Adult Training Network

Safeguarding Policy and Procedures (Incorporating e safety policy and processes and Prevent Policy including British Values)

Approved by: Sarjeet Singh Gill	**Date:** 28/1/2021	
Reviewed on: 28/1/2021		
Next review due by: 28/1/2022		

Contents

1. PRINCIPLES

1.1 The guidance given in this policy and procedure is based on the six principles of adult safeguarding as outlined by the The Care Act 2014.

Empowerment - People being supported and encouraged to make their own decisions and informed consent.
"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Prevention – It is better to take action before harm occurs.
"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality – The least intrusive response appropriate to the risk presented.
"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."

Protection – Support and representation for those in greatest need.
"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership – Local solutions through services working with their communities.
Communities have a part to play in preventing, detecting and reporting neglect and abuse "I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

Accountability – Accountability and transparency in delivering safeguarding.
"I understand the role of everyone involved in my life and so do they."

1.2 All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.

1.3 Adult Training Network will seek to ensure that we are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

1.4 The rights, dignity and worth of all adults will always be respected.

1.5 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

1.6 We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk'.

1.7 We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within Adult Training Network or elsewhere.

1.8 All allegations will be taken seriously and responded to quickly in line with the relevant local authority Safeguarding Adults Board policies and procedures.

1.9 Adult Training Network recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Board.

1.10 Adult Training Network recognises the role and responsibilities that relate to the protection of children. We understand that the same safeguarding issues that arise for adults can have an impact on children and we fulfil our responsibilities in line with Working Together to Safeguard Children 2018 as well as The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

2. LEGISLATION AND STATUTORY GUIDANCE

2.1 The practices and procedures within this policy are based on the principles contained within legislation and Government Guidance and have been developed to complement the relevant local authority Safeguarding Children and Adults Board's policies and procedures, and take the following into consideration:

- The Care Act 2014, which provides a framework for the care and protection of adults The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006,
- The Data Protection Act 1998
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The Health and Social Care Act 2008 (where applicable)
- 'No Secrets' guidance on protecting vulnerable adults in care (where applicable) Working Together to Safeguard Children 2018

3. DEFINITIONS

3.1 To assist working through and understanding this policy a number of key definitions need to be explained:

3.2 **Adult at Risk** is a person aged 18 or over who is in need of care and support regardless of whether they are receiving them and because of those needs, are unable to protect themselves against abuse or neglect.

3.3 **Abuse** is a violation of an individual's human and civil rights by another person or persons. See below for further information.

3.4 **Adult** is anyone aged 18 or over.

3.5 **Adult safeguarding** is protecting a person's right to live in safety, free from abuse and neglect.

3.6 **Capacity** refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

Types of Abuse and Neglect

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

3.7 **Self-neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

3.8 **Modern Slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce deceive and force individuals into a life of abuse, servitude and inhumane treatment.

3.9 **Domestic Abuse** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence.

3.10 **Discriminatory** – discrimination is abuse, which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

3.11 **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill- treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

3.12 **Physical Abuse** – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

3.13 **Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

3.14 **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

3.15 **Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

3.16 **Emotional or Psychological Abuse** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

3.17 **Cyber Bullying** - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

3.18 **Forced Marriage** - forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

3.19 **Mate Crime** - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

3.20 **Radicalisation** - the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

4. SIGNS AND INDICATORS OF ABUSE

Please remember that different people will have different thresholds of what they think is "ok". Some people may need to be encouraged to recognise and report abuse. Tolerating and living with abuse is never "ok".

Abuse can take place in any context and by all manner of perpetrator. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

4.1 Unexplained bruises or injuries – or lack of medical attention when an injury is present.

4.2 Person has belongings or money going missing.

4.3 Person is not attending / no longer enjoying activities.

4.4 Someone losing or gaining weight / an unkempt appearance.

4.5 A change in the behaviour or confidence of a person.

4.6 They may self-harm.

4.7 They may have a fear of a particular group or individual.

4.8 They may tell you / another person they are being abused – i.e. a disclosure

5. ROLES AND RESPONSIBILITIES

Roles	Name	Contact Details
Designated Safeguarding Lead	Sarjeet Singh Gill	07956484114
Senior Lead for Safeguarding	Kamaljit Kaur	02085749588
Tutor and Deputy Safeguarding Lead for North Hertfordshire	Kansaa Muhsen	07940505967

5.1 It is the responsibility of every member of staff, volunteer and regular visitor to our practice to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of adults. This includes the responsibility to provide a safe environment.

The Senior Safeguarding Lead

5.2 The Senior Safeguarding Lead at Adult Training Network is accountable for ensuring the effectiveness of this policy and our compliance with it.

