone Number: 116 123 (this is a free 24/7 number)
Samaritans works to make sure there's always someone there for anyone who needs someone

Appendix 2 Code

of Practice

The following code of practice applies to all Service staff and learners working with children, young people or vulnerable adults, whether acting in a paid or unpaid capacity:

Avoid unnecessary physical contact.
- Do not take a child, learner, young person or vulnerable adult alone in a vehicle onjourneys, however short.
- Unless circumstances make it impossible to comply, do not take a child or vulnerable adult to the toilet unless either (a) another adult is present or (b) another adult is aware(this may include a parent, carer or group leader).
- If you find you are in a situation where you are alone with a child, learner young person or vulnerable adult, wherever practicable make sure that others can clearly observe you. Locate yourself near to an open door or glass panel and make yourself visible.
- Do not have close personal relationships with a child, learner, young person or vulnerable adult in relation to whom you are in a position of trust.
- Never make suggestive or inappropriate remarks to or about a child, learner, young personor vulnerable adult.
- If a child, learner, young person or vulnerable adult accuses a learner or member of staff ofabuse or inappropriate behaviour, you should document down the allegation and report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusations of historic, and not justrecent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusation from a child, learner, young personor vulnerable adult, it is important to listen without making or implying any judgement as to the truth of the complaint or accusation.
- If a child, learner, young person or vulnerable adult makes a complaint, disclosure or if there are other reasons for suspecting abuse, you should not attempt to investigate this yourself, but should report your concerns to the designated safeguarding officer appointed under the Service's policy on the Safeguarding and Prevention of Radicalisation Policy.
- Participate in all training or update training available to you to support you in your workwith learners, children, young people and vulnerable adults.
- Remember that those who abuse children, young people and vulnerable adults can be of any age (even other children and vulnerable adults), gender, ethnic background or class, andit is important not to allow personal preconceptions about people to prevent appropriate action from taking place.
- Good practice includes valuing and respecting children, learners, young people and vulnerable adults as individuals, and the adult modelling of appropriate conduct – which would exclude bullying, aggressive behaviour and discrimination in any form.
- Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in the policy. Any information received should be acted upon sensitively, effectively and efficiently. Wherever possible, those making allegations should be given information about the outcome.
- Although allegations should be reported only on a "need to know" basis, staff and learners making allegations need not be concerned that they will be breaching confidentiality or the Data Protection Act (GDPR), as complying with the policy overrides such obligations. If the person making the allegation feels they need counselling or other appropriate support from the Service, they are encouraged to seek it.
- Ensure that you comply with appropriate licensing laws.

Appendix 3

16 to 19 Age Group Learners

A learner centred and coordinated approach to safeguarding

At WAES Safeguarding and promoting the welfare of children is everyone's responsibility. All staff who encounters children and their families has a role to play. To fulfil this responsibility effectively, all teaching practitioners should make sure their approach is learner centred. This means that they should consider, always, what is in the best interests of the learner.

No single staff member can have a full picture of a child's needs or young person's needs and circumstances. If learners and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action.

Under 19 Recruitment

WAES enrols a small number of learners who are on study programmes. Each learner is interviewed with their parent, carer or appropriate adult prior to the enrolment occurring. WAES is an adult learning environment it is therefore important to ensure that we can provide the appropriate support for the young person. The learners that have been recruited could be classified as vulnerable as they may have been either bullied at school, home tutored or have attended special educational settings in the past. WAES settings are smaller than is typical of a general further education college, therefore in certain circumstances, it is a safer environment for some learners who are under 19.

Staff teaching or supporting learners who are under 19 have DBS checks completed through HR.

Learner Reviews

All learners who are under 18 and on study programmes, has a review of achievement every six weeks, alongside the teaching team and ALS. Any poor learner behaviour is monitored, if concerns linked with changes in behaviour or nonattendance at WAES is reported directly to a safeguarding officer. Each review monitors progress and assesses if increased support structures are required.

Staff who support any learner who is under 19, immediately refer any concerns to the safeguarding team. This policy and procedure comply with all updated legislation related to learners who are both under 19 and over 19

Appendix 4

Safeguarding Glossary of Legislation:

Keeping Children Safe in Education 2021 (KCSIE)

Statutory guidance for schools and colleges to follow, this legislation forms the basis for keeping children safe in education. This is government legislation and forms the basis for safeguarding in all educational environments.

