

Critical Contacts

The Deputy Head of Adult Learning has overall responsibility for Safeguarding and is the Service's Designated Safeguarding Lead.

Anyone who has a concern about a learner should contact the **DSL (ANNA RITCHIE)** immediately on **07423502592**

Designated Safeguarding Lead: Anna Ritchie, **07423502592**

Deputy Designated Safeguarding Lead: Angela Eusebe, **07778712470**

In the evenings and on Saturdays, contact **Duty Manager (contact number obtained from reception)**.

If a person is in immediate danger, do not wait, call 999.

Adult Social Care at Waltham Forest Council: What to do if you are worried about a vulnerable adult

If you have urgent concerns that you or someone you know is being abused or neglected, contact the **Safeguarding Adults Team** at Waltham Forest Direct:

- Safeguarding Adults Team: Call 020 8496 3000 at any time
- Send an email to WFDLiaison@walthamforest.gov.uk

Child protection at Waltham Forest Council:

- **Members of the public and professionals**

If you don't believe the risk requires immediate action, contact the Multi-Agency Safeguarding Hub (MASH) to discuss your concerns with a social worker.

Call 020 8496 3000 or email MASHrequests@walthamforest.gov.uk

The MASH social worker will aim to get as much information as possible about the child and the family. You can remain anonymous if you wish.

- **Concerns about someone working with children**

The Local Authority Designated Officer (LADO) is involved when there are concerns about an adult working or volunteering with children.

[Report concerns](#) about a professional or volunteer working with children to LADO.

Safeguarding & Prevent Policy 2026-27

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SAFEGUARDING & PREVENT POLICY 2026–27

Waltham Forest Adult Learning Service

1. Policy Statement

Waltham Forest Adult Learning Service is committed to safeguarding and promoting the welfare of all learners, including:

- Adults aged 19+
- Adults at risk as defined by the Care Act 2014
- Children or young parents who attend Family Learning sessions
- Adults with learning difficulties or disabilities (LDD) who may be at heightened risk

While most of our provision is for adults aged 19+, our safeguarding duties extend equally to children and adults at risk, particularly those participating in Family Learning or have an identified LDD.

The Service complies fully with:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- Care Act 2014 (Adult Safeguarding)
- Ofsted Education Inspection Framework (EIF) 2025 (Nov)
- Prevent Duty Guidance (Revised)

Safeguarding is everyone's responsibility.

2. Introduction and Scope

Introduction

Waltham Forest Adult Learning Service is committed to providing a safe, respectful and inclusive environment for every learner who engages with our provision. Although the vast majority of our learners are adults aged 19 and over, our responsibility extends equally to the children who participate in our Family Learning programmes and to the adults with learning difficulties or disabilities who may be at heightened risk of harm. Safeguarding is therefore an essential and non-negotiable part of our culture, our curriculum and our everyday practice.

Our learners come from diverse backgrounds and bring with them a wide range of experiences, strengths and vulnerabilities. Many adults access our programmes to build confidence, improve wellbeing, re-enter learning, or develop new skills, while children join our Family Learning sessions to learn alongside their parents or carers in a safe, supportive environment. Some adults may also have additional needs that increase their exposure to risk. For this reason, our safeguarding approach

recognises the different legal duties that apply to children, adults and adults at risk, and ensures that each group receives appropriate protection.

This policy sets out how we meet our statutory responsibilities under the Care Act 2014, the Children Act, Working Together to Safeguard Children, Keeping Children Safe in Education, the Prevent Duty and related legislation. It describes the systems, processes and behaviours that enable us to protect our learners from abuse, neglect, exploitation, radicalisation and all other forms of harm. It also outlines the responsibilities of staff, volunteers, partners and leaders who work with us, and it establishes clear and transparent pathways for reporting and responding to concerns.

Safeguarding within an adult learning environment requires sensitivity, vigilance and professional curiosity. It involves recognising that harm can occur anywhere, including online and within family or community settings, and it requires staff to notice the small signs that may indicate a learner is struggling or unsafe. Our commitment extends beyond responding to incidents; it includes creating a culture of safety, embedding safeguarding themes within our teaching, building strong relationships with external agencies, and empowering learners to understand risk, make safe choices and seek help when needed.

Through this policy, we affirm that the welfare of all learners—adult or child, independent or requiring additional support—remains our highest priority. Safeguarding is a shared responsibility, and together we strive to ensure that every learner who enters our service feels safe, valued and protected.

Scope

This policy applies to:

- Employees
- Volunteers
- Governors, visitors and contractors
- Partner/commissioned organisations
- All learners (children, adults, adults at risk)
- Family members participating in Family Learning

The policy includes annexes specifically for Family Learning and those working with adults with LDD, recognising the distinct safeguarding implications in these settings.

3. Definitions

3.1 Adults (19+)

The vast majority of our learners fall into this category. However, adults may still be vulnerable due to mental health, disability, homelessness, domestic abuse, poverty, or exploitation.

3.2 Adult at Risk

Defined by the Care Act 2014: a person with care and support needs who may be unable to protect themselves from harm.

3.3 Children

Anyone under 18.

3.4 Child Protection

Protecting children from abuse, neglect, exploitation and promoting their welfare.

