Safeguarding and Prevent Policy and Procedure

Document Information	
Title	Safeguarding and Prevent Policy and Procedure
Version	5.0
Status	Approved
First Issued	March 2018
Maintained by	Head of Business Operations and Students Services and Designated Safeguarding Lead (DSL)
Next Review Date	October 2024

Revision History		
Version	Date	Details
1.0	January 2018	Review of previous safeguarding and prevent policies and procedure to create a merged document
2.0	December 2018	Annual review. To include new 2018 guidance
3.0	November 2019	Annual review. Changes to named officers and inclusion of sub-contractor details
4.0	October 2020	Annual review. Changes to updated gov. legislation
4.2	February 2021	Inclusion of online safeguarding alert form, Digital Strategy, removal of appendices F and G (Staff Guides) and update to change of terror alert level
4.3	February 2022	Annual review, update terror alert level, DBS process statutory guidance and response to sexual violence and harassment in schools and colleges guidance
4.4	November 2022	Annual review with minor changes incorporated
5.0	October 2023	Annual Review - changes to: Named Designated Safeguarding Officers, Safeguarding Monitoring Panel, Safer Recruitment, External Support Workers, Convictions, KCSIE - Filtering and Monitoring, PEEPS, Referrals to ASC and MASH, Reflection Room, Revised Prevent Duty added

SAFEGUARDING AND PREVENT POLICY AND PROCEDURE

1. Purpose of the Policy

This policy states the responsibilities of Adult Education Wolverhampton (AEW) in relation to safeguarding children and adults at risk, in response to current legislation and guidance.

It supports the implementation of our Mission Statement:

"To make a positive difference to the lives of individuals and communities through high quality learning that inspires, challenges and leads to further learning and employment"

2. Policy Statement

AEW is committed to a positive policy of equal opportunity and strives to support its learning community wherever possible. AEW prioritises safeguarding by promoting the welfare of students, staff and visitors and fosters a positive culture where students are able to learn and develop in an environment that is safe and welcoming. The welfare of our learning community is of paramount importance. AEW recognises its duty to promote and safeguard the welfare of children, young people and adults at risk receiving education and training at AEW.

AEW is committed to ensuring our practices, education and initiatives promote all aspects of health and safety, general well-being and good mental health of our AEW community.

This policy states how AEW carries out its obligation to protect children, young people and adults at risk from harm. The service will work with relevant internal and external agencies to achieve this and expects all staff, students and visitors to share this commitment. In particular, to fulfil our statutory duty to assist the local authority with child protection issues and adults at risk.

All staff believe that the service should provide a safe, caring, positive and stimulating environment, continually building a culture of safety that enhances the learning environment of the individual students. We will empower students to create communities that are more resilient to extremism and protect the well-being of particular students or groups who may be vulnerable, promoting and reinforcing shared British values whilst creating space for open debate.

All staff are required to read this policy and Part 1 of 'Keeping Children Safe in Education' 2023 as part of their induction. It is also shared more broadly with all staff through CPD via email. The legal framework of this policy is included in appendix A.

3. Values and Behaviours

British values are integral to all involved with AEW activity. British values form the basis of citizenship within AEW community and across modern Britain. AEW promote and exemplify these values to students, staff and visitors and they are at the heart of all activity.

British values are defined as:

- democracy
- the rule of the law
- individual liberty
- mutual respect and tolerance for those with different faiths and beliefs

AEW also promote service values in line to achieving its mission and vision. AEW values are determined by the acronym PRIDE, illustrated below:

P	Professionalism	Maintaining the highest standards of service and conduct at all times
R	Respect	For our students, our communities, the environment and each other
I	Integrity	Doing the right thing; being honest, trustworthy, ethical and fair
D	Diversity	Learning from and valuing the diversity that our students, our staff and our communities bring to our Service
E	Excellence	Striving to achieve consistently highest standards and to exceed the expectations of our students and other stakeholders

The Student Charter is promoted on every classroom wall, in the Student Handbook and reinforced through induction. It confirms AEW expectations of our students and what they can expect in return.

The Staff Code of Conduct clarifies responsibilities expected as an AEW employee.

4. Scope

This policy applies to all those working in, studying and visiting any AEW site. This includes students, staff, including volunteers and all support workers, Advisory Board members, contracted services, employers offering work placements and visitors. A definition of terms can be found in appendix B. Types of abuse can be found in appendix C.

