


**WESTMINSTER ADULT EDUCATION SERVICE**

**SAFEGUARDING & PREVENTION OF RADICALISATION POLICY**

**Ref No: LE4**

**Version: 4**

<b>Owner:</b>	Head of Learner Development	<b>Approved by:</b>	Signature on behalf of Executive Board   Arinola Edeh	<b>Date of Approval:</b>	04/09/23
<b>Effective from Date:</b>	04/09/23	<b>Effective to Date:</b>	31/07/24	<b>Next Review Date:</b>	04/06/24

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 (KCSE) 2023', 'Working Together to Safeguard Children 2022', 'Safeguarding Vulnerable Groups Act 2006' and the new Ofsted Education Framework 2023, are legislations that have supported this policy.

*(See Appendix 4 for glossary 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.

This policy also accepts and understands the principals and practices as laid out in the Equality Act 2010.

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

### **1.1. Scope**

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 used a whole College approach to safeguarding young people and vulnerable adults.

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 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 of themselves.

It also applies to any learner who may be unable to protect themselves against significant harm or exploitation) whom the Service encounters through its

teaching and learning activities as well as through 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 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 support 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 other learners, teaching staff, support staff and volunteers (whether acting in a paid or unpaid capacity through volunteering).

This policy alongside Equality and Diversity will following the Equality Act 2010 and the Human Rights Act 1998 and will take positive steps to prevent any form of discrimination. We will also adhere to Keeping Children Safe in Education, legislation (2023 update) we 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 (Disability and Inclusion) learners or learners with a specific 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 who are classified as vulnerable.
- Learners who are ex-offenders.
- Learners who have numerous criminal convictions.
- Learners with specific 'Mental Health Conditions' and or may be supported through NHS support workers either in hospitals or through 24/7 supported accommodation.
- Learners who are homeless, sofa surfing or living in hostels.
- Learners of different religions and beliefs.

**Learners who are aged 16 – 19 – See appendix 3**

- Any allegation of child-on-child 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.
- Causing a child to marry before their eighteenth birthday 'Unofficial or through a Forced Marriage' (legislation Feb 2023)
- Any safeguarding disclosure will trigger children services.
- Learners who have disclosed any form of bullying will be investigated and recorded.
- Learners who are showing signs of being drawn in to anti-social or criminal behaviour, 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 who may be suffering from abuse or neglect sexual violence or sexual harassment.
- A learner at-risk through Female Genital Mutilation (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 at risk of being radicalised or exploited (PREVENT)
- A learner who is in a family circumstance that is presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse.
  - A learner who is misusing drugs or alcohol themselves
- A learner who has returned home to their family from the care system.
- A learner who is a privately fostered child.
- A learner who has disclosed being drawn into County Lines

## **2. Aims and Objectives**

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 bring into contact whilst recognising that it cannot act "in loco parentis". Ultimate responsibility will continue to rest with parents, carer or guardian. If a learner is under the care of the local authority, steps will be taken to involve Social Services, Adult Services, or external support agencies.

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 aim to facilitate the management of the risk associated with the duty to protect such individuals.

The aim of this policy is to highlight the **key** areas that form the basis of **WAES** approach to safeguarding and 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 Safeguarding Risk Assessments
2. Ensuring all Recruitment, Selection and Employment procedures are in place through our safer recruitment process and designated recruitment training in place
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 attracted to WAES.
5. Ensuring the prevention of radicalisation is embedded into WAES curriculum and staff are aware of the signs of radicalisation.
6. Make it clear that safeguarding child protection policies should also include procedures for dealing with child-on-child abuse.
7. Make it clear that any adult who has made a disclosure of peer-on-peer abuse (bullying), safeguarding procedures will be in place and support for learners re-enforced through staff training.
8. Ensure we have a standalone e-safety policy and procedures.
9. WAES has a robust firewall that prevents cyber-attacks. The firewall also makes scanning from hackers much harder.
10. WAES firewall firmware will be kept up to date, any person who triggers the firewall will be reported to Safeguarding.
11. Ensure training is in place and staff and learners are consistently updated, to include Safer Recruitment and Selection process, safeguarding to include e-safety, child on child abuse, peer on peer abuse, healthy relationships, e-safety and prevent.

### **3. Responsibilities**

Safeguarding is everyone's responsibility, at WAES. Executive Board, Safeguarding Leads and managers have the responsibility to ensure that this policy is understood and followed by staff.