5.3 The Senior Safeguarding Lead will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance and the requirements of the relevant local authority Safeguarding Children and Adults Board's procedures.
- A senior member of staff is designated to take the lead responsibility for safeguarding.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate child protection training for their role.
- Procedures are in place for dthe relevant local authority with allegations against members of staff and
  volunteers in line with statutory guidance.
- Safer recruitment practices are followed to prevent individuals who may pose a risk from working within the organisation.
- Any weakness with regard to safeguarding arrangements that are brought to their attention will be remedied without delay.
- Policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaison will take place with the Designated Officer for the Local Authority or the Adult Safeguarding Lead in the event of an allegation of abuse being made against a member of staff or volunteer.

The Designated Safeguarding Lead (DSL)

5.4 The Designated Safeguarding Lead is a member of staff who takes lead responsibility for adult and child safeguarding at Adult Training Network.

5.5 The DSL will provide advice and support to other staff on adult welfare and adult and child safeguarding matters. Any concern for an adult's safety or welfare will be recorded in writing and given to the DSL.

5.6 During opening hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available in person, we will ensure that they are available via telephone and any other relevant media.

5.7 Through appropriate training, knowledge and experience our DSL will liaise with Adult's and Children's Services and other agencies where necessary, and make referrals of suspected abuse, take part in strategy discussions and other interagency meetings and contribute to the assessments of adults and children (where appropriate).

5.8 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received relevant safeguarding information during induction and that appropriate training needs are identified.

6. TRAINING & INDUCTION

6.1 When new staff join our organisation, they will be informed of the safeguarding arrangements in place. They will be given a copy of Adult Training Network's safeguarding policy along with a staff code of conduct and told who our Senior Lead for Safeguarding and DSL are. All staff are expected to read these key documents.

6.2 Every new member of staff or volunteer that comes into regular contact with vulnerable adults will receive safeguarding training during their induction period. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure, how to record and the remit of the role of the DSL. The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability relating to their work with vulnerable adults or children.

6.3 Guidance about acceptable conduct will also be given to all staff during induction. These are sensible steps that every member of staff or volunteer should take in their daily professional contact with those in receipt of a service. All staff are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

6.4 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities. In order to achieve this we will ensure that:

- All staff members undertake appropriate safeguarding training based in their role.
- All staff members receive safeguarding updates (for example, via email, e-bulletins, staff meetings), as required to provide them with relevant skills and knowledge to safeguard adults and children effectively.

6.5 All regular visitors, temporary staff and volunteers will be given a set of our safeguarding procedures; they will be informed of whom our Senior Lead for Safeguarding and DSL are and what the recording and reporting system is.

6.6 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance.

6.7 Our Senior Lead for Safeguarding will also undertake appropriate training to ensure they are able to carry out their duty to safeguard vulnerable adults and children in line with the relevant local authority Safeguarding Children and Adults Board's procedures.

7. PROCEDURES FOR MANAGING PATHWAYS TO HELP AND SUPPORT

7.1 Adult Training Network adheres to safeguarding procedures that have been agreed locally with the relevant local authority Safeguarding Children and Adults Boards. Where we identify adults or children and families in need of support, we will carry out our responsibilities in accordance with the relevant local authority Safeguarding Children and Adults Board's procedures..

7.2 Every member of staff (including volunteers) working with children at Adult Training Network are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or adult, staff members should always act in the interests of that child or adult and have a responsibility to take action as outlined in this policy.

7.3 All staff members are encouraged to report and record any worries and concerns that they have and not see these as insignificant. On occasion, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, worries and concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on worries and concerns in accordance with this policy to build up a picture and access support for the adult or child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

7.4 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

7.5 The DSL should be used as a first point of contact for worries, concerns and queries regarding any safeguarding concerns at Adult Training Network. Any member of staff or visitor who receives a disclosure of abuse or suspects that a child or adult is at risk of harm must report it immediately to the DSL or, if unavailable, to the Senior Lead for Safeguarding.

7.6 All concerns about a child or adult should be reported without delay and recorded in writing using the agreed procedures.

7.7 Following receipt of any information raising concern, the DSL will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented.

7.8 The DSL will decide whether to make a referral to Adults or Children's Services when there are additional needs or safeguarding concerns that are not being addressed.

7.9 If a referral to Adults or Children's Services has not met the threshold for targeted support or statutory intervention the DSL will make a full written record of the decision and outcome.

7.10 If, at any point, there is a risk of immediate serious harm to an adult or child, a referral should be made to Children's Services or Adult's Services immediately. Where the risk is deemed to be imminent, it may be appropriate to contact the Police. Anybody can make a referral. If the child or adult's situation does not appear to be improving, the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Senior Lead for Safeguarding. Concerns should always lead to help for the child or adult at some point.

7.11 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, Adult's Services or the Police if:

> The situation is an emergency and the DSL and the Senior Lead for Safeguarding are all unavailable
> They are convinced that a direct report is the only way to ensure the child's safety.

7.12 Any member of staff who does not feel that concerns about an adult or child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Lead for Safeguarding. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Adult's Services or Children's Services directly with their concerns.

7.13 We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the relevant local authority Safeguarding Children Board threshold guidance will apply in respect of any child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to peer on peer abuse.