3.5 Abuse Types

We have a duty to be vigilant and look for signs of abuse to protect our learners. These are the different types of abuse that we are trained to look out for, but understand that this list is not exhaustive:

- Bullying
- Child Criminal Exploitation (CCE)*
- Child Sexual Exploitation (CSE)*
- Coercive Control
- Crime and fear of crime
- Criminal Exploitation (County Lines)*
- Cuckooing
- Cyber bullying
- Discriminatory abuse
- Domestic abuse*
- Emotional
- Female Genital Mutilation (FGM), including breast ironing: All staff must be aware of the mandatory duty to report to police any case where an act of FGM appears to have been carried out or about to be carried out on a girl under the age of 18.
- Fabricated or induced illness
- Factitious disorder imposed on another
- Financial abuse
- Forced marriage
- Gaslighting
- Homelessness highlighted as vulnerability
- Honour-based abuse (HBA)*
- Inappropriate supervision by staff i.e. bad practice
- Institutional or organisational abuse
- Modern slavery
- Neglect

- Online abuse
- Peer on peer abuse
- Physical abuse
- Psychological/Emotional abuse
- Radicalisation and extremism
- Self-harm
- Self-neglect
- Sexual abuse (including peer-on-peer and via digital devices)
- Sexual exploitation
- Sexual harassment
- Victimisation due to race, sexuality, faith, age, gender, disability.

* The concerns outlined above can sometimes indicate, or lead into, more complex safeguarding risks. The following explains the types of exploitation and abuse that staff may encounter in greater depth.

Criminal Exploitation (County Lines)

Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks groom and exploit vulnerable people (including children and young people) to sell drugs. Often these people are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs. We have a duty to be vigilant and look for the signs of criminal exploitation in order to protect our learners. Useful videos to support your understanding of County Lines can be found at:

- <https://www.youtube.com/watch?v=3ILaguFXHr4&t=103s>
- <https://www.educare.co.uk/news/what-is-county-lines>

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation (CSE)

CSE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been sexually exploited even if the activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

Domestic abuse

The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

Honour-based abuse (HBA)

So-called ‘honour-based’ abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

3.6 Low-Level Concern

A low level concern is any behaviour by a member of staff that falls short of our expected professional standards but does not meet the threshold of a safeguarding allegation. It may be a small lapse in judgement, a minor breach of the Staff Code of Conduct, or any action that causes a sense of unease about a colleague’s behaviour. These concerns must still be reported, as they help us identify patterns early, promote a culture of openness, and ensure that boundaries remain clear and consistently upheld.

3.7 Prevent

Prevent is part of our wider safeguarding responsibility and focuses on protecting learners from being drawn into extremism or radicalisation. Within adult learning, this includes recognising when vulnerable adults, adults at risk, or parents/carers attending Family Learning may be exposed to harmful ideologies, misinformation, extremist narratives or online grooming. The Prevent duty requires staff to remain professionally curious, identify early signs of radicalisation, challenge extremist viewpoints appropriately, and report concerns promptly to the Designated Safeguarding Lead. Prevent is not about restricting debate, but about creating safe learning spaces where sensitive or controversial issues can be explored safely, respectfully and without risk.

4. Roles & Responsibilities

Safeguarding is a shared responsibility that relies on every individual within Waltham Forest Adult Learning Service playing an active role in promoting the safety and wellbeing of our learners. Although most of our provision supports adults aged 19 and over, our duty extends to the children who attend Family Learning sessions and to adults with learning difficulties or disabilities who may be at increased risk of harm. Effective safeguarding depends on clear lines of accountability, consistent professional behaviour, and a culture where concerns are recognised, reported and acted upon without delay. This

section outlines the specific responsibilities of leaders, managers, designated safeguarding personnel, partners and all staff to ensure that safeguarding remains central to our practice and that every learner, regardless of age or need, is protected from harm.

4.1 Governing Body

- Ensures compliance with all statutory requirements
- Oversees safeguarding arrangements for adults AND children
- Receives termly safeguarding reports.

4.2 Senior Leadership Team

- Ensures the Service meets the Ofsted “Met” safeguarding threshold
- Ensures suitable arrangements for Family Learning environments
- Oversees safeguarding systems from an Operational perspective.

4.3 Designated Safeguarding Lead (DSL) and Deputy Safeguarding Lead (DDSL)

Our DSL:

- Manages referrals (LADO, MASH, Adult Social Care, Channel)
- Maintains secure safeguarding records
- Provides staff training
- Ensures appropriate safeguarding processes for Family Learning
- Supports staff handling disclosures.

4.4 All Staff

- Must remain vigilant
- Must report all concerns immediately
- Must follow Lone Working and Family Learning procedures
- Must understand differences between child protection and adult safeguarding.

5. Safer Recruitment

Waltham Forest Adult Learning Service is committed to recruiting staff and volunteers who are safe, suitable, and able to uphold the highest standards of professional conduct. As part of Waltham Forest Council, the Service follows the Council’s Safer Recruitment and DBS Policies, ensuring that all recruitment activity meets the required procedures, statutory guidance, and safer practice expectations. These policies outline the mandatory steps needed to verify an applicant’s identity, qualifications, employment history, suitability to work with vulnerable groups, and their overall fitness for the role.