5. Management and Governance

5.1. The Advisory Board

A safeguarding Advisory Board Ambassador is identified. They are responsible for:

- Liaising with the Deputy Head of Service and DSL regarding safeguarding
- Ensuring that the Advisory Board considers Safeguarding and Prevent a priority
- Providing support and challenge on the Annual Report prior to publication
- Offering challenge and expertise to support safeguarding in AEW
- Ensure all new members receive safeguarding induction training to ensure their understanding of their important strategic role, as well as their legislative responsibilities and this is updated regularly

5.2. Senior Nominated Lead

The Senior Manager Business Operations (Student Services, Marketing and MIS/ DSL) is the nominated safeguarding lead at senior management level and responsible to ensure standardisation and parity between policy and practice.

5.3. Designated Lead Safeguarding Officer (DLSO)

The DSLO takes responsibility for safeguarding and child protection, including online safety. They provide advice and support to other staff on child welfare, child protection matters and safeguarding, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so. They work with appropriate partners to safeguard young people and adults at risk of harm and have particular responsibility to be available to listen to young people and adults at risk of harm studying at AEW. They maintain accurate and timely records of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral) and make appropriate referrals to relevant agencies of suspected abuse or allegations.

5.4. Named Safeguarding Officers

Student Services staff and the Facilities Officer are named safeguarding officers. Their role is to support the DLSO.

Jasi Bridgman	Designated Safeguarding Lead	07977 849455 jasi.bridgman@aes.wolverhampton.gov.uk
Leanne Cooper	Designated Safeguarding Officer	07854 491242 Leanne.cooper@eas.wolverhampton.gov.uk
Bradley Hughes	Designated Safeguarding Officer	07971 991893 bradley.hughes@eas.wolverhampton.gov.uk
Maria Perrins	Designated Safeguarding Officer	07855 281580 maria.perrins@aes.wolverhampton.gov.uk
Lee Southall	Designated Safeguarding Officer	01902 558175 lee.southall@aes.wolverhampton.gov.uk
Designated staff can also be contacted via: safe@aes.wolverhampton.gov.uk		

5.5. Safeguarding Monitoring Panel

The safeguarding monitoring panel is made up of the safeguarding officers, Curriculum Manager for Quality, Education and Skills, Curriculum Manager for Marketing and Continuing Education, Life Skills and Like Minds, Senior Manager Business Operations Manager (Student Services, Marketing and MIS/ DSL).

The safeguarding monitoring panel oversees all aspects of safeguarding within the service by:

    i. Meeting half-termly to review developments and monitor activities
    ii. Developing and implementing an annual quality improvement plan to ensure that there is a whole service approach to safeguarding
    iii. Monitor types and volume of disclosures termly
    iv. Review and update service safeguarding policy and procedures annually
    v. Lead on specific safeguarding themes, reporting on activity and agreed areas of development
    vi. Update staff at CPD events, termly newsletters and offer aspects of training

6. Safer Recruitment and Selection

AEW recognises the importance of creating a culture of safer recruitment to deter, reject or identify individuals who may abuse. Practice adopted to prevent the appointment of unsuitable people can be found in appendix D. AEW follow Wolverhampton City Council's Recruitment and Selection Policy and Procedure. To reinforce safer recruitment, an annual declaration is sent to all staff to which staff are required to agree.

6.1. Regulated activity and DBS checks

All staff and volunteers are required to have a DBS certificate before they commence in post. Line Managers, supported by the Administration Officer, will ensure that roles in scope, will begin the DBS checking procedure using the online portal. Appropriate ID will be checked. The DBS number and renewal date will be recorded by the Administration Officer on the single central record (SCR).

Appointments into roles made through employment agencies are also in scope for the appropriate DBS check which is carried out by the agency.

Subcontracting staff are required to have a DBS certificate in place for staff involved in delivery. AEW maintain a record of the certificate number and date of the check.

Individuals not employed by AEW who provide support for students with additional support needs must hold a clear DBS. Agencies are required to supply a letter of assurance that all staff provided by them have a clear enhanced DBS certificate and have completed Safeguarding training within last 2 years.

Any support workers not employed by an agency, and who do not have access to obtaining a DBS should follow the External Support process which includes completing an AEW Volunteer application form. A DBS application will be applied for through AEW and will follow the same process.

Volunteers will be required to have a DBS. The application will be made through AEW.

DBS checks for staff, external support workers and volunteers in scope will be renewed every 3 years. However, if a member of staff changes roles within AEW, it may be necessary for their check to be renewed.

In line with ESFA Contract requirements all staff with a DBS will be required to declare with immediate effect annually whether there has been a change in their circumstances relating to the background checks.

This annual declaration is mandatory and made by Staff at the beginning of each academic year.