Working Together to Safeguard Children 2018

Statutory guidance on inter-agency *working* to *safeguard* and promote the welfare of *children*. This statutory framework sets out the legislation relevant to *safeguarding* and it should be read alongside the statutory guidance.

Safeguarding Vulnerable Groups Act (SVGA) 2006

This Act provides the legislative framework for a new vetting and barring scheme for people who work with children and vulnerable adults

The new Ofsted Education Inspection Framework 2021

This framework sets out Ofsted's inspection principles and the main judgements that inspectors make when inspecting colleges. This legislation is the basis of any college inspection.

Safeguarding Partners (new 2019)

Under the **new** legislation, the **three safeguarding partners** (local authorities, chief officers of police, and clinical commissioning groups) must make **arrangements** to work together with relevant agencies (as they consider appropriate) to **safeguard** and protect the welfare of children in the area

The **three safeguarding partners** should agree on ways to co-ordinate their **safeguarding** services; act as a strategic leadership group in supporting and engaging others; and implement local and national learning including from serious child **safeguarding** incidents.

A *safeguarding partner* in relation to a local authority area in England is defined under the Children Act 2004 as: (a) the local authority, (b) a clinical commissioning group for an area any part of which falls within the local authority area, and (c) the chief officer of police for an area any part of whichfalls within the local authority area. The three safeguarding partners should agree on ways to co- ordinate their safeguarding services; act as a strategic leadership group in supporting and engagingothers; and implement local and national learning including from serious child safeguarding incidents. To fulfil this role, the three safeguarding partners must set out how they will work together and with any relevant agencies as well as arrangements for conducting local reviews.

(Definition provided by Working Together)

Safeguarding Glossary of Terminology:

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. (NICCO provides information designed to support professionals working with offenders and their children).

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

County lines
Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

Child Protection
An emergency protection order is an order from the court that allows the child to be removed from home if the child is in imminent danger and grants parental responsibility to the local authority.
.
Child Criminal Exploitation (CCE)
Guidance on how children can be exploited and makes clear that the experiences of girls being criminally exploited can be very different to boys, indicators of CCE may also be different for girls

Domestic abuse
The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

Homelessness (under 18)
The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus

to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Honour-Based' Violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Female Genital Mutilation (FGM)
FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Forced marriage
Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.
Threats can be physical or emotional and psychological. A lack of full and free consent can be wherea person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Prevent duty
All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach

Extremism
Is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

Channel
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. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Up skirting

'Up skirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is now a criminal offence

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Sexual violence and sexual harassment

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 This act includes: rape, assault by penetration, sexual assault, sexual harassment and detailed information regarding consent.

E Safety

1. Purpose

WAES has a duty of care to safeguard all learners, staff, visitors, and stakeholders. It is committed to providing a totally safe and secure learning environment for both learning and work. WAES recognises the benefits and opportunities, which new technologies offer to teaching and learning. Our approach is to implement safeguards within the Service, and to support staff and learners to identify and manage risks. We believe this can be achieved through a combination of security measures, training and guidance and implementation of our associated policies.

This e-safety policy should be read in conjunction with other relevant Service policies Procedures such as Safeguarding and Prevention of Radicalisation Policy, IT User Policy, Learner Behaviour Policy and the Equality and Diversity Policy.

WAES will ensure that key Safeguarding principles are adhered and monitored, ensuring that all 'on line working practices' to include the increased 'on-line workings' brought about through COVID-19, are placed at the centre of teaching, learning and safeguarding.