Because our provision includes adults aged 19 and over, adults who may be at risk, and children who participate in Family Learning sessions, we apply safer recruitment practices rigorously and

consistently across all roles, whether paid, voluntary, or contracted through partner organisations. Every individual who works or volunteers with us must be appropriately vetted to ensure they can contribute to a safe and protective learning environment.

Safer recruitment is not a one off event but an ongoing safeguarding measure. Staff are expected to maintain high professional standards at all times, and any concerns regarding conduct, suitability, or boundary keeping will be addressed through the Staff Code of Conduct, the lowlevel concerns procedures, or formal safeguarding and disciplinary pathways as appropriate.

6. Staff Code of Conduct

This Code of Conduct sets out the standards of behaviour expected from everyone working on behalf of Waltham Forest Adult Learning Service. It applies to all employees, sessional lecturers, volunteers, apprentices, governors, contractors, agency staff and partner delivered staff, whether working on Adult Learning Service sites, online, or in the community. The purpose of the Code is to ensure that all learners—adults, adults at risk, children attending Family Learning, and learners with learning difficulties or disabilities—are treated with dignity, respect and professionalism at all times. It provides clear guidance on maintaining safe boundaries, communicating appropriately, protecting learners from harm, and upholding the values and reputation of ALS.

Staff must read this section alongside the wider Safeguarding and Prevent Policy, the Data Protection Policy, the Acceptable Use/Online Safety Policy, Whistleblowing Policy and relevant HR policies. Adherence to the Code is a core part of safeguarding practice and a requirement of working within ALS.

ALS expects all staff to act as positive role models, uphold the highest standards of professional conduct, maintain appropriate boundaries, and immediately report any behaviour—by learners, colleagues, parents, visitors or partners—that may pose a safeguarding risk. Staff must recognise the distinct needs and vulnerabilities of adult learners, adults at risk, children present in Family Learning, and LDD learners, and adapt their conduct accordingly. This Code supports a safe, respectful and inclusive learning environment and helps ensure that safeguarding remains integral to everything we do.

Expectations for Staff Conduct

Core Standards

- Place the welfare, safety and dignity of all learners—adult or child—at the centre of your decisions and actions.
- Model professional behaviour at all times, including online and when representing ALS in the community.
- Maintain clear professional boundaries and avoid behaviour that could be misinterpreted.
- Report safeguarding concerns immediately to the DSL and do not attempt to investigate.
- Respect confidentiality and share information only when necessary and appropriate.
- Actively challenge discriminatory behaviour or language and promote equality and inclusion.

Professional Boundaries & Relationships

- Do not pursue personal or romantic relationships with learners; even where adults consent, the power imbalance makes such relationships unacceptable.
- Do not accept gifts, loans or favours from learners without declaration and approval.
- Avoid dual relationships (e.g., friendship, financial involvement, counselling).
- Disclose any unavoidable conflicts of interest to your manager and the DSL.

Communication & Digital Conduct (including AI)

- Use only ALS communication channels (email, phone, approved platforms) for contacting learners.
- Do not use personal email addresses, personal phone numbers, or personal social media to communicate with learners.
- Use messaging apps only when formally approved, with clear expectations and record-keeping.
- Keep all communication professional, factual and necessary.
- Do not create or share misinformation, unverified content or inappropriate material.
- Use AI tools only with prior approval and never input personal or sensitive data.

Social Media & Public Representation

- Maintain strict privacy settings on personal accounts and do not connect with learners online.
- Do not post images or references to learners or ALS activities on personal accounts.
- Direct any press or media enquiries to the Communications Lead.

One-to-One Work, Meetings & Lone Working

- Conduct 1:1 sessions in visible spaces, with open doors or observation panels where possible.
- Inform a manager or colleague of lone-working arrangements, including whereabouts and expected finish time.
- Do not hold sessions in your home or a private dwelling.
- For home visits, complete the required risk assessment and follow all safety procedures.

Physical Contact & Behaviour Management

- Avoid physical contact unless required to prevent immediate harm or when part of a planned, risk-assessed learning activity.
- Use de-escalation, restorative practice and calm communication.
- Never use humiliation, sarcasm, threats or discriminatory language.

Family Learning: Conduct When Children Are Present

- Parents remain responsible for supervising children unless WFALS has explicitly taken on supervision.
- Staff must not take children to the toilet or provide personal care.
- Intervene only to prevent immediate harm, then return responsibility to the parent or carer.
- Ensure language, materials and behaviour are child appropriate.

- Report concerns about parenting capacity, domestic abuse or child welfare immediately.
- Do not photograph or record children without full written consent and approved WFALS devices.

Online Teaching & Remote Sessions

- Use only approved digital platforms and ensure safety settings are active.
- Present professionally and use neutral or agreed WFALS backgrounds.
- Record sessions only when authorised and in line with privacy requirements.
- Challenge and report online bullying, sexualised behaviour or extremist content.

Transport, Visits & External Speakers

- Do not transport learners in personal vehicles unless in an emergency and with approval.
- Follow all WFALS risk assessments and consent procedures for trips and visits.
- Ensure external speakers undergo appropriate checks and pre-event approval.