Head of IT is responsible for delivering and maintaining effective filtering and monitoring systems, providing a safe environment for learners and staff to learn and work and both online and offline.

The Executive Board, Designated Safeguarding Lead and Lead Governor have strategic responsibility for ensuring the filtering and monitoring standards are met across all WAES centres.

### **3.1. WAES Safeguarding Officers will support.**

- Parents or carers with young children at risk of harm (WAES nurseries)
- Any learner who are being supported by the local authority under a section 42 enquiry.
- We will put in place any additional safeguarding process to support the vulnerabilities of any learner with Special Educational Needs and Disabilities Code of Practice (SEND).
- Any learner or group or individuals presenting violent or extremist ideologies.
- Individuals in abusive or acting inappropriately unhealthy relationships.
- Learners at-risk through any forms of abuse or neglect. This could include physical abuse, emotional abuse, sexual abuse or exploitation and abuse through neglect or coercive control.
- Learners at-risk through any form grooming (in person, online, or by phone, etc.)
- Learners suffering any form of bullying, child on child or peer on peer (adult) to include on-line bullying.
- Individuals who are self-harming or are classified as at-risk to self or others (mental health)
- Individuals who have disclosed being a victim of up skirting.
- Learners suffering from any form of substance misuse.
- Individuals who may have committed a crime.
- Learners at-risk through any forms of exploitation including sexual, financial, and criminal exploitation.
- Individuals who are at-risk through the Home Office or immigration related issues.
- Individuals who may be experiencing homelessness or are seeking refuge.
- Learners who are suffering from any form of victimisation and prejudice due to race, gender, sexuality, faith and belief or disability.
- Any learner concerns linked to eating disorders.
- Learners suffering from honour-based violence which will also include female genital mutilation (FGM)
- Learners who are at-risk to forced marriage.
- Sexual violence and sexual harassment between any learner
- Learners who are being criminal exploitation through county lines
- Learners under 18 at-risk of homelessness
- Learners at-risk through section 2 or 3 of the Mental Health act. (Up to 28 days under Section 2 of the Mental Health Act. up to 6 months under Section 3 of the Mental Health Act
- The prevention of radicalisation (PREVENT)

### **3.2. Safeguarding Leads**

- Will always take any Safeguarding allegation seriously.
- Will ensure that all victims are 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.
- Will update the safeguarding policies annually and ensure that staff training covers annual updates.
- Any low-level concerns or poor behaviour will be monitored and addressed as per learner behaviour and e-safety policy.
- When dealing with any allegation, Safeguarding Officers will collaborate with external organisations, such as the local authority or relevant external agencies.
- 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 as required.

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

***Anything that causes WAES to become concerned about a member of staff or volunteer would involve HR and could trigger partner arrangements to be put in place as relevant.***

### **3.3. IT Lead (Head)**

The Head of IT will manage the WAES firewall and have responsibility with understanding the implementation, all upgrades and overall management of the system effectively, across all WAES centres.

The Head of IT will ensure that the firewall is monitored and updated regularly.

The Head of IT will know how and when to escalate concerns when identified to Safeguarding Lead. In most cases the firewall will trigger any log-in related to Prevent, sexual exploitation, hate crimes or pornography.

All staff concerns will be reported to Designated Safeguarding Lead.

### **3.4. 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 that are more resilient to extremism and protecting the well-being of learners or groups

who may be vulnerable from 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'.

- 3.5.** WAES is equally committed to creating a safe and welcoming learning environment for everyone. 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.
- 3.6.** WAES has dedicated 'Mental Health First Aiders' 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, trauma, neglect or exploitation. Where appropriate referrals are made to external support organisations or in some cases support is being received through the NHS mental health team.
- 3.7.** WAES will not allow the use of any IT equipment in the learning centres for any person who are not enrolled, after a one-month period of a course finishing. Extended periods will be negotiated through the Course Leader if a re-take exam or revision time in WAES is needed. (A one-month period allows for completion of work or re-take submissions)
- 3.8.** 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.
- 3.9.** A manager or Tutor will always accompany any visitor or guest speaker, who is invited into the service.
- 3.10.** We understand that any information or 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.