7.14 We recognise that children and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the individual's disability without further exploration.
- Children or adults with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

8. RECORDS AND INFORMATION SHARING

8.1 Any information recorded will be kept in a separate named file, in a secure cabinet or electronically.

8.2 If staff are concerned about the welfare or safety of any child or adult they will record their concern on the agreed reporting procedure. Any worries or concerns should be passed to the DSL without delay.

8.3 Any information recorded will be kept on the relevant adult's records. Adult safeguarding information will only be shared on the basis of 'need to know in the adult's interests' and on the understanding that it remains strictly confidential. The same applies to information relating to safeguarding for children. Consent should be sought when sharing any personal information relating to adults or children unless to do so may place them at additional risk of harm.

8.4 Adult or child safeguarding information will only be kept in the individual's records and this file will be kept up to date. Records of concern, copies of referrals, invitations and minutes of meetings and reports will also be stored here.

9. SAFER RECRUITMENT

9.1 At Adult Training Network we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service (DBS) checks where required to do so and use any other means of ensuring we are recruiting and selecting the most suitable people to work with patients and staff. All members of staff are required to disclose any criminal convictions to the Director annually in writing or are required to submit annual DBS disclosures.

9.2 We will maintain a record of all safer recruitment checks carried out in line with statutory requirements.

9.3 We will ensure that those responsible for recruiting staff have completed appropriate 'safer recruitment' training. At all times we will ensure that safer recruitment practices are followed in accordance with our statutory requirements.

9.4 For those staff/volunteers who have new or historical entries on their DBS that may raise concerns of a safeguarding nature but not exclude them from being able to undertake their role, a risk assessment will be completed and kept on file outlining any measures that will be in place to manage any assessed risk.

10. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

10.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for adults and children. We do, however, recognise that sometimes allegations of abuse are made.

10.2 We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are adults who deliberately seek to harm or abuse children or vulnerable adults.

10.3 We will take all possible steps to safeguard vulnerable adults or children and to ensure that the adults in our organisation are safe to work with those in receipt of our services.

10.4 With regards to allegations made against individuals that we believe to be working with children, we will always ensure that the procedures outlined by Working Together to Safeguard Children 2018 are adhered to and will seek appropriate advice from the Designated Officer for the relevant Local Authority (formerly known as LADO in previous versions of Working Together to Safeguard Children which this procedure will continue to use for ease of reference). For example, the LADO in Ealing can be contacted to request a consultation or to make a referral via e-mail: aap@ealing.gov.uk or by phone on 020 8825 8930.

10.5 If an allegation is made or information is received about any member of staff (or volunteer) who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children*

*In addition, staff should also alert the Senior Lead for Safeguarding if an individual who is working in London has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to directly relate to a child (see Chapter 7 of the London Child Protection Procedures for further guidance).

the member of staff receiving the information should inform the Senior Lead for Safeguarding immediately. This includes concerns relating to agency and supply staff and volunteers.

Should an allegation be made against the Senior Lead for Safeguarding, this will be reported to the most senior member of staff within the organisation unless this is not possible. In such cases where it is not possible, a consultation will be sought by that staff member with the LADO.

10.6 The Senior Lead for Safeguarding will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

10.7 Any member of staff or volunteer who does not feel confident to raise their concerns within the Organisation should contact the LADO directly on 020 8825 8930. Further national guidance can be found at: Advice on Whistleblowing.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – this line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

10.8 Adult Training Network has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our organisation, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

10.9 Where there are safeguarding concerns raised that relate to an allegation that a member of staff or volunteer poses a risk towards adults, a consultation will be sought with the Adults Safeguarding Lead within the Local Authority within one working day.

11. E SAFETY POLICY AIMS AND RISKS

11.1 The e-Safety, also known as 'online safety', policy has been written by the Adult Training Network (ATN). e-   Safety is part of the safeguarding 'duty of care', which is applicable to all working in education. The aims of ATN's e-Safety policy is to:
- Safeguard and protect all members of staff, learners and those who access the services provided by ATN
- Identify methods and approaches to take in order to educate and raise awareness of e-Safety throughout ATN
- Ensure all staff are working safely and responsibly online whilst also ensuring the use professional standards and practice when using online technology
- Identify the key steps to take when dealing with an e-Safety incident or e-Safety concerns

ATN identifies that there are numerous issues to consider in regards to e-Safety. These issues can be broadly categorised into three areas of risk:
- Content: exposure to illegal, inappropriate and/or harmful material
- Contact: being subjected to harmful online interaction with other users online
- Conduct: an individual's personal online behaviour that may increase the possibility of, or causes, harm

11.2 The key areas of risk that all staff, learners and those who access services provided by ATN must be made aware of include:
- Scams (fake emails, phishing or spoofing, etc.)
- Inappropriate contacts
- Harassment and bullying, including cyber bullying
- Masquerading and identity theft
- Inappropriate materials
- Sexting and 'revenge porn'
- Inappropriate use of social media (e.g. Facebook, Twitter)
- Illegal acts by users (e.g. copyright breach)
- Malicious software (e.g. viruses and downloads)