Confidentiality, Data Protection & Record-Keeping

- Share information lawfully, proportionately and on a need-to-know basis.
- Keep safeguarding notes secure, accurate and timely; do not keep personal copies.
- Protect digital devices and report data breaches immediately.

Recognising & Reporting Concerns

- Report any concern—about a child, adult, colleague or visitor—to the DSL immediately.
- Use the appropriate referral pathway for adults at risk or anyone under 18.
- Escalate concerns about staff to the DSL, or the Head of Service/Assistant Director if the concern relates to the DSL.
- Use the Whistleblowing procedure if concerns are not being addressed properly.

Low-Level Concerns

- Report any behaviour that feels inconsistent with professional standards, even if not serious.
- Low-level concerns will be logged, reviewed and monitored for patterns.
- Staff will not face retaliation for raising concerns in good faith.

Prevent, Extremism & Harmful Narratives

- Stay alert to radicalisation risks affecting adults and children, in particular those related to the Borough.
- Challenge extremist, hateful or harmful narratives, including misinformation and conspiracy material.
- Escalate Prevent concerns promptly to the DSL.

Health, Safety & Environment

- Report hazards and ensure safe use of equipment, especially where children may be present.

- Follow emergency procedures and first aid and incident reporting requirements.

Training, Supervision & Compliance

- Complete mandatory training and any role-specific safeguarding modules.
- Attend supervision and request guidance whenever uncertain.
- Non-compliance with this Code may lead to disciplinary action.

7. Reporting and managing concerns

7.1 Child Safeguarding Pathway

Where a concern involves a child—whether through Family Learning, or a child who is present on site for any reason—staff must follow the child safeguarding pathway. Any concern about the safety or welfare of a child must be reported to the Designated Safeguarding Lead without delay. The DSL will determine the appropriate referral route, which may include the MultiAgency Safeguarding Hub (MASH), Children’s Social Care, or the police where a child is at immediate risk of harm. If the concern relates to the behaviour or conduct of a member of staff, the DSL will contact the Local Authority Designated Officer (LADO) in accordance with statutory guidance. Staff should not attempt to investigate concerns themselves and must avoid asking leading or exploratory questions.

7.2 Adult Safeguarding Pathway (Care Act s.42)

When a concern relates to an **adult at risk**—as defined by the Care Act 2014 as someone who has care and support needs and who may be unable to protect themselves from abuse or neglect—staff must report the concern to the DSL immediately. The DSL will consider whether the situation meets the statutory threshold for an Adult Safeguarding Enquiry under Section 42 of the Care Act and, where appropriate, will refer the concern to the local authority’s Adult Social Care team.

Although most of our adult learners do **not** fall within the legal definition of an adult at risk, they may still face significant barriers or vulnerabilities such as mental health difficulties, domestic abuse, homelessness, financial instability, social isolation, disability, or other personal circumstances that place them at increased risk of harm. ALS therefore applies safeguarding principles to **all adults**, recognising that concerns about an adult learner’s welfare may still require action, support, or signposting even if they do not meet the Care Act threshold.

Staff must remain professionally curious and report any concern—whether linked to a Care Act adult at risk or an adult experiencing wider vulnerabilities—to the DSL without delay. The DSL will assess the nature of the concern, decide whether statutory adult safeguarding procedures apply, and determine the appropriate next steps, which may include signposting, Early Help-style support, multi-agency liaison, wellbeing interventions, or referral to Adult Social Care where necessary.

7.3 Emergencies

Call **999** and notify the DSL immediately.

7.4 Recording

Accurate and timely recording is a vital part of safeguarding practice. As soon as you become aware of a concern—whether through something you observe, something a learner tells you, or information shared by another person—you must write down the details at the earliest safe opportunity. Your account should focus on **factual observations**, including the date, time, location, who was involved, and what was said or seen. Where a learner speaks to you directly, record their words as closely as possible and place any quotes in quotation marks. Avoid assumptions, interpretations or personal opinions.

Records must be made using the Incident Record Form, which is available in the tutor and managers' offices, the reception and on the Learning Hub. Completed forms must be passed to the Designated Safeguarding Lead (DSL) **immediately**. Prompt reporting supports accurate recall and allows the DSL to take timely action. If the learner displayed any notable behaviour—such as distress, withdrawal, avoidance, fearfulness, or changes in mood—this should also be included.

If a learner discloses harm, your role is to listen calmly and sensitively, without interrupting or pressing for detail. Reassure them that talking was the right thing to do and make it clear that you **cannot promise confidentiality**, as the information must be shared with people who can help. Ask only open questions to clarify understanding; do not lead, prompt, or attempt to investigate. Keep your tone neutral and your body language supportive—strong emotional reactions such as shock, anger or disbelief can cause a learner to stop talking.

All safeguarding information is handled **confidentially and lawfully**. The DSL will store records securely, retain them in line with statutory requirements, and share information only on a **strict need-to-know basis**. The DSL will also maintain a full chronology of concerns, decisions and actions taken—including the rationale for any decisions not to refer to external agencies. Where information is shared with professionals such as MASH, Adult Social Care, LADO, Channel or the police, the DSL will document what was shared, when and with whom.