- 3.11.** 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 or vulnerable adults should ensure that they fully understand the implications of this policy before writing 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 that includes 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
- Increased controls needed to verify a person's career history and identify any obvious gaps, to check for any criminal convictions that have not been openly disclosed.
  - CV's will not be accepted; a full application form is required for any WAES role.
  - Online searches will be made by HR on each application as part of the due diligence checks on all shortlisted candidates.
- 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 Safer Recruitment policy.

- 4.2.3.** The Service is registered through Westminster City Council with the Disclosure and Barring Service (DBS) and will ensure that all staff or any learner who will have substantial contact with children, young people or vulnerable adults will be checked for relevant criminal convictions.
- 4.2.4.** The Service has a duty to comply with the Safeguarding Vulnerable Groups Act 2006 and 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. 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 the conviction.
- 4.2.5.** All learners will be asked about any criminal convictions they hold during the recruitment and welfare process. If required a 'risk assessment' may be created, alongside regular monitoring checks put in place. The Designated Safeguarding Lead has the right to refuse an applicant based on a criminal conviction.
- 4.2.6.** If a learner is under 18 or is in the receipt of an Educational Health Carer plan (EHCP) we will require two emergency contact numbers at the enrolment stage.
- 4.2.7.** If a learner is a vulnerable adult, we will require parental or next of kin details, alongside details regarding their carer, carer organisation or key worker.
- 4.2.8.** Under no circumstances will a WAES volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.
- 4.2.9.** If a learner is living in 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).
- All low-level concerns need to be reported to the Designated Safeguarding Lead.
  - All low-level concerns related to agency staff or contractors, must be reported to their employer or agency.
- 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 any adult 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’ (we are using the term peer on peer or bullying) or adult sexual violence or 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 the two college nurseries or any child protection referrals for learners who are aged 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 Additional Learning Support.
- 4.3.8.** Any poor learner behaviour is monitored, if concerns are linked with changes in behaviour or nonattendance at WAES, the learner is reported directly to a safeguarding officer. Each review monitors progress and assesses if increased support structures are required.
- 4.3.9. Key Information – Keeping Children Safe in Education**
- The below elements are covered during ‘in house’, staff training modules.
  - Domestic abuse is a key safeguarding issue that all staff should be aware of.

- WAES Nursery, Diversity and Inclusion are cohorts to give increased monitoring.
- Psychological, Physical, Sexual, Financial and Emotional abuse, can impact children or adults through sensory, seeing or hearing the effects of domestic abuse, or experiencing it through their own intimate relationship.
- We must be alert to the possibilities that 'Children' and 'Adults, may not feel ready or know how to tell someone they are being abused. The identification of signs and monitoring will be reinforced through mandatory staff training.
- If appropriate we must explain to younger learners or learners with disabilities (Diversity and Inclusion) that the law is in place to protect rather than criminalise them.
- Explain the importance of understanding intra- familiar harms, and any necessary support for siblings following any incident (We are involved in or have been notified about).
- We must consciously be aware of implications of the Public Sector Equality Duty (PSED). This includes a need to be conscious that any learner with protected characteristics may be more at risk of harm.

## **5. Training and Support**

- 5.1.** The Service will provide appropriate guidance and training on this policy and its contents to all staff governors.
- 5.2.** Mandatory training is required for all new staff to complete as part of the induction process. Learners will receive information on Safeguarding and Prevent as part of the WAES learner Induction process.
- 5.3.** Staff will receive updates annually; staff will receive update refresher training delivered every two years, earlier if changes in legislation or key priorities occur. Staff receive e-Safety to include filtering and monitoring, Health Relationships, Safeguarding & Prevent and how to identify and refer learners to Safeguarding.
- 5.4.** 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](mailto:safeguarding@waes.ac.uk) dedicated email address or contact a safeguarding officer directly, 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. In 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 records
  - Take all allegations or disclosures seriously (never judge)
  - Reassure the individual that they are right to disclose
  - Explain what will happen next e.g., safeguarding referral is being made. The 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 any immediate 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 the safeguarding team)
- 6.7. Following the disclosure and the referral, staff may be involved in several 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

- 6.8. 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 HR.
- 6.9. All other safeguarding concerns regarding learners or children can be dealt with by the Designated Safeguarding Officers on the published list.
- 6.10. Posters promoting the Safeguarding Officers can be found in all classrooms, every toilet block and on most notice boards across the service.
- 6.11. The Principal and Head of Service will centrally retain records of all referrals made by Safeguarding Officers.