    The full e safety policy is to be found in Appendix 1

12 LINKS WITH OTHER POLICIES
This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below the additional policies in place that underpin our safeguarding practice:
- Equality Opportunities Policy
- Race Equality Policy

- Disability Statement
- IT Policy
- Anti-bullying and harassment policy
- Staff Code of Conduct
- Health & Safety Policy
- E Safety
- Prevent and British Values

13 Safeguarding officers at WLL

Designation	Name	Telephone	Email
Designated Safeguarding Lead	Joss New	07867 151502	joss.new@richmondandwandsworth.gov.uk
Designated Safeguarding Officer	Paul Brimecome	07989 223060	Paul.brimecome@richmondandwandsworth.gov.uk
Designated Safeguarding Officer	Santino Fragola	07767 256832	santino.fragola@richmondandwandsworth.gov.uk
Designated Safeguarding Officer	Phil Michel	07824 133379	phil.michael@richmondandwandsworth.gov.uk

Appendix 1

Adult Training Network (ATN)
E-Safety Policy and Processes

Contents

1. **Policy Aims**

The e-Safety, also known as 'online safety', policy has been written by the Adult Training Network (ATN). E-Safety is part of the safeguarding 'duty of care', which is applicable to all working in education. The aims of ATN's e-Safety policy is to:

- Safeguard and protect all members of staff, learners and those who access the services provided by ATN
- Identify methods and approaches to take in order to educate and raise awareness of e-Safety throughout ATN
- Ensure all staff are working safely and responsibly online whilst also ensuring the use professional standards and practice when using online technology
- Identify the key steps to take when dealing with an e-Safety incident or e-Safety concerns

ATN identifies that there are numerous issues to consider in regards to e-Safety. These issues can be broadly categorised into three areas of risk:

- Content: exposure to illegal, inappropriate and/or harmful material
- Contact: being subjected to harmful online interaction with other users online
- Conduct: an individual's personal online behaviour that may increase the possibility of, or causes, harm

The key areas of risk that all staff, learners and those who access services provided by ATN must be made aware of include:

- Scams (fake emails, phishing or spoofing, etc.)
- Inappropriate contacts
- Harassment and bullying, including cyber bullying
- Masquerading and identity theft
- Inappropriate materials
- Sexting and 'revenge porn'
- Inappropriate use of social media (e.g. Facebook, Twitter)
- Illegal acts by users (e.g. copyright breach)
- Malicious software (e.g. viruses and downloads)

2. **Policy Scope:**

- ATN believes that e-Safety and staying safe online is a crucial part of our safeguarding duty and it acknowledges the responsibility we have to ensure all staff, learners and those who access the services provided by ATN are protected from the risk of harm online.
- ATN understands and identifies that the use of the internet and other technological devices, such as computers, laptops, tablets, mobile phones and game consoles play a part in the everyday lives of staff, learners and those who access the services provided by ATN.
- ATN believes that all staff, learners and those who access the services provided by ATN should be empowered to gain an understanding of online risks and to develop strategies to manage and respond to these risks.
- ATN's e-Safety policy applies to all staff, learners and those who access the services provided by ATN. The e-Safety policy applies to all access to the internet and the use of technology, including the personal devices issued to ATN staff for use off-site such as work mobile phones.

2.1 Links with other policies and guidelines

ATN's e-Safety policy links with several other policies and guidelines that have been put into place including:
- Safeguarding policy (which incorporates the Prevent Policy of ATN)
- Guidelines for Acceptable Computer Use for Learners

3. Role and Responsibilities

ATN has appointed Sarjeet Singh Gill, as the Designated e-Safety lead. The e-Safety Lead should be immediately contacted for support regarding e-Safety or in the event of an e-Safety incident. If the e-Safety Lead is absent or is unable to perform their duties, then the Deputy e-Safety Lead should be contacted.

Name	Designation	Email Address	Telephone Number
Sarjeet Singh Gill	e-Safety Lead	sgill@adult-training.org.uk	020 8574 9588
Kamaljit Kaur	Deputy e-Safety Lead	kamaljit@adult-training.org.uk	020 8574 9588

3.1 The e-Safety Lead will:
- Annually review the e-Safety policy to ensure it is updated to follow any national or local policy requirements, any previous e-Safety concerns that were identified or any changes to the technical infrastructure
- Maintain records of e-Safety concerns and the actions that were taken
- Ensure that e-Safety and online safety is identified as a safeguarding issue and that practice complies with national and local recommendations and requirements
- Ensure that there is an updated guideline for computer use of learners
- Work with IT staff to monitor the safety and security of computer systems in place and that there is an appropriate filtering and monitoring system in place to ensure online safety
- Ensure that there is a robust reporting system in place for individuals to report any concerns regarding online safety
- Ensure that appropriate risk assessments are undertaken regarding the safe use of the internet and technology, such as computers, laptops, telephones and mobile phones.