2. Scope

The policy applies to all WAES Staff and Learners who have access to the Service IT systems, both on WAES premises and through remote access.
Any user of Service IT systems must adhere to e-Safety Rules, regulations, and the IT Use Policy. The e-Safety Policy applies to all use of the internet, and electronic communication devices such as outlook email, mobile phones, laptops, PCs, iPads, games consoles, social networking sites, and any other systems that uses the internet for connectivity purposes or through the providing of information

3. Objectives

The objectives of the policy are to:
3.1 To ensure safeguards on Service IT-based systems are strong, reliable and reportable
3.2 To ensure user behaviour is safe and appropriate
3.3 To assure that the storage and use of images and personal information on WAES Service IT based systems is secure and meets all legal requirements
3.4 To ensure that learners on Distance Learning courses, Apprenticeship courses are Inducted and supported through their Personal Tutor, Assessor or Employer (Apprenticeship programmes)
3.5 To ensure that WAES educate Staff and learners in e-safety
3.6 To ensure any incidents, which threaten e-safety, are managed appropriately
3.7 To ensure that any malpractice is addressed, and person or persons are disciplined or educated appropriately
3.8 To ensure that WAES IT services communicates with Safeguarding to mitigate and educate Staff and Learners

4. Definition of E-Safety

The term e-safety is defined for the purposes of this policy as the process of limiting and mitigating the risks to all WAES learners. This policy acknowledges learners who have EHCPs or are Under 19, young people and vulnerable Adults when using the Internet, Digital and Mobile Devises, Technologies (IDMTs) through a combined approach.

By implementing policies and procedures and creating an infrastructure through education awareness and training, underpinned by standards and inspection.

E-safety risks can be summarised under the following headings.

4.1 Content

• Exposure to age-inappropriate materials
• Exposure to chatrooms or sites linked to grooming
• Exposure to inaccurate or misleading information
• Exposure to socially unacceptable material, such as inciting violence or hate crime
• Exposure to extremism or radical views (radicalisation)
• Exposure to communication with organisations linked with County Lines
• Exposure to right-wing views or intolerance to other views
• Exposure to illegal material, such as images of child abuse
• Illegal Downloading of copyrighted materials e.g., music and films or books

4.2   Contact

• Grooming using communication technologies, potentially leading to sexual assault or child prostitution, sexual exploitation or inappropriate sharing of photographs or videos
• Radicalisation the process by which a person comes to support terrorism and extremist ideologies
associated with terrorist groups (Prevent Agenda)
• Extremist views and ideologies associated with Right Wing extremist views
• Child Sexual Exploitation(CSE)
• Bullying via websites, mobile phones, tablets or other forms of communication device
• Youth Produced Sexual Imagery (YPSI–formerly known as 'Sexting')

4.3   Contact and Educate (the three Cs)

• Content: being exposed to illegal, inappropriate or harmful material
• Contact: being subjected to harmful online interaction with other users
• Conduct: personal online behaviour that increases the likelihood of, or causes ,harm

4.4   Commerce

• Exposure of minors (under 16) to inappropriate commercial advertising
• Exposure of Vulnerable Adults to commercial advertising (EHCP or LDD learners)
• Exposure to online gambling sites
• Exposure to on-line chat rooms sites
• Exposure to commercial and financial scams

4.5   Conduct

• Personal online behaviours that increase the likelihood and risk of, or has the potential to causes harm to individuals
• Conscious online behaviour that entices and indoctrinates another person or persons to commit a crime
• Conduct both internally at any WAES centres and on-line using a WAES device

5. Responsibilities

• The Head of IT and Safeguarding Lead are responsible for maintaining this policy, and for monitoring best practice in IT procedures and practices to manage any e-safety risks effectively.
• The following persons are responsible for implementing it at WAES:
• The Head of Resources for all e-safety matters in relation to WAES Staff.
• Safeguarding Leads for all e-safety matters in relation to support for Learners.
• The Head of IT for championing good e-safety practice in Service IT facilities and processes, and for
providing any technical expertise when issues are under investigation.
• Head of Learner Development to ensure e-safety is incorporated into the WAES Learner Induction, supporting tutors with e-safety, and for providing an appropriate range of resources to tutors to access.
• Personal tutors for good e-safety practice for Distance Learning learners
• Issues raised by WAES apprenticeship learner or employer will be resolved through Assessor or Apprenticeships & Employability Co-ordinator
• All WAES Heads, Co-ordinators and tutors for embedding e-safety education and practice into their teaching and learning programme.
• All WAES Managers (SMT) for implementing good e-safety practice and safeguards consistent with this policy in their area of responsibility.
• The Service Safeguarding Committee for overseeing and reviewing e-safety arrangements.
• All members of Service staff for staying alert to and responding appropriately to any potential or actual e-safety issue.