## 7. Safeguarding Team

### Designated Lead Safeguarding Officer:

<b>Arinola Edeh</b>	<i>Principal and Head of Service</i>
---------------------	--------------------------------------

### Designated Safeguarding Officers:

<b>Alison Muggridge</b>	<i>Assistant Principal</i>
<b>Annette Robson</b>	<i>Head of Learner Development</i>
<b>Carol Glasglow</b>	<i>Childcare Manager (Child Protection Lead)</i>
<b>Maysie Brown</b>	<i>Diversity and Inclusion Co-ordinator</i>

### Designated Safeguarding Governor:

<b>Naomi Leaver</b>	<i>Governor</i>
---------------------	-----------------

## 8. Preventing Extremism and Radicalisation

- 8.1. WAES recognises that safeguarding against radicalisation and preventing extremism is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility 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.

- 8.3. At WAES the role of the Designated Safeguarding Lead includes the responsibilities of the Prevent Agenda strand of the Government's counter-terrorism strategy.
- 8.4. 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:** Lisson Grove quiet space, signposting learners, issuing maps and promotions through posters at other locations.
  - **Work-based learners including Apprenticeships, 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

The Risk Register is updated annually.

## 9. Practice

- 9.1. WAES uses the following accepted Governmental definition of extremism which is, a clear overview outlining all elements under Fundamental British Values.

‘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’.

- 9.2. As a Service, we recognise that extremism and exposure to extremist materials and influences can 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.

**9.3.** 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.

**9.4. As part of wider Safeguarding responsibilities, WAES staff will be alert to:**

**9.4.1.** Disclosures made by learners of their exposure to the extremist materials, views expressed outside of the service, such as in their homes or community groups, especially where learners have not actively sought these out.

**9.4.2.** Graffiti symbols, writing or artwork promoting extremist messages or image, if identified.

**9.4.3.** Learners accessing extremist material online, including through social networking sites.

**9.4.4.** Parental reports of changes in learner behaviour, friendship circles, or any actions or requests for wider assistance.

**9.4.5.** Partner organisation feedback, local authority updates, or police reports of issues affecting learners in other settings.

**9.4.6.** 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.

**9.4.7.** Intolerance of individual difference, whether secular or religious or, contradictory with our EDI policy, views based on, but not exclusive to, gender, disability, religious beliefs, homophobia, race, ethnicity, or culture.

**9.4.8.** Attempts to impose extremist views or practices on others.

**9.4.9.** Anti-Western or Anti-British views (to include any right-wing extremist views or practices)

**9.4.10.** 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's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.



**9.4.11.** 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.

**9.4.12.** 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.

## **10. Approach**

**10.1.** 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.

**10.2.** 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 equipped to recognise extremism and are skilled and confident enough to challenge it.

**10.3.** 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.

**10.4.** Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution.

**10.5.** 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.

**10.6.** 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.

**10.7.** 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.

- 10.8.** The Fundamental British Values are fully integrated in our Teaching and Learning Curriculum, Observation of Teaching Learning and Assessment Policy and promoted during through observation walks, classrooms walls and central notice boards across the service.

## **11 Use of External Agencies and Speakers**

**11.1** 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 and do not marginalise any communities, groups, or individuals.
- messages will 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 other ideologies.
- Learner activities are matched to the needs of learners and the course.
- Activities are carefully evaluated by services to ensure that they are effective and appropriate.
- We recognise, however, that our ethos is to encourage learners to understand opposing views and ideologies. We actively engage learners in informed debate, and we may use external agencies or speakers to facilitate and support this.

## **12 Whistle Blowing**

**12.1** When employees have concerns about the safety or the interests of others or the Service may be at risk, the Westminster City Council Whistle Blowing Policy must be used. Details of this are available from the HR Team.

## **13 External Trips or Visits**

**13.1** 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.

## **14 Work-based learners including Apprenticeships, Traineeships and Employability Sectors Based Work Academy Programmes**

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

**14.2** Learners who are identified as vulnerable or 'at-risk' through 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.

**14.3** Learners who are referred to external agencies, such as GP's, Adult Services, Children's Services, or 'Other' organisations will be facilitated through the Safeguarding Lead.

### **14.4 Apprentice Learners**

Assessors will communicate to learners regularly, any issues related to welfare is discussed and support is implemented.