The name of any member of staff considered not suitable to work with children will be notified to the DfE Teachers Misconduct Team with the advice and support of HR.

The responsibility for keeping a single record of DBS is the Deputy Head of Service

Risk assessments will be carried out by the Deputy Head of Service or Business Manager for any member of staff or applicant where criminal history has been disclosed. The assessment will take account of:

- Nature, seriousness and relevance
- How long ago it occurred
- Whether it was a one-off or part of a history
- Circumstances of it being committed
- Changes in the individual's personal circumstances
- Country of conviction
- Decriminalisation

6.2. Single Central Record

The single central record is maintained by an Administrative Officer, AEW. It includes details about staff, agency staff and volunteers (including external support workers).

Employment agencies are responsible for maintaining a SCR for staff employed to work at AEW and will provide written confirmation that all the relevant checks have been carried out.

The University is responsible for carrying out appropriate checks for PGCE students on placement at AEW and will provide written confirmation that all the relevant checks have been carried out.

The SCR confirms that relevant checks have been completed including:

- an identity check
- a barred list check
- an enhanced DBS check
- further checks on people living or working outside the UK
- a check of professional qualifications
- a check to establish the person's right to work in the United Kingdom

Sample records from the SCR are checked regularly by the Deputy Head of Service to ensure accurate information is being maintained.

An audit of the single central record will take place annually.

7. Staff Induction and Training

The Designated Safeguarding Lead (DSL) and named safeguarding officers undertake appropriate safeguarding training and inter-agency working training (provided by Wolverhampton Safeguarding Together) and also Designated Safeguarding Lead training. The training should be updated every two years. The safeguarding officers will undertake Prevent awareness training. In addition to their formal training, their knowledge and skills will be updated at regular intervals, but at least annually to keep up with any developments relevant to their role.

All staff will receive annual safeguarding training. They will receive updates (for example via email, 'Safe and Sound' e-bulletins and staff meetings) as required but at least annually.

It is the line manager's responsibility to follow the service induction procedure and direct the member of staff to the following documents, which should be read and understood:

- the Safeguarding and Prevent Policy and Procedure
- Part 1 and Annex A - Keeping children safe in education 2023
- Whistleblowing policy and procedure
- Staff Code of Conduct

The Business Manager is responsible for ensuring that an effective system is in place for monitoring and recording that staff and volunteers have successfully completed their induction into the service within the required timescales. The day-to-day administration of this system will be undertaken by the Administration Officer.

8. Safeguarding - a whole service approach

8.1. Creating a safe environment

The service will:

i. All staff and visitors will comply with the service's Student Staff & Visitor Identification & Access Policy

ii. Ensure that all staff, including volunteers, are recruited in line with the corporate policy and safer recruitment practices and guidance

iii. Ensure that all staff have an enhanced DBS

iv. Ensure all venues are a safe environment for students and staff

v. Continually review the safety and security across the service, through the Safeguarding Monitoring Panel

vi. Ensure risk assessments are undertaken at all main sites, and outreach venues including fire and activity

vii. Take all reasonable measures to ensure that risks of harm are minimised by appropriate risk assessment and management

viii. Ensure staff, volunteers, students, contractors and visitors wear ID badges at all times

ix. External support workers are required to sign in and out at reception and wear a visitor ID card, even when accompanying a student. They are also issued with the staff code of conduct

x. All visitors and contractors will receive information on service safeguarding, health and safety and equality and diversity requirements

xi. Have written procedures for following up issues of conduct for both staff and students

xii. Operate a 'zero tolerance' approach to weapons, drugs, alcohol and bullying, prejudice or discrimination, including sexism and misogyny/misandry, including cyber or electronic bullying including online sexual abuse, sexual harassment and violence in all forms.

xiii. Raise awareness that harmful sexual abuse towards or between students is unacceptable, students will receive support to raise concerns and can be reassured their concerns will be dealt with sensitively, quickly and appropriately.

xiv. Be vigilant to extremism, radicalisation, and hate crime

xv. React quickly and appropriately to reports or concerns of abuse, following AEW safeguarding procedures

xvi. Promptly follow up on any student attendance concerns, particularly those with vulnerabilities.

xvii. Apply the same appropriate standards regardless of gender, sexuality or disability

xviii. Report any concerns about other staff to their line manager, DSL or member of the senior management team

xix. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in any processes

xx. Staff should feel confident to use the whistleblowing policy and procedure if they feel that genuine concerns are not being addressed