6. Outcomes

6.1 IT Security
The Service networks are safe and secure, with relevant, appropriate, and up-to-date security measures and software in place.
WAES uses 'Smoothwall' system as our firewall E-Safety protection. Smoothwall protects us from "outside world threats", separates different segments of our internal network and provides a filtering system to our Internet traffic.
All websites accessed from inside the college are compared with the list of "harmful websites" and the access is either granted or denied depending on the result.
A list is provided by Smoothwall and regularly updates WAES of issues or concerns.
In addition, WAES uses Sophos, which is another layer of internal protection that will detect potential viruses. Also, it hunts down any threats detected as active and adversaries on potential issues or concerns.

6.2 Risk assessment and training

When making use of new technologies and online platforms, IT staff and Teaching Staff must assess the potential risks that they and their learners could be exposed to

During COVID-19 and beyond staff and learners received training on how to use Microsoft Teams and appropriately share the screen and communicate. This is also reinforced through the WAES Learner Induction, available to all learners including, Distance Learning, Apprenticeship, Community Learners, and learners on short courses.

6.3 Behaviour and Responsibilities

• It is an unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to radicalisation, violent extremism or terrorism or which is intended to anger, update or annoy, harass or intimidate another person. This also applies to use of social media systems accessed from WAES IT Service systems.
• All users of information technology will adhere to the standards of behaviour set out in the IT User Policy.
• All users of IT adhere to WAES Service guidelines when using outlook email, mobile phones, iPads, Laptops, social networking sites, games consoles, chat rooms, video conferencing and web cameras, Microsoft Teams, Zoom, Skype etc.
• Any inappropriate use or abuse of IT systems will be reported to the Head of IT and Executive Board
• Any issues of bullying or harassment (cyber bullying) will be dealt with seriously, in line with staff and Learner behaviour and disciplinary procedures.
• Any conduct considered illegal will be reported to the police.
• Staff must receive consent for recording on-line lessons or taking photographs (enrichment activity or teaching)
• Staff must take responsibility for moderating and any content that is posted online.
• Staff should be aware of cyber bullying, grooming law and child protection issues and forward any concerns to a Safeguarding Lead.
• Staff must keep their personal and professional lives separate online.
• Staff must not have learners as 'friends' on social media sites that share personal information. (Facebook, WhatsApp, Personal Email, Personal Phone Number)
• Staff must not divulge their personal details online, staff are also advised to investigate and acknowledge privacy settings on sites to control what information is publicly accessible.
• Staff should recognise that they are legally liable for anything they post online.
• Staff should maintain professional ethics and code of conduct in line with safeguarding.
• Staff are expected to adhere to the Service's equality, diversity and inclusivity policy always and not post derogatory, offensive or prejudiced comments online. This applies to internal and external staff communications.
• Staff should not harass, intimidate, bully or abuse work colleagues/learners online. Staff should think about what is being written and the tone and impact poor communications could cause. (if in doubt, check with a Manager)
• Staff entering a debate with a student online should ensure that their comments reflect a professional approach. Progression Targets given should be constructive, communication etiquette must professional. (once an email has been sent it cannot be retrieved)
• Staff should not post any comments online that may bring the Service into serious disrepute or that may damage the Service's reputation with partner organisations, Parents, Carers, Guardians, Learners or prospective learners. Strong customer service values must be adhered to.
• Staff who wish to debate or pass comment on professional issues through personal on-line sites, must be aware that this may reflect the Service's views, even with a disclaimer, and must consider their postings extremely carefully.
• Staff should not use their Service Outlook e-mail address to join sites for any personal reason or make their Service e-mail address their primary contact method.
• Staff need to be aware that any reports of them undertaking inappropriate online activity through their WAES profile and links them to the Service will be investigated through HR and could result in disciplinary action taking place.

6.4 Use of images and video

• The use of images or photographs is always encouraged in teaching and learning. Consent must be taken, and staff must ensure there is no breach of any copyright or other rights of another person.
• Staff and learners must be trained regarding the risks in downloading, posting or sharing images, and particularly in the risks involved in posting personal images onto social networking sites, In all cases consent to share images must be received.
• WAES staff must provide information to all learners on the appropriate use of images, and on how to keep their personal information safe.
• Managers of Vulnerable Learners (EHCP and LDD) must give training to learners on how to safely use IT devises and how to keep themselves safe on-line.
• Advice, guidance and approval from the Head of IT or IT Support Officers if there is any doubt about the publication or concern linked to posting or downloading materials.