- 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 or abuse, 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 if meeting the threshold. WAES will attend remotely or in person depending on location and Local Authority agreement.

## **15 Equality legislation**

- We must consciously be aware of implications of the Public Sector Equality Duty (PSED). This includes a need to be conscious that any learner with protected characteristics may be more at risk of harm.
- Safeguarding legislation must cross reference the Equality Act 2010.

- We must not unlawfully discriminate against learners with protected characteristics.
- We must consider how best to support learners with protected characteristics. For example, making reasonable adjustments for disabled learners with EHCP, supporting girls if there is evidence that they are being disproportionately subjected to sexual violence or harassment.

**Policies that work alongside the Safeguarding and Prevent policy:**

1. Safeguarding Policy for Guests and Visitors at Westminster Adult Education Service (summary document found at each reception location)
2. E-safety policy Updated – Updated Safeguarding 2023
3. Prevent Risk Register – Updated September 2023
4. Death of a Learner Procedure (appendix 1 Safeguarding Policy)
5. Equality, Diversity, and Inclusion Policy
6. DBS Policy
7. Whistleblowing Policy
8. Admissions Policy
9. Learning Support Policy
10. WAES room hire, terms and Conditions Policy
11. Learner Behaviour Policy
12. GDPR Policy (WCC)
13. Volunteers Policy
14. Risk Assessment Documentation

Appendix 1

**Westminster Adult Education Service Bereavement Procedure (part of WAES Safeguarding)**

Overview

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 have both Safeguarding and Welfare support and can access various external organisations.

However, even though we are post Covid 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.

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 would 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. (if the notification is via the information line or phone line, the Learner Experience Officer will pass this information onto the principal and Safeguarding)
2. The principal will formally write to the learner's family to express sympathy on behalf WAES and the Board 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 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.
5. People react to grief in many ways, including some that are not always obvious. This can be very difficult to spot, 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 their social 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.

6. Administration will make available a virtual or handwritten 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.
7. 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 mechanism to assist them moving on.

### **Information and support for WAES staff**

1. The Principal or Assistant Principals in the event of a learner's bereavement will communicate with all staff that are impacted.
2. 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.
3. The principal will inform the Chair of the Governors and all members of the WAES governing body.
4. The principal will also inform any relevant external partners.
5. If 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.
6. The Assistant Principal for Business Support will liaise directly with MIS and ensure that relevant College records are amended.

## 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:

#### Never use physical restraint

- Do not take a child, learner, young person, or vulnerable adult alone in a vehicle on journeys, 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 person, or vulnerable adult.
- If a child, learner, young person, or vulnerable adult accuses a learner or member of staff of abuse 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 just recent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusation from a child, learner, young person, or 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 work with 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, and it 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 enrolls 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 (KCSE), 2023  
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, 2022  
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, 2023  
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, 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 which falls 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 engaging others; 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.

*Definitions 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 16 or 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 Marriages)  
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 where a 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.

### **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 identify), race, religion, or sexual orientation and meets our obligations under the Equality Act 2010.

<b>Name of Policy/ Procedure</b>	<b>Safeguarding and Prevention of Radicalisation Policy</b>
<b>Equality Impact Analysis</b>	If it is not relevant to this function give reasons and proceed to section 5.
In what ways could this function have an impact on any of the groups above? What actions have been taken to eliminate this?	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 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.
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.
What evidence supports your judgement eg. Observations, consultations, expert opinions, quantitative or qualitative survey's. If the evidence is in form of additional documentation where is this stored?	Comprehensive and up to date safeguarding records.
Has this function taken into account and cross-referenced where appropriate to safeguarding policy and procedures? Give details.	GDPR regulations have been considered and actins comply with data protection requirements.
Owner Date Sign	AERobson 1.9.2023 Annette Elizabeth Robson

<b>Version</b>	<b>Date</b>	<b>Revision Author</b>	<b>Summary of changes</b>
1	Oct 2021	Annette Elizabeth Robson	New Format.
2	Nov 2021	Annette Elizabeth Robson	Update KCSIE legislation September 2021
3	Sept 2022	Annette Elizabeth Robson	Added KCSIE updates for 2022 see appendix 5.

			Updated names of safeguarding leads.
4	Sept 2023	Annette Elizabeth Robson	A full review of the policy and added all KCSIIE updates. Updated Safeguarding Governor