Remember that safeguarding responsibilities apply equally to adults, adults at risk, and children present in Family Learning provision. If you believe someone is in immediate danger, **call 999 first**, then notify the DSL as soon as it is safe to do so.

Staff must also remain aware of the mandatory duty to report to the police any case where **female genital mutilation (FGM)** appears to have been carried out—or is suspected to be imminent—on a girl under 18.

If you are unsure about anything, **consult the DSL or a senior manager immediately**. No concern is too small to report. Your first responsibility is always to the safety and wellbeing of the learner.

Recording Procedure Checklist (Quick Reference)

- ☐ Write your notes **as soon as possible**, using Incident Record Form.
- ☐ Record **facts only**: what you saw, heard, and the learner's exact words where possible.

- ☐ Include **date, time, location, people present, behaviours observed** and any immediate actions you took.
- ☐ Listen calmly, **do not promise confidentiality**, and avoid leading or investigative questions.
- ☐ Submit your record to the **DSL immediately** and follow any instructions given.
- ☐ Treat all information as **confidential** and share only with those authorised to know.
- ☐ Call **999** if anyone is in immediate danger, then inform the DSL.
- ☐ When in doubt—**always ask, always report**.

8. Early Help & Preventative Support (emerging needs)

Early Help is the proactive support we offer before concerns escalate into significant harm. It is a core part of safeguarding at ALS and applies to all adult learners, adults at risk, and children attending Family Learning provision. By identifying emerging needs early—emotional, social, practical or educational—we reduce risk, prevent crises, and connect learners with the right help at the right time.

Early Help may be appropriate where there are early indicators of vulnerability such as changes in mood, presentation or attendance; signs of stress within a family; concerns about parental capacity or coercive control; mental health or wellbeing difficulties; disability-related barriers; social isolation; housing or financial stress; or low-level online harms. These issues do **not** always meet statutory thresholds, but they **do** require a safeguarding response from the Service.

Staff responsibilities: All staff must remain professionally curious, notice patterns, and act promptly. You do not need proof of harm to raise an Early Help concern. If something feels “not quite right,” share it with the DSL so that needs can be assessed early and proportionate support can be offered.

What happens next: The DSL will review the information and determine the most appropriate action. This may include:

- practical adjustments within teaching or assessment;
- wellbeing conversations and informal monitoring;
- signposting or referral to community and voluntary-sector support;
- liaison with Family Hubs, mental health, domestic abuse or housing services;
- a multi-agency Early Help plan for families; or
- (where risk increases) escalation to Children’s Social Care or Adult Social Care.

Early Help complements, but does not replace, statutory safeguarding processes. If at any stage risk of significant harm is identified—whether to a child or to an adult at risk—the DSL will initiate the relevant child or adult safeguarding pathway without delay. All Early Help records are kept securely and shared on a need-to-know basis only.

Early Help is everyone's business. It ensures we respond to **emerging needs** among the majority of our adult learners who may not meet Care Act thresholds, and to families and children in our provision, so that problems are addressed early and learners are kept safe, engaged and supported.

9. Attendance & Missing Learners

Regular attendance is an important part of learner engagement, progress and wellbeing across Waltham Forest Adult Learning Service. Although most of our learners are adults who manage their own attendance independently, changes in attendance patterns can sometimes indicate emerging difficulties, vulnerabilities or safeguarding concerns. For this reason, attendance contributes to our wider safeguarding approach, particularly when unexplained absences occur or when a learner's pattern of engagement changes suddenly.

For the majority of adult learners, an unexpected absence will usually be managed through normal learner-support processes, such as making contact to offer help, signposting to support, or exploring any barriers that may be affecting participation. However, where staff have concerns about a learner's wellbeing, or where an adult learner is known to have additional vulnerabilities, disabilities or care and support needs, unexpected or repeated absence may warrant a welfare check. This may involve contacting the learner directly, and—only where appropriate and previously agreed—making contact with a nominated caregiver, key worker or support service.

Because children who attend Family Learning sessions are enrolled through their school and remain under the school's attendance and safeguarding arrangements, ALS is not responsible for monitoring their school attendance. However, if a child in a Family Learning session appears distressed, unsafe, or discloses concerning information, this will be treated as a safeguarding concern and addressed through the child safeguarding pathway, regardless of school involvement.

In the rare circumstances where a learner is an adult at risk as defined by the Care Act, and a pattern of absence leads staff to believe the individual may be unsafe or unable to protect themselves, the DSL may consider escalating the concern to Adult Social Care. This decision will be based on the level of vulnerability, the nature of the concern, and any other contextual information available. Referrals of this type are expected to be exceptional, but the Service will always act where there is a legitimate concern for safety or significant harm.

In all cases, staff must report any worrying patterns of non-attendance or inability to contact a vulnerable or at-risk learner to the DSL without delay. The DSL will decide whether this forms part of a broader safeguarding picture and determine what action, if any, is needed.

10. Partner Organisations

Waltham Forest Adult Learning Service does not currently subcontract or commission external delivery; however, partner organisations may be involved in community activity, Family Learning settings, or future funded provision. Where ALS provides funding, grants, or oversight for any learning delivered by a partner organisation, ALS retains overall safeguarding responsibility for those learners.