8.2. Positive promotion

Safeguarding, in its broadest sense, will be promoted positively throughout the service in a number of ways, including:

i. Commitment to safeguarding will be available on the service website

ii. Policy and procedures will be available on the intranet and website and upon request (refer to section 17 for a list of the policies, procedures and guidance)

iii. Information provided to students during course induction (in the Student Handbook)

iv. Health and wellbeing, anti-bulling, e-safety, British values, safeguarding and prevent will be promoted throughout the academic year in all curriculum areas

v. Positive and appropriate sexual behaviour will be promoted throughout the academic year

vi. Safeguarding and Prevent is included within the 'student voice' process

vii. Safeguarding and Equality issues to be included as an agenda item in all staff meetings

viii. Providing awareness raising posters, messages in AEW publicity, publications and across the Service

8.3. Support for students

Students will be offered support through a number of mechanisms, which include:

i. Additional support for students with learning difficulties or disabilities

ii. Support assessments for Life Skills students

iii. Wellbeing conversations with clinically extremely vulnerable students

iv. Maintaining links to other relevant agencies or services to signpost for relevant support

v. Ensuring the needs of the individual are at the heart of any intervention

vi. Relevant criminal conviction (RCC) Risk Assessments

vii. Receiving information about who they can talk to if they have any concerns

viii. Being taught how they can keep themselves safe (i.e. online safety, prevent module, critical incident protocol, healthy relationships etc)

ix. Ensuring it is clear about who they should talk to if they have a concern (e.g. publicity, student induction, tutor safeguarding slide etc.)

x. All students will be supported to report concerns and can be confident that they will be taken seriously and dealt with swiftly and appropriately. Information provided will only be shared on a need-to-know basis.

xi. Assume that sexual harassment and online sexual abuse are happening at AEW, even if there have been no specific concerns raised as per the findings and recommendation of Ofsted's review of sexual abuse in schools and colleges.

(https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101422 24/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

8.4. Evacuation - Personal Emergency Evacuation Plan (PEEPS)

Students that require assistance to evacuate the building must have a PEEP drawn up between the student, teacher, support worker and sites staff where appropriate. This will be kept in a secure place for use in emergency. Sites staff ensure this is in place for all users in their buildings where a PEEP is identified, and staff are made aware of who has a PEEP and where details can be found.

8.5. Convictions

i. Anyone with a criminal conviction, pending prosecution, or for those who may be tagged an appropriate risk assessment will be carried out and implemented.

ii. Risk assessments should be carried out by a DSO/DSL and in partnership where appropriate e.g. Probation Officer. Outcome of the risk assessment should only be shared on a need-to-know basis and stored securely.

9. Freedom of speech

AEW upholds the fundamental importance of freedom of thought and expression, whilst maintaining dignity and respect for all. Freedom of speech is important for student to develop and learn. However, free speech which seeks to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued and is subject to laws and policies governing human rights, equality, community safety and community cohesion.

AEW will not suppress freedom to express controversial or unpopular views, unless points of view constitute:

- incitement to riot
- insurrection
- Hate Crime on the basis of:
  - Race
  - Religion
  - Disability
  - Sexual orientation
- sexual harassment or
- other activity that are likely to cause a breach of the peace or public disorder or otherwise to be unlawful

This statement is designed to support the safeguarding and wellbeing of students and staff and to also reduce the risk of adverse publicity for AEW.

This applies to all staff, students and visitors.

AEW will take action, under either the relevant staff disciplinary procedure or the Student Conduct Policy should there be any breaches.

Encouragement of terrorism and inviting support for terrorist organisations are criminal offences. AEW will not provide a platform for these offences to be committed.

10.Prevent

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. AEW recognises its duty to protect children and vulnerable people from being exposed to extreme views, which may lead to radicalisation (Section 26 of the Counter-Terrorism and Security Act 2015). Extreme views may seek to validate political, religious, sexist, homophobic or racist violence, or to steer them into a rigid and restricted ideology that does not tolerate diversity. This could include messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

10.1. Definitions

Definitions given by the Government in the Prevent Strategy:

i. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

ii. Extremism is:

- 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.
- We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

i. Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;

ii. Seek to provoke others to terrorist acts;

iii. Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or

iv. Foster hatred, which might lead to inter-community violence in the UK.