3.2 All staff members will:

- Read and adhere to the e-Safety policy
- Contribute to the implementation of the e-Safety policy and the guidelines for computer use of learners
- Be a role model when using the internet and technology and maintain a sense of professionalism when using the internet and technology both on and off- site
- Know when and how to escalate e-Safety issues, including signposting to appropriate support
- Identify any e-Safety concerns and immediately inform the e-Safety Lead

3.3 All learners will:

- Read and adhere to the e-Safety policy and ATN's Guidelines for Acceptable Computer Use for Learners
- Take responsibility for keeping themselves and their peers safe online
- Contribute to the development of the e-Safety policy
- Seek help and support from a tutor, staff member of the e-Safety lead if there is a concern online, or if they are concerned about the online safety of others
- Respect the feelings and rights of others both on and offline

3.4 Training:

- ATN will provide and discuss the e-Safety policy with all members of staff, learners and those who access the services provided by ATN.
- ATN will provide updated and appropriate e-Safety training for staff members, learners and those who access the services provided by ATN with at least annual updates
- ATN will ensure staff, learners and those who access the services provided by ATN are reminded to behave professionally and in compliance with ATN's policies when accessing ATN's systems and devices
- ATN will highlight useful educational resources and website links which tutors should use, according to the ability of their learners

- ATN will ensure all members of staff are made aware of the procedures to adhere to regarding e-Safety concerns which affect learns, colleagues and those who access the services provided by ATN.

4. Reducing the Risks Online:

ATN recognises that the internet is a constantly changing environment with new apps, devices, websites and materials emerging constantly. Due to this, there is also an increase in the risks found online. ATN will:
- Regularly review the approaches in place which identify, assess and minimise online risks
- Examine new technologies for educational use and undertake appropriate risk assessments before ATN permits the use of it
- Ensure that appropriate filtering and monitoring systems are in place and take the necessary approaches to ensure that staff, learners and those who access the services provided by ATN can only access appropriate material
- Due to the global nature of the internet, it is not possible to guarantee that unsuitable and inappropriate material cannot be accessed via devices in the property of ATN

All members of ATN staff, learners and those that access the services provided by ATN are made aware of ATN's expectations regarding safe and appropriate online behaviour and the importance of not posting, sharing or spreading any content, comments, images or videos which could cause harm, distress or offence to other individuals.

5. Safer Use of Technology

5.1 Classroom Use

ATN uses a wide range of technology. This includes access to:
- Computers, laptops and other digital devices
- Internet which includes search engines
- Email

- All ATN owned devices will be used in accordance with the Guidelines for Acceptable Computer Use for Learners and with appropriate safety measures in place.
- Staff members will always evaluate websites, online tools and apps fully before using them in the classroom or recommending them to learners for use at home.
- ATN will ensure that the use of all internet-derived materials, by staff and learners, adheres to copyright law and acknowledges the source of information.
- All learners will read the Guidelines for Acceptable Computer Use for Learners and agree to its terms before being given access to ATN's computer system, IT resources or internet.

5.2 Security and Management of Information Systems

ATN will take appropriate steps to ensure the security of our information systems, including:
- Virus protection being updated regularly
- Not downloading unapproved software to ATN's devices or opening unfamiliar email attachments
- Regularly checking files held on ATN's network
- The appropriate use of user logins and passwords to access ATN's network.
- All users should log off or lock their screens/devices if they leave the system unattended
- For further information, contact the e-Safety Lead or ATN's Network Engineer

5.2.1 Password Policy

- All members of staff will have their own username and private password to access ATN's systems; staff are solely responsible for keeping their login information safe and should not share it with others

5.2.2 Managing Personal Data Online

- Personal data will be recorded, processed, transferred, and made available online in accordance with the General Data Protection Regulation (GDPR) 2018.

5.3 Managing the Safety of the ATN Website

- ATN will ensure that our website complies with guidelines for publications including: accessibility; data protection; privacy policies and copyright
- The personal information of staff will not be published on our website; the only contact details found on the website will be the addresses of ATN offices, the telephone numbers and company emails
- The administrator account for the ATN website will be secured with a strong password
- ATN will post appropriate information about safeguarding, including the contact details for the Designated Safeguarding Team.