6.5 Personal information

• Processing of personal information is done in compliance with the GDPR and Data Protection Act 2018 the 8 principals of Data Protection must be adhered to.

The Eight Principles of Data Protection
1. Fair and lawful
2. Specific for its purpose
3. Be adequate and only for what is needed
4. Accurate and up to date
5. Not kept longer than needed
6. Consider people's rights
7. Kept safe and secure
8. Not be transferred outside the EEA

• All information is kept safe and secure and is not passed on to anyone else without the express permission of the individual. (HR and MIS)
• No personal information is posted to the Service website/intranets without the permission of a senior manager.
• Staff must always store and maintain learners' personal information safe and secure. If in doubt, contact Head of MIS and Exams for support.
• All storage of Staff and Learner information must comply with GDPR regulations.
• When using any online platform, all personal information is password protected.
• No personal information about any individual is taken offsite unless the member of staff has the permission of their manager or GDPR lead. All information must be stored centrally and used in conjunction with WAES procedures.
• Every user of any IT facilities must log off on completion of any activity, or ensure the room is locked if unsupervised, when they are physically absent from a device.
• Every user must lock their PC when not in use.
• Staff who have a WAES mobile devices must keep the devise safe when not in use. All sensitive information must be encrypted, and password protected.
• Any personal data no longer required, is securely deleted. Receive support from Head of IT or Head or MIS and Exams if needed.

6.6 Education and Training

• Staff and learners are supported through training and education to develop the skills to be able to identify risks independently and manage them effectively.
• The WAES Learner inductions contains a combination of e-safety support. This can be found in the sections WAES to be Safe and WAES to be Digital.
• Learners are guided and supported in e-safety across the curriculum and opportunities are taken to reinforce e-safety messages throughout teaching and learning.
• Learners know what to do and who to talk to where they have concerns about inappropriate

content.
• Learners understand the support available to them when searching the internet, or where inappropriate websites are discovered as part of a random search.
• In lessons, learners are encouraged to question the validity and reliability of materials researched, viewed or downloaded. They are encouraged to respect the copyright of other parties and to cite the references properly.
• All new WAES staff or temporary users receive training on the use of IT and Safeguarding and eSafety. Staff are also asked to read the IT User Policy.

7 Incidents and response

• A clear and effective IT incident reporting procedure is maintained and communicated to learners and staff. Any updates are circulated to all staff in the form of a bulletin or part of the weekly e news.
• Reports of any e-safety incidents are acted upon immediately to prevent, as far as reasonably practically possible, any harm or further harm occurring.
• Action following the report of an e-safety incident might include disciplinary action, direct reports to external agencies, parents or carer updates for EHCP learners or Vulnerable Adults (e.g., the Police or Channel Panel). A review of internal procedures and safeguarding protocol and increased staff support for the affected learners. This could be tutor or safeguarding leads.

8. Associated Documentation/Linked Policies/Procedures

• Racial & Religious Hatred Act 2006
• Sexual Offences Act 2003
• Police & Justice Act 2006
• Computer Misuse Act 1990 (s1-3)
• Communications Act 2003 (s127)
• Data Protection Act 2018 (GDPR)
• Malicious Communications Act 2003 (s1)
• Copyright, Design & Patents Act 1988
• Public Order Act 1986 (s17-29)
• Protection of Children Act 1978 (s1)
• Obscene Publications Act 1959 & 1964
• Protection from Harassment Act 1997
• Regulatory of Investigatory Powers Act 2000
• Child Protection Act 2003
• Prevent Duty Guidance: for Further Education institutes in England and Wales 2015

9.Access to the Policy

• The policy will be published on the SharePoint under 'Safeguarding'.
• This policy will be published on the WAES Induction under WAES to be Safe (safeguarding)

10. Monitoring and Review

WAES Safeguarding Committee is made up of Principal, Assistant Principal, Head of Learner Development, Head of Inclusion, Maths, English and LDD, Nursery Manager, LDD Co-ordinator and a WAES Governor.
This Policy was given full approval through the Safeguarding Committee, Head of IT and SMT
The impact of the policy will be monitored regularly with a full review being carried out every year. The policy will also be reviewed where concerns are raised by the Safeguarding Manager, or where an e safety incident has been recorded.