Any partner organisation working with ALS learners must have its own up-to-date Safeguarding and Prevent Policy, a designated DSL, and robust safer recruitment procedures. This will be checked via Due Diligence processes if the need arises. Partners are expected to follow their own policies and comply with ALS safeguarding procedures when working with ALS-funded learners, including reporting safeguarding concerns to the ALS DSL without delay.

If subcontracting or commissioned delivery arrangements are established in the future, partners will be required to meet ALS safeguarding standards, share relevant safeguarding information, and work transparently to ensure all learners remain safe, supported and protected.

11. Online Safety & Cyber Safeguarding

11.1 Purpose and Scope

Online safety is a core part of safeguarding at Waltham Forest Adult Learning Service. Our learners are primarily adults; however, our duty extends to **adults at risk** and to **children present in Family Learning or LDD contexts**. We protect learners and staff from harmful content, contact, conduct and commerce online, and we maintain cyber-resilient systems to reduce the risk of data breaches, ransomware, and disruption to learning. This section applies to all ALS activity delivered **on-site, online, in community venues or through partner organisations**.

11.2 Online Risk Framework (the “4Cs”)

We use the **4Cs** to identify, teach and manage online risk. These categories guide our prevention, detection and response:

- **Content** – Exposure to harmful material such as pornography; violent or extremist content; racist, sexist or otherwise hateful material; anti-Semitic or Islamophobic content; false or misleading information (e.g., “fake news”), and content promoting self-harm or suicide.
- **Contact** – Harmful interactions, including grooming, catfishing, impersonation, coercive pressure, and deceptive advertising or social-engineering.
- **Conduct** – Risky or harmful behaviours by users (e.g., sending/receiving explicit images, cyberbullying, doxxing, oversharing personal information, unsafe file sharing).
- **Commerce** – Financial and transactional risks (e.g., scams, phishing, fraudulent ads, gambling, subscription traps).

Where there is any suspicion that a learner or staff member has been targeted by **phishing or scams**, staff must **alert the DSL immediately**. The DSL will coordinate support and, where appropriate, report to the **Anti-Phishing Working Group (APWG)** at <https://apwg.org>.

11.3 Governance, Roles and Policy Alignment

Online safety is embedded across ALS policies (Safeguarding & Prevent; Staff Code of Conduct; Data Protection; Acceptable Use/Online Safety; Learner Agreement) and curriculum. The DSL oversees online-safety risk management and incident response, working with IT/security leads and managers to

ensure prevention, detection and response controls are in place. Curriculum leads embed digital resilience, critical thinking about misinformation/disinformation, and respectful online participation within teaching and induction.

11.4 Technical and Organisational Controls (Filtering, Monitoring & Cyber Resilience)

Adult Learning Service maintains robust filtering and monitoring to reduce exposure to inappropriate or dangerous material on ALS networks and devices. These controls are reviewed regularly, with changes tracked, tested and documented. We are accredited with Cyber Essentials and align to the DfE Cyber Security Standards for education providers. Together, these controls strengthen our resilience, help protect personal and special category data, and reduce the risk of ransomware, data loss and service disruption. Any suspected breach or compromise must be reported to the DSL and Information Governance immediately via the incident process.

11.5 Safe Remote & Blended Learning

When learning is delivered online or in hybrid formats, staff must:

- Use approved platforms (e.g., Teams/Zoom) with waiting rooms/lock-in and appropriate privacy settings.
- Log each session (date, time, attendance) and record sessions only where authorised, with the correct privacy notices and defined retention periods.
- Maintain professional appearance and behaviour; use neutral/agreed backgrounds and ensure a private space for teaching.
- Keep all one-to-one contact on approved channels; never use private/personal accounts.
- Apply the Learner Online Code: respect, privacy, punctuality, appropriate language, **and no unauthorised recording**.
- Ensure any resources used comply with copyright/licensing and accessibility requirements.

Where a learner needs to keep their camera off, the lecturer records the agreed reason in the group profile and uses alternative engagement checks (e.g., chat, polls, voice) and the learner must say that they have their camera off, at the start of the lesson and in the chat.

It is expected that all learners will keep their cameras on during any online learning session.

11.6 Data Protection & Privacy

All personal data used in remote delivery must be handled in line with the Data Protection Act 2018/UK GDPR and ALS policies. Staff must:

- Access learner data only through secure systems;
- Avoid storing files locally on personal devices;
- Use strong passwords and MFA where available;
- Follow agreed arrangements for recording storage, access and retention;
- Report any data incident immediately.

11.7 Artificial Intelligence (AI) & Emerging Technologies

AI tools may be used for teaching, learning and accessibility only where approved and in line with ALS guidance. Staff and learners must never input personal or sensitive data into public AI tools and must not use AI to make safeguarding judgements or profile learners. Staff teach learners about AI limitations, deepfakes, impersonation risks, and the importance of verifying sources. All AI use must reinforce critical thinking and safety, not replace it.

11.8 Staff & Learner Responsibilities

- **Staff** model professional online conduct at all times; they must challenge harmful content or behaviour, address misinformation/disinformation appropriately, and escalate concerns promptly to the DSL.
- Learners follow the Learner Online Code, keep themselves and others safe online, and report concerns about harmful content, contact or scams to staff quickly.