5.4 Managing Email

- Access to ATN email systems will always take place in accordance with GDPR legislation and in line with other ATN policies, such as Code of Conduct and Confidentiality
- It is not permitted to forward any chain/spam emails. All spam and junk emails will be blocked and will be reported to the e-Safety Lead.
- All electronic communication that contains sensitive or personal information will only be sent using secure and encrypted email
- ATN email addresses and other official contact details are not permitted to be used for setting up personal social media accounts
- ATN staff, learners and those who access the services provided by ATN will immediately inform the e-Safety Lead if they receive any offensive electronic communication, and this will be recorded by the e-Safety Lead

5.4.1 Staff

- Using personal email addresses by staff for any official ATN business is prohibited. All staff members are provided with an ATN company email address and this should be used for all official communication
- Staff are encouraged to have an appropriate work life balance when responding to email, especially if the electronic communication is taking place between staff, learners and those who access services provided by ATN

5.4.2 Learners

- Learners may access their personal email accounts on computers provided by ATN. However, this is only permitted out of class hours and learners must sign out of their accounts completely

6. Social Media

6.1 Expectations

- ATN expects all staff, learners and those who access services provided by ATN to be safe and responsible when using social media
- 'Social media' refers to (but is not limited to): blogs, wikis, social networking sites, forums, online gaming, apps, video/photo sharing sites, chatrooms and instant messenger sites/ apps.
- ATN advises all staff, learners and those who access services provided by ATN to not publish specific and detailed private thoughts, pictures, videos or messages on any social media platforms. Specifically, content that may be considered threatening, harmful and offence to other individuals.
- If staff, learners or those who access services provided by ATN become concerned regarding the online conduct and behaviour of any individual connected to ATN, then they should raise this concern with the e-Safety Lead.

6.2 Staff Personal Use of Social Media

- The e-Safety Lead will discuss with all members of staff the safe and responsible use of social networking and social media as part of staff induction and will be revisited during staff training sessions
- ATN staff will be reminded that their online behaviour and conduct will have an impact of their reputation within ATN.
- ATN staff will be reminded that the personal messages, photos and videos they post online do not reflect the views of ATN
- All members of staff should safeguard themselves and their privacy when using social media platforms. Staff members are advised to:
    o Setting the privacy levels of their personal sites as strictly as they can
    o Be aware of location sharing services
    o Opt out of public listings when using social networking sites
    o Logging out completely of all accounts after use
    o Keeping passwords safe and change them regularly
- Staff members are advised and encouraged to not identify themselves as ATN employees on their personal social networking accounts. This is to prevent the information found on these sites from being linked to ATN and to safeguard the privacy of other staff members, learners and those who access the services provided by ATN.
- Staff members are encouraged to consider the information they share and post online. Staff should ensure that they do not post any harmful, offensive, intimidating or illegal material.
- Staff members should notify the e-Safety Lead immediately if they become aware of any content that has been shared online that poses a risk to the safeguarding of other staff, learners and those who access the services provided by ATN.

6.3 Learner Personal Use of Social Media

- Learners will be made advised on how to use social media safely and appropriately. They should refer to the Guidelines for Acceptable Computer Use for Learners for more information.
- Learners will be advised to:

- o Consider the benefits and risks of sharing personal details on social media sites which could identify who they are and their location. This includes full name, address, contact numbers, schools attended, place of work, specific interests, clubs attended, email addresses and other social media contact details
- o Only accept and invite known friends and family on social media sites and to protect their online profiles by making their accounts private or only accessible to people they know
- o Never meet anyone they meet online, especially in a private setting
- o Use safe passwords that are not shared with anyone else
- o Think about what messages, photos and videos they share online and ensure that they do not post or share any harmful, offensive, intimidating or illegal material
- o Block and report unwanted communications and notify the e-Safety Lead if they become concerned about what they have seen or received on social media sites

6.4 Official ATN Use of Social Media

- The official ATN social media channels are:
  - o https://www.facebook.com/Adult-Training-Network-1655397611400772/
  - o https://twitter.com/letchworthatn
- The official use of ATN social media channels only takes place with clear promotion or community engagement objectives
- Official ATN social media use will be conducted in line with existing policies, including; Safeguarding, Data Protection and Confidentiality
- The e-Safety Lead will ensure that access to ATN's official social media channels are limited to staff members who are designated the job of updating the social media channels. These staff members must not share the login details unless permitted by the e-Safety Lead.

7. Use of Personal Devices and Mobile Phones

- ATN recognises that personal communication via mobile technologies is an accepted and expected part of everyday life for staff, learners and those who access the services provided by ATN. However, these mobile technologies must be used safely and appropriately within ATN sites.
- All use of personal devices and mobile phones will take place in compliance with the law and other appropriate ATN polices, including, but not limited to: Anti- Bullying, Safeguarding and Data Protection
- Electronic devices that are bought onto site are the responsibility of the user at all times.
- Sending abusive or inappropriate messages/content via personal and mobile devices is forbidden by any staff member, learner and those who access the services provided by ATN. Any breaches of this will be dealt with by the e-Safety Lead.

7.1 Staff Use of Personal Devices and Mobile Phones

- Staff members will ensure that the use of personal devices and mobile phones will take place in accordance with the law and other appropriate ATN polices, including, but not limited to: Anti- Bullying, Safeguarding and Data Protection
- Staff members will be advised to keep their personal and mobile devices safe and secure at all times and not use these devices during lesson times.
- Staff members will not use personal devices, such as: mobile phones, tablets or cameras, to take photos or videos or learners without their expressed consent first. These photos or videos must only be used for official ATN purposes and never for personal use.
- If a member of staff breaches the e-Safety policy, action will be taken by the e-Safety Lead who will also record the incident.