Appendix 1

Key Terminology
Child Sexual Exploitation (CSE) may involve utilising the Internet and Social Media to identify potential victims or as a tool to coerce and blackmail children into performing sexual acts, both on and offline.
Youth Produced Sexual Imagery(YPSI)–formerly known as 'Sexting')can be defined as 'an increasingly common activity among children and young people, where they share inappropriate or explicit images online'. This can include sharing indecent images of themselves or others via mobile phones, webcams, social media and instant messaging.
Cyber Bullying. All staff should be aware safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but not limited to: bullying (including cyberbullying), gender-based violence/sexual assaults and YPSI. Staff should be clear as to the school or college's policy and procedures with regards to peer-on-peer abuse."

Appendix 2

Key Factors and information for Education Settings (DfE) important for Under 19 learners and learners classed as vulnerable (WAES LDD and EHCP Learners)
Section35. All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
Section36. Abuse: 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 or In an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or by another child or children (peer on peer abuse).
Section 38. Emotional abuse: the persistent emotional maltreatment of a child such as to cause Severe and adverse effects on the child's emotional development […] It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying

Appendix 3

e-Safety Reporting Procedure

Concern about a Learner

1. Seek advice from a Safeguarding Lead
2. If this a Child Protection Safeguarding Lead will seek clarity from Designated Safeguarding Lead (DSL) the safeguarding lead may refer to external organisations (Police or Social Service or External Agencies)
3. If the concern is against the law the Police may be contacted
4. If it is dealt with internally an investigation will be carried out.
5. Depending on the concern disciplinary action may be taken
6. All Policies and Procedures will be followed
7. Appropriate paperwork will be completed
8. Learner placed on the Safeguarding or Risk Register
9. Learner monitored and supported

Concern about a Staff Member

1. Report to Head of HR
2. Head of HR will liaise the Executive Board and Head of Department
3. Investigation will be carried out
4. Depending on the concern disciplinary action may be taken
5. If the concern is against the law the Police may be contacted
6. All Policies and Procedures will be followed
7. Appropriate paperwork will be completed

Equality Impact Assessment / Safeguarding Considerations

Westminster Adult Education Service is committed to the promotion of equality, diversity and providing a supportive environment for all members of our community. Our commitment means that this policy has been reviewed to ensure that it does not discriminate (either intentionally or unintentionally) any of the protected characteristics of age, disability, gender (including gender identity), race, religion or sexual orientation and meets our obligations under the Equality Act 2010.

Name of Policy/Procedure	Compliments & Complaints Policy & Procedure
1 If **Equality Impact Analysis** is not relevant to this function, give reasons and proceed to section 5.	
2 In what ways could this function have a negative impact on any of the groups above? What actions have been taken to eliminate these?	There could be resource limitations in helping learners to follow all the requirements of this procedure. We would explore all the options available to us in order to support all users in their understanding and application of the procedure and make reasonable adjustments to the procedure if required, for instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations
3 In what ways could this function have a positive impact on any of the groups above? How will this function be used to eliminate discrimination, advance equality of opportunity and foster good relations between different groups? Are there plans that will further advance equality?	This policy aims to be an open access and all-inclusive process. The annual review of Safeguarding will look to identify updated legislation and controls in place at WAES
4 What evidence supports your judgement eg. Observations, Consultations, expert opinions, quantitative or qualitative surveys. If the evidence is in the form of additional documentation where is this stored?	Comprehensive and up to date Safeguarding Records

5 Has this function taken into account and cross-referenced where appropriate to **Safeguarding** policy and procedures? Give Details.	GDPR regulations have been considered and actions comply with data protection requirements.

POLICY OWNER Signed: Date:	Annette Elizabeth Robson 02.11.2021

Version Control Information

Version	Date	Revision Author	Summary of Changes
1	October 2021	Annette Elizabeth Robson	New Format

| 2 | November 2021 | Annette Elizabeth Robson | Updated KCSIE legislation September 2021 |