10.2. AEW Approach to Prevent

- Is clear that exploitation and radicalisation should be viewed as a safeguarding concern and addressed through our safeguarding procedures
- Will work with partners to prevent students becoming victims or causes of harm
- Values freedom of speech as part of its commitment to equality and diversity. It promotes the expansion of beliefs / ideology as fundamental rights underpinning our society's values and to promote learning
- Will work with staff to:

    i. Ensure staff recruitment and induction materials are effective in safeguarding students.

    ii. Promote responsible and effective use of ICT to prevent accessing illegal and inappropriate content. Websites and social networking sites are vehicles for extremists to promote their message and encourage engagement.

    iii. Raise awareness about the threat from violent extremist groups.

    iv. Develop a clear understanding and recognition of the risks and vulnerabilities of radicalisation.

    v. Promote the positive contribution we can make to enable resilient communities.

    vi. Develop confidence to promote and exemplify fundamental British values in the management, the curriculum and through behaviours across the organisation.

vii. Promote the importance of protecting the well-being and equalities of students or groups who may be vulnerable to being drawn into violent extremist activity.

10.3. Risk

There are 5 levels of threat of terrorism. The current terror level indicating a threat to the UK from international terrorism can be found https://www.gov.uk/terrorism-national-emergency. Terrorism in the United Kingdom may include exploitation of vulnerable people, to involve them in terrorism or an activity in support of terrorism. Terrorist groups who pose a threat seek to radicalise and recruit people to their cause. The amount of people who are actually prepared to support violent extremism is very small, however it is significantly greater amongst young people who are vulnerable to manipulation and exploitation.

10.4. Reducing Risk

The Senior Management Team and the DSL:

- establish or use existing mechanisms for understanding the risk of radicalisation
- ensure staff understand the risk and build the capabilities to deal with it
- communicate and promote the importance of the duty
- ensure staff implement the duty effectively

The Senior Management team and DSL assess the level of risk within the Service. The Safeguarding Monitoring Panel is tasked to implement actions to reduce that risk. Areas for consideration include:

- Risk assessing external speakers and the use of our premises by external organisations
- The curriculum offer
- Provision specifically targeting vulnerable groups
- Safeguarding cases
- Equality and diversity cases
- Work closely with the Regional Prevent Co-ordinator, Channel Panel and other agencies
- Attend training events to keep up to date with changes and sharing of information
- Any other issues specific to the organisation and our community

10.5. Interventions

The majority of people do not become involved in extremist activity so interventions must be relevant and proportionate. It is important to be aware that most interventions are likely to be related to mental health, drug/alcohol or relationship issues.

10.6. Channel Panel

The DSL will attend Channel Panel and will refer any relevant cases to support the necessary interventions required with a multi-agency approach to support individuals at risk.

10.7. Indicators of radicalisation

There is no defined profile of an extremist. Individuals who become involved in extremist activity come from a range of backgrounds and experiences.

10.8. Indicators of vulnerability

Students may be receptive to radicalisation through various social, personal and environmental factors. Extremists will take advantage of an individual's vulnerabilities to create a divide between them and their families and communities. It is vital that staff are able to recognise those at risk and exhibiting:

- Identity Crisis - the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis - this may include one or more of the following:

    i. family tensions
    ii. sense of isolation
    iii. low self-esteem
    iv. dissociated from existing friendship group
    v. becoming involved with a new and different group of friends
    vi. searching for answers to questions about identity
    vii. faith and belonging
    viii. community tensions
    ix. events affecting the student's country or region of origin
    x. aspects of Government policy
    xi. feeling of failure, injustice and/or rejection
    xii. Criminal Behaviour - involvement with criminal groups, imprisonment, and poor habitation/reintegration;
    xiii. Mental Health and addiction issues

11. Digital Safety

Keeping students and staff safe during remote service delivery is essential. To achieve this AEW will ensure:

- Staff are adequately trained and supported to work and teach remotely,
- Online safety messages are promoted across the service,
- Students have access to a laptop loan and connectivity access service to access online learning
- Students who learn online as part of their course receive a digital induction which includes:
    - safely managing online information
    - privacy and security
    - identifying and reporting concerns
    - how to confidently access and navigate their learning platform
    - students' well-being is prioritised
    - Online sexual abuse in any form is unacceptable and will be addressed
- Students are supported to continue to learn and have access to high quality online resources linked to their course aims and objectives
- Our approach to online safety and the use of mobile technology is based on addressing the following 4 key categories of risk:
    - content - being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
    - contact - being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- conduct - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and/or financial scams
- To meet our aims and address the risks above we will educate students about online safety as part of our curriculum, including:
    - the safe use of social media, the internet and technology
    - keeping personal information private
    - how to recognise unacceptable behaviour online
    - how to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
    - train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation
    - carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the service

For further information, refer to the AEW ICT Acceptable Use policy which should be read in conjunction with this document.