7.2 Learner Use of Personal Devices and Mobile Phones

- Learners will be educated regarding the safe and appropriate use of personal devices and mobile phones. They will be made aware of boundaries and consequences of inappropriate use.
- ATN expects learners personal devices and mobile phones to not be used during lesson times
- Mobile phones and personal devices must not be used and should be concealed during examinations
- Learners will be advised to keep their personal and mobile devices safe and secure. ATN is not responsible for any loss or damage to personal and mobile devices, as the learner is held responsible for these items.

7.3 Visitors' Use of Personal Devices and Mobile Phones

- All visitors to ATN must use their personal devices and mobile phones in accordance with the law and other appropriate ATN polices, including, but not limited to: Anti- Bullying, Safeguarding and Data Protection
- All visitors are responsible for their own personal and mobile devices, as ATN is not responsible for any loss or damage to these items.

7.4 Officially provided mobile phones and devices

- Some staff members may be issued with a work phone and phone number. This must be kept safe and secure by the staff member at all times
- The usage of work phones will always be used in accordance with the law and other appropriate ATN policies, including, but not limited to: Anti- Bullying, Safeguarding and Data Protection

8. Responding to e-Safety Incidents and Concerns

- All ATN staff, learners and those who access the services provided by ATN will be made aware of the reporting procedure for e-Safety concerns, including: breaches of filtering, sexting, cyberbullying, fraud, downloading and using malicious software, masquerading and identity theft, illegal and inappropriate content.
- ATN requires staff, learners and those who access the services provided by ATN to work collectively to resolve e-Safety issues and concerns
- All ATN staff, learners and those who access the services provided by ATN must respect confidentiality and the need to correctly follow the ATN procedure for reporting concerns. All concerns regarding e-Safety must be reported to the e-Safety Lead.
- If there is suspicion that illegal activity has taken place, the e-Safety Lead will be immediately contacted or the Police will be called using 101, or 999 if there is an immediate danger or risk of harm

8.1 Concerns about Welfare of Learners

- The e-Safety Lead will be informed about e-Safety incidents involving safeguarding concerns. The Designated Safeguarding Team may also be informed.

Designation	Name	Telephone	Email
Managing Director of ATN and Safeguarding Lead	Sarjeet Singh Gill	02085749588	sgill@adult-training.org.uk
Regional Manager West London, Deputy Safeguarding Lead for London and North Hertfordshire	Kamaljit Kaur	02085749588	kamaljit@adult-training.org.uk

- The e-Safety Lead will ensure that e-Safety concerns are appropriately dealt with and reported to the relevant agencies in line with the Safeguarding Vulnerable Adults procedures.

8.2 Staff Misuse

- Any complaint about staff misuse will be referred to the e-Safety Lead
- Any allegations regarding staff misuse or the online conduct of staff may result in an internal investigation
- Appropriate action will be taken in accordance with the policies of ATN

9. Procedures for Responding to Specific Online Incidents or Concerns

9.1 Dealing with 'Sexting' and 'Revenge Porn'

- If ATN becomes aware of an incident regarding the creation or distribution of sexual imagery, ATN will:
  - Act in accordance with our Safeguarding policy
  - Immediately notify the Designated Safeguarding Lead
  - Carry out a risk assessment which considers the vulnerability of individual(s) involved
  - Make a referral to the Police if appropriate- when Section 33 of the Criminal Justice and Courts Act 2015 has been infringed
  - Provide necessary safeguards and support for the victim(s) involved, such as counselling or pastoral support
  - Implement appropriate sanctions in accordance with ATN's policies, but ensuring not to further traumatise the victim if possible
  - ATN will not view any sexual images that have been shared without consent, unless there is no other possible option, or there is a clear reason to do so. In this case, the image will only be viewed by the Designated Safeguarding Lead and the justification for viewing the image will be clearly documented.

9.2 Online Sexual Abuse and Exploitation

- ATN will ensure that all staff, learners and those who access the services provided by ATN are aware of online sexual abuse, including: exploitation and grooming; the consequences, the approaches that may be used by offenders and how to respond to concerns.
- ATN recognises online sexual abuse as a safeguarding issue and, as such, all concerns will be reported to the Designated Safeguarding Lead, who will respond accordingly.
- ATN will ensure that all staff, learners and those who access the services provided by ATN are made aware of the support available regarding online sexual abuse and exploitation.