11.9 Support, Training & Curriculum

Adult Learning Service provides regular training and updates on online safety, remote teaching practice, cyber hygiene, phishing awareness, password security and safe AI use. Lecturers embed digital citizenship, critical evaluation of information (including how to spot misinformation/disinformation and conspiracy narratives), respectful communication, and privacy literacy across programmes. Where helpful, we use short, accessible resources and videos to reinforce key messages.

11.10 Incident Reporting & Response

Any online safety concern—harmful content exposure, grooming attempt, bullying, hate incident, sexualised behaviour, self harm/suicide content, suspected fraud or cyber incident—must be reported to the DSL immediately. The DSL will assess risk, put immediate safety measures in place, decide on the appropriate pathway (child or adult), record actions and, where necessary, notify external partners (e.g., police, MASH, Adult Social Care, LADO, Anti-Phishing Working Group, or other cyber incident channels).

All existing safeguarding procedures apply equally to online contexts.

11.11 Assuring Effectiveness

We review our online safety and cyber controls at least annually and after any incident or near miss. This includes checks on filtering/monitoring efficacy, spot audits of remote delivery practice, curriculum content reviews, and learner/staff feedback. Findings inform updates to training, procedures and technical controls.

Reminder: Online safety is **everyone's responsibility**. Keeping learners safe online requires vigilance, good digital habits and swift reporting—whether concerns arise on ALS networks, personal devices used for study, or public platforms.

12. Prevent Duty

Waltham Forest Adult Learning Service is committed to providing a safe, inclusive learning environment where extremist views, radicalisation, hate narratives and discriminatory behaviour have no place.

Prevent is a key part of our safeguarding responsibilities and focuses on reducing the risk of individuals being drawn into extremism, terrorism, or harmful ideological influences. Our duty applies to all learners, including adults, adults at risk (including LDD), and children present through Family Learning.

Extremism and radicalisation can affect anyone and can occur in any setting. With the increasing use of digital platforms and social media, learners may be exposed to extremist content, misinformation, disinformation and conspiracy narratives online—often without actively seeking them out. These online harms can isolate individuals, distort their worldview, and increase their vulnerability to manipulation. Creating safe spaces where learners can explore sensitive or controversial topics openly, respectfully and critically is therefore essential. Staff must balance freedom of speech with the responsibility to protect learners from harm, ensuring that discussions are facilitated safely and that extremist or hateful views are challenged appropriately.

For the purpose of this policy, **extremism** is defined as ***vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of the armed forces, whether in this country or overseas.*** Extremists seek to create division, fear and mistrust, often by exploiting grievances or social inequalities.

Education plays a central role in helping learners develop the critical thinking, digital resilience and confidence needed to challenge such narratives.

Any Prevent-related concern must be reported to the Designated Safeguarding Lead immediately. The DSL will assess the information, take proportionate action, and, where appropriate, refer to the **Channel panel** for early intervention and support.

Staff should remain alert to indicators such as:

- learners discussing exposure to extremist materials, content or influences
- extremist graffiti, symbols or written messages
- attempts to access extremist or hate-based content online
- expressions of extremist or hateful ideologies
- the use of extremist language to exclude, target or intimidate others
- intolerance or hostility based on protected characteristics or cultural identity
- attempts to pressure others into adopting extremist beliefs or behaviours

Staff may also be notified by local authorities, police or partner agencies about external risks or emerging concerns relating to specific individuals or communities. This information must be handled sensitively and acted upon appropriately in line with safeguarding procedures.

Further guidance on Prevent can be found on:

- www.gov.uk/government/publications/prevent-duty-guidance
- www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty
- www.preventforfeandtraining.org.uk

See Annex 1: Channel Referral Process

13. SEND, LDD & Inclusion Safeguarding

Waltham Forest Adult Learning Service is committed to ensuring that all learners—particularly those with Special Educational Needs and Disabilities (SEND) or Learning Difficulties and Disabilities (LDD)—are able to participate safely, confidently and with dignity. Many learners with additional needs may be more vulnerable to abuse, neglect, exploitation or harmful behaviours, and may face barriers in recognising risk, communicating worries, or seeking help. Safeguarding learners with SEND and LDD therefore requires staff to provide personalised, sensitive and inclusive support, and to maintain an awareness of the unique ways in which safeguarding concerns may present in these groups. Staff must ensure that reasonable adjustments are in place to support safe and equal participation in learning. This may include adapting teaching methods, modifying resources, adjusting physical environments, or providing additional scaffolding to enable learners to understand safeguarding information in an accessible way. Staff should also be alert to the possibility that learners with SEND or LDD may disclose concerns non-verbally, such as through changes in mood, behaviour, attendance, communication style or engagement. These signs must be taken seriously, recorded, and reported to the DSL promptly.

Because many learners with SEND or LDD communicate in diverse ways, staff must take time to consider communication needs and adapt their approach accordingly. This may involve using visual prompts, simpler language, repetition, assistive technology or alternative communication tools. Staff must not assume that a learner's difficulty in expressing themselves means that their concern is less significant.