- Staff digital communication with students or carers through online learning platforms. When using communication technologies, staff should ensure:
    - that the technologies they use are officially sanctioned by the service
    - any digital communication between staff and students or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content and sent within sensible working hours
    - personal e-mail addresses, text messaging or social media are not be used for these communications
    - they follow good practice when using personal social media regarding their own professional reputation and that of the service
    - staff should immediately report to a
    - DSO or DSL the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication
    - relevant policies and permissions should be followed when posting information online e.g., service website and social media.
    - only service e-mail addresses should be used to identify members of staff and learners.

12. Responding to a Disclosure or Suspicion of Abuse

12.1. In the event of an emergency

Contact the emergency services by phoning 999.

12.2. Wolverhampton Adult Safeguarding

Adult Assessment Team - 01902 551199
In an emergency call: 999
E-mail: SafeguardingAIA@wolverhampton.gov.uk

12.3. Child Safety - Multi Agency Safeguarding Hub (MASH)

To report any concerns about a child's safety or wellbeing telephone 01902 555392.
Outside office hours for emergencies call 01902 552999
In an emergency call: 999
Or an Electronic Multi-Agency Referral Form (EMARF) should be completed to report any concern or incident

12.4. To report a non-urgent crime

Contact emergency services by phoning 101.

12.5. Safeguarding concern

Any member of staff who has knowledge of or a suspicion that, a person is or has been suffering significant harm must refer their concern on the same day to a designated member of staff and an account made in writing, preferably using the online Safeguarding Concern Form which can be found on the Safeguarding page of the staff intranet.

All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in the first instance. However, the student should be assured that all matters will be dealt with discreetly.

Questions should be kept to the minimum required for clarity, and leading questions must be avoided. Judgments should not be made. The information should be factual and not include opinions or personal interpretation of the facts (what you see, what you hear and what you are told). It should be detailed and accurate and where possible use the person's own words.

Any safeguarding concerns relating to students attending classes held in the evening that require immediate attention should be raised in the first instance with the manager on safeguarding duty.

Staff with any concern that there may be a risk of radicalisation or involvement in terrorism should treat it the same as any other safeguarding concern.

12.6. ICT - Web Filtering and Monitoring

The service has effective filtering and monitoring software known as Smoothwall to control and restrict access to harmful or inappropriate websites and content. It monitors, filters, and raises alerts for all students and staff and is monitored by the DSL and DSOs daily. Concerns involving a student will be dealt by a DSO or DSL and be recorded on the central restricted safeguarding log. Concerns involving staff will be dealt with by the DSL or Deputy Head of Service and kept securely.

12.7. What happens next?

It is the responsibility of the designated officers to check the detail of the concern/allegations and decide the best course of action. The concern raised will be categorised according to risk. If assessed as a low risk, clear advice and guidance will be provided to the referrer to address through classroom management or other internal options. If assessed as a medium risk, the safeguarding officer will liaise with staff and outside support organisations for the benefit of the individual. High-risk cases will require reporting to:

  i. Wolverhampton Multi-Agency Safeguarding Hub (MASH) (information about MASH can be found on AEW Staff Intranet on the Safeguarding page),
 ii. police
iii. National Referral Mechanism for Modern Slavery and Human Trafficking
 iv. Raise a Prevent referral or contact Counter Terrorist Police

13. Confidentiality

A good working relationship between staff and students depends to a large extent on the establishment of trust. This may be described as a "confidential relationship". However, guarantees of absolute confidentiality should not be given. If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

All safeguarding records and supporting information are stored securely in accordance with the GDPR and Data Protection 2018.

14. Allegations against Staff

If allegations are made against a member of staff by a student, the DLS or member of the Senior Management Team should be informed immediately unless the concern relates to the Deputy Head of Service which should be reported immediately to the service's Strategic Director who will consider the allegations made and establish whether there is a case for an investigation. Relevant disciplinary procedures may be invoked.

Where there are credible child protection concerns, the SMT member will notify the Local Authority Designated Officer (LADO). If there are no credible child protection concerns, internal disciplinary procedures may need to be sued to address the issue.   If the allegation concerns one of the Safeguarding Officers, the Senior Manager/DSL will be appointed to deal with the allegation.

If a student makes a malicious allegation against a member of staff (or others) found to be unsubstantiated, the Student Conduct policy will be followed.

15. External speakers and events

AEW does not seek to restrict fundamental freedom of speech however, the expression of views needs to be balanced with the need to ensure students, staff and visitors are free from harm. All of our events, activities and initiatives should be safe, without risk to AEW, and within the law.