9.3 Cyberbullying

- Cyberbullying, and other forms of bullying, will not be tolerated by ATN
- Full details on how ATN responds to cyberbullying are set out in the Safeguarding Policy - http://www.adult-training.org.uk/policies.html

9.4 Online Hate

- Online hate content, directed towards or posted by, ATN staff, learners or those who access the services provided by ATN will not be tolerated at ATN and will be responded to in line with existing ATN policies
- ATN staff, learners and those who access the services provided by ATN are advised to report online hate to the e-Safety Lead
- The Police will be contacted if a criminal offence is suspected and the Designated Safeguarding Lead will also be contacted

9.5 Online Radicalisation and Extremism

- ATN will take all reasonable precautions to ensure that all staff, learners and those who access the services provided by ATN are safe from terrorist and extremist material when accessing the internet on ATN premises. Full details are found in the ATN Safeguarding Policy, which incorporates ATN's Prevent Policy.
- If ATN becomes concerned about an individual who may be at risk of radicalisation online, the Designated Safeguarding Lead will be notified immediately and action will be taken in line with the Safeguarding Policy.

10. Useful e-Safety Links

https://safety.lovetoknow.com/Internet_Safety_Adult

http://www.bbc.co.uk/webwise

https://www.getsafeonline.org/protecting-yourself/

https://www.gov.uk/guidance/think-before-you-share

https://www.ageuk.org.uk/information-advice/work-learning/technology-internet/internet-security/

https://safe.met.police.uk/internet_safety/get_the_facts.html

https://safestars.org/internet-safety/

https://www.saferinternet.org.uk/

www.actionfraud.police.uk

Prevent & British Values Policy of the Adult Training Network

Prevent

Prevent is one of four work strands which make up the government's counter-terrorism strategy – CONTEST. The aim of CONTEST is to reduce the risk to the UK and its interests overseas from terrorism. Prevent operates in the 'pre-criminal space'. It is about supporting individuals who are at risk of radicalisation away from becoming terrorists, or supporting terrorism.

Pursue – focuses on detecting, investigating and disrupting terrorist threats to the UK and our interests overseas.

Protect – aims to reduce the vulnerability of the UK and UK interests overseas to terrorist attack. This includes aviation security for both cargo and passengers.

Prepare – aims to minimise the impact of any attack, manage any incidence of an ongoing attack and recover quickly and effectively

Prevent – aims to stop people becoming terrorists or supporting terrorism

As the preventative strand of CONTEST, ATN will support Prevent to:-

- Respond to the ideological challenge of terrorism and the threat faced by the UK from those who promote it

- Prevent learners, users and staff from being drawn into terrorism and ensure they are given appropriate advice and support as appropriate.

- Work with a wide range of sectors (including education, criminal justice, faith, charities, the internet and health) where there are risks of radicalization which need to be addressed

- Ensure that there is an effective framework for managing speaker requests.

- Ensure that this policy is well communicated to staff/students and complied with

- Ensure that there a policy/framework for managing on site events i.e. charity events.
- Ensure that any off site events which are supported, endorsed, funded or organized through the institution are subject to the same policy/framework.

- Ensure that ATN employs filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material including restrictions on the use of using their own devices via Wi-Fi.

- Ensure that all staff have sufficient knowledge and confidence to exemplify British Values in their management, teaching and through general behaviors in the institution and understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimize terrorism.

- Ensure that all staff have sufficient training to be able to recognize this vulnerability and be aware of what action to take in response.

- Ensure that there are adequate arrangements and resources in place to provide pastoral care and support as required.

- Ensure that there are adequate monitoring arrangements to ensure that this support is effective and reflects the ATN's safeguarding and equality policies.

British Values

As part of the Prevent strategy ATN is promoting Fundamental British Values to reflect life in modern Britain.

These values are Democracy, Rule of Law, Respect and Tolerance, Individual Liberty.

Fundamental British Values underpin what it is to be a citizen in a modern and diverse Great Britain valuing our community and celebrating diversity of the UK.
Fundamental British Values are not exclusive to being British and are shared by other democratic countries as a way of creating an orderly society, where individual members can feel safe, valued and can contribute for the good of themselves and others.

These will mirror the principles and values of Total People and all the work areas that we support. These will occur throughout your programme and will be promoted by the staff with whom you come into contact.

Democracy
A culture built upon freedom and equality, where everyone is aware of their rights and responsibilities.
> **Examples**
> - Leadership and accountability
> - Joint decision making
> - Team meetings
> - The right to protest and petition
> - Receiving and giving feedback

Rule of Law
The need for rules to make a happy, safe and secure environment to live and work.
> **Examples**
> - Legislation
> - Agreed ways of working, policies and procedures
> - How the law protects you and others
> - Codes of conduct

Respect and Tolerance
Understanding that we all do not share the same beliefs and values. Respecting the values, ideas and beliefs of others whilst not imposing our own others.
> **Examples**
> - Embracing diversity

- The importance of religion, traditions, cultural heritage and preferences
- Tackling stereotyping, labeling, prejudice and discrimination

Individual Liberty

Protection of your rights and the right of others you work with.

Examples

- Equality and Human Rights
- Personal Development
- Respect and Dignity
- Rights, choice, consent and individuality
- Values and principles

Name: Sarjeet Singh Gill

Designation: Managing Director

Date reviewed : 28/1/21

Date of next review: 28/1/22