If an external speaker, their topic of discussion or the purpose for room hire has the potential to go against our conditions for a safe event, we are committed to working together with event organisers and in some cases, external speakers themselves, to make sure that we reach a judgement that is reasonable, informed and within the law.

15.1. Definitions

An external speaker, guest speaker or visitor is used to describe any individual or organisation who is not a student or staff member of AEW and who has been invited to speak to students, visitors and/or staff. This includes any individual who is a student or staff member from another institution. It also includes the main contact from any external organisation who is paying to use AEW facilities.

An event is any event, presentation, visit, activity or initiative organised by a student group, individual or staff member that is being held on AEW premises or where AEW is being represented by a stand on other premises e.g. at an exhibition, school event or fair. It includes events where external speakers are streamed live into an event or a pre-recorded film is shown. It also includes activity being held on AEW premises but organised by external organisation.

15.2. Code of Conduct for External Speakers

The person or group arranging the event is responsible for ensuring that all speakers or visitors are made aware of is policy and the code of conduct expected. Speakers should:

i. Abide by the law and our values and policies

ii. Must not advocate or incite hatred, violence or call for the breaking of the law

iii. Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support terrorism

iv. Must not spread hatred and intolerance in the community

v. Must not discriminate or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age

vi. Are not permitted to raise or gather funds for any external organisation or cause without express permission of the Head of Service

15.3. Procedure

An External Speaker and Room Hire Request Form must be completed by the staff member, individual or group making the request at least 14 days before the event. This form is a risk assessment and a transcript of the intended talk should be uploaded to the form. External speakers should read and confirm their agreement via the AEW External Speakers and Room Hire Code of Conduct form (see AEW Staff intranet, Safeguarding page).

The Facilities Officer and the DSL will be responsible to consider the request and one of the following decisions will be made:

i. To not permit the event with the external speaker to go ahead

ii. To not permit the external speaker to attend the event (if it is a wider event)

iii. To fully permit the event with the external speaker to go ahead unrestricted

iv. To permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk. These may include observation; independent filming; the inclusion of opportunities to debate or challenge the view being held will grant or refuse permission

The decision will be final.

AEW reserves the right to cancel, prohibit or delay any venue hire booking with external speakers if the policy is not followed, requested information not produced or if health, safety and security criteria cannot be met.

15.4. Monitoring

Any breach of the Code of Conduct or any concerns raised by any individual should be taken seriously and forwarded to one of the Designated Safeguarding Officers.

The External Speaker and Room Hire Request Form will be stored centrally by the Facilities Officer on the Risk Assessment Database and reported to the Safeguarding Monitoring Panel.

15.5. Reflection Room

Students can book access the reflection room in the Foyer to use for personal reflection time. The room holds a small volume of students max 3. Monitoring periodically takes place by reception staff should more than one student use the room.

16.Displaying external publications (posters and leaflets)

All displayed information should be of good quality, respectful and lawful.

Anyone responsible for displaying or circulating material which is indecent or illegal, or which has the purpose or effect of violating another person's dignity or of creating an intimidating, hostile, degrading, humiliating, offensive or threatening environment or making other feel fearful, anxious or vulnerable will be subject to disciplinary action.

AEW reserves the right to destroy any materials displayed/distributed by individuals or organisations without authorisation.

Any requests from other organisations or individuals to display material on our premises should first seek permission from the Marketing team. The DSL is a member of the Marketing team.

16.1. Material not normally permitted to be displayed/distributed

i. Party political material e.g. election posters and leaflets
ii. Material and advertisements whose contents are proscribed, or which are issued by proscribed organisations
iii. Any material which attacks or comments on another person or views
iv. Any material deemed by AEW to be of a sexually explicit or provocative nature
v. Any material which AEW considers might reasonably cause offence to a member of AEW community or a visitor
vi. Material which is unlawful
vii. Material promoting any paid for or commercial product, service, subscription or membership offered by any person or organization
viii. Material which purports to discriminate against persons with Protected Characteristics (Equality Act 2010)

17.Review

This policy and any associated procedures will be reviewed at least on an annual basis and be amended in accordance with legislative changes, changes to locally agreed inter-agency procedures and best practice in education.

This policy should be read in conjunction with other policies, procedures and guidance including:

Student and Visitors	Staff	Staff, Students and Visitors
Complaints, Concerns and Compliments process	Safeguarding and Prevent Policy	Health and Safety policy
Student Charter	Working Alone procedure	Accident and Incident procedure
Student Conduct Policy	Signing in procedure - see Identification & Access Policy	AEW ICT Acceptable Use policy
Admissions Policy and Procedure	Recruitment, Selection Procedure	VLE Terms and Conditions
	Grievance procedure	Student Staff & Visitor Identification & Access Policy
Student Voice Initiatives	Whistle Blowing Policy and Procedure - WCC	External Support Process
	Staff Code of Conduct	Volunteering Policy and Procedure
	Risk Assessment guidance	

Appendix A: Legal Framework

The policy is written against the following legal framework by which AEW delivers its services:

- Equality Act 2010

- Safeguarding Vulnerable Groups Act 2006

- Disability Discrimination Acts 1995 & 2005

- Counter Terrorism and Security Act 2015

- Counter Terrorism Strategy 2015

- Prevent Duty Guidance for Further Education Institutions 2015

- Revised Prevent Duty - Guidance 2015, Published Sept 2023

- Mandatory Reporting of Female Genital Mutilation Oct 2015

- Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015

- Children Act 1989, 2004

- Keeping Children Safe in Education 2023

- Working Together to Safeguard Children 2018, updated Dec 2020

- No Secrets - Department of Health 2000

- Sexual Offences Act 2003

- General Data Protection Regulations and Data Protection 2018

- Mental Health Act 1983

- Mental Capacity Act 2005

- Protection from Harassment Act 1997

- Crime and Disorder Act 1998

- Vetting and Barring Scheme/ Independent Safeguarding Authority 2009

- Care Act 2014

- Further Education and Skills Inspection Handbook (published 14 May 2019, last updated 14 July 2023)

- Ofsted's Review of sexual abuse in schools and colleges (June 2021)

This policy has also been informed by West Midlands Regional multi-agency policy, procedures, and practice guidance.

Appendix B: Definition of Terms

Term	Definition
Child	A person aged up to 18
Young person	Between 12 - 25 years old
Looked after Children	A child who has been in the care of the local authority for more than 24 hours until they turn 18 years old
Care Leavers	Previously been in local authority care. The local authority still has a duty to support care leavers until the age of 21, or 25 if in full time education or have a disability.
Students with special educational needs	Up to the age of 25 who may also need additional services, assistance, protection and consideration
Adult at risk	Aged 18 years or over who is or may be in need of, community care services by reason of mental or other disability, age or illness; or who is or may be unable to take care of him or herself or is unable to protect him or herself against significant harm or exploitation
	Vulnerability can apply to a wide range of disabilities and situations, for example adults with caring responsibilities, the old and frail, asylum seekers, those under a probation order or individuals who have suffered from addiction issues, abuse or trauma.

Appendix C: Types of Abuse

Safeguarding arrangements may be needed to protect young people and/or vulnerable adults from:

- Neglect

- Physical abuse

- Sexual abuse

- Emotional abuse

- Financial or material abuse

- Bullying, including online bullying and prejudice-based bullying

- Racist, disability and homophobic or transphobic abuse

- Gender based violence/ violence against women or girls

- Radicalisation and/or extremist behaviour

- Child sexual exploitation (CSE)

- Student on student abuse, such as sexual violence and harassment

- The impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography

- Substance misuse

- Domestic violence

- Female genital mutilation

- So called honour-based violence

- Forced marriage

- Human trafficking and modern-day slavery

- Child criminal exploitation, including county lines

- Serious violent crime

- Risks linked to using technology and social media, including online bullying; being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'

- Teenage relationship abuse

- Up skirting

- Issues that may be specific to a local area or population, for example gang activity and youth violence

- Fabricated or induced illness

- Poor parenting

- Homelessness

- Other issues that could pose a risk to children, learners and vulnerable adults

Appendix D: Safer Recruitment and Selection Practice

i.	**Define the role**	Job description, specification and advert clearly communicate AEW's expectations, values towards young people, adults at risk or who are vulnerable. There are statements about our commitment to safeguarding
ii.	**Scrutinise applications**	All information is complete. Any gaps in employment history are queried and documented. There is a signed declaration about any relevant criminal records and that all the information is true. All Panel members must have undertaken unconscious bias training and undertaken low level and selection training which has to be refreshed every three years.
iii.	**Agree selection criteria**	Consistent application of criteria for shortlisting and assessment
iv.	**Robust interview**	Structure questions. Rigorous checks for inconsistencies or incomplete information. Probe any gaps, vagueness or areas of concern, taking up any discrepancies with the candidate. Safeguarding related questions will be asked. Notes should be retained
v.	**Gather references**	2 references are required, one must be a current/most recent employer. Never accept open references or testimonials
vi.	**Carry out pre-appointment checks**	Verify identity (including date of birth), right to work in the UK, DBS and overseas checks (for roles defined in table below), professional qualifications and any other concerns