Safeguarding learners with SEND and LDD often requires collaboration with carers, advocates, support workers, key workers, or involved professionals. Staff must work in partnership with these individuals—where appropriate and with the learner's consent—to ensure that the learner's needs, risks, strengths and preferences are fully understood. Where there are concerns about a learner's ability to make or communicate decisions, the principles of the Mental Capacity Act must be applied, and guidance sought from the DSL.

Learners with SEND or LDD may experience heightened grooming and exploitation risks, particularly online. They may be more trusting, more easily coerced, or less aware of digital dangers. Staff must reinforce clear, simple boundaries; teach digital safety through accessible methods; and remain vigilant for signs that a learner is being targeted or manipulated.

Further LDD-specific safeguarding guidance, including examples of indicators, communication strategies, and tailored risk-management approaches, is provided in **Annex 3**, which must be read alongside this section.

14. Safeguarding in the Curriculum

Safeguarding and Prevent are integral to the learning experience at Waltham Forest Adult Learning Service. We are committed to creating a curriculum that not only develops knowledge and skills but also promotes learner wellbeing, digital resilience, critical thinking, equality, respect and safe decisionmaking. Safeguarding themes are woven through our provision for all curriculum areas, including English, maths, ESOL, digital skills, vocational programmes, employability, wellbeing courses, Family Learning, accredited and nonaccredited learning, and provision with LDD learners.

Although safeguarding may be more explicit in some areas—such as Family Learning or programmes supporting adults with additional needs—it is a responsibility that sits across all lecturers, all subjects and all learning environments. Every curriculum area must contribute to a culture where learners feel safe, supported and confident to seek help when needed.

All lecturers are expected to create an atmosphere of respect, inclusion and psychological safety, guided by ALS values and the Staff Code of Conduct. This includes establishing clear behaviour expectations at induction, modelling respectful communication, challenging discriminatory attitudes, and reinforcing messages about staying safe both online and offline. Wherever relevant, lecturers should draw learners' attention to safeguarding topics naturally within their subject—for example, by exploring online safety when teaching digital skills, or building confidence and self-advocacy within employability programmes.

Learners should be supported to develop the knowledge and skills needed to recognise unsafe situations, understand their rights, and know how to access help. This includes building resilience to manipulation, misinformation, grooming, exploitation and extremist narratives. Lecturers should encourage learners to ask questions, think critically, evaluate information, and discuss sensitive issues appropriately. Safeguarding concerns that emerge during teaching or group discussion must be responded to in line with this policy.

As part of our statutory Prevent Duty, safeguarding in the curriculum also includes promoting British Values—democracy, rule of law, individual liberty, mutual respect and tolerance—in ways that are relevant, respectful and sensitive to our diverse adult community.

In addition to the expectations across the full curriculum, safeguarding is explicitly addressed within **Family Learning**. These areas may involve learners who face distinct vulnerabilities, including children

and adults with additional needs, and therefore require curriculum content that supports families, builds communication skills, and reinforces safety strategies.

Across all curriculum areas, staff must be attentive to disclosures, worries, or changes in a learner's presentation, responding sensitively and reporting concerns promptly to the DSL.

Safeguarding within the curriculum ensures that learners not only achieve their educational goals but also develop the skills, confidence and resilience to thrive safely in learning, work and everyday life.

15. Information Sharing & GDPR

Waltham Forest Adult Learning Service teaches adults aged 19 and over, many of whom balance learning with work, family, health or day-to-day responsibilities. Our approach to information sharing reflects the fact that adult learners have a right to privacy, autonomy, and control over their personal data, and that safeguarding concerns involving adults must be handled with care, proportionality and respect.

In line with the UK GDPR and the Data Protection Act 2018, we only collect and share information that is necessary, proportionate and lawful. Most information relating to adult learners—such as attendance, progress, or wellbeing—will not be shared with external parties (including employers, partner organisations, or family members) without the learner's explicit consent, unless a safeguarding or legal requirement overrides this. Learners are encouraged and supported to advocate for themselves, particularly when communicating with potential employers or external agencies. Where they need help, staff may assist them in preparing information, but we will not disclose personal details on their behalf unless the learner provides informed consent.

Safeguarding information, however, may need to be shared **without consent** where there is a risk of significant harm to the learner or to someone else. In such cases, sharing must follow safeguarding and legal principles and be documented carefully by the DSL. Outside of these safeguarding exceptions, information sharing must always be transparent, agreed with the learner, and undertaken in a way that respects their dignity and independence.

All information held by ALS is:

- Shared only on a need-to-know basis, meaning only those staff or agencies with a legitimate professional role will receive the minimum information necessary.
- Stored securely, using approved systems and access controls, with strict limitations on who can view sensitive information.
- Retained in line with statutory requirements, the Council's or our funder's retention schedules, and data-protection legislation.

Learners are informed about how their data is collected, used and protected through the enrolment process, privacy notices and learner-facing materials. Staff must follow Adult Learning Service and

Waltham Forest Council data-protection procedures at all times and seek advice from the DSL or Information Governance where they are uncertain.

Information sharing is a core part of safeguarding adults and supporting learner success, but it must be carried out carefully, respectfully and lawfully. The guiding principle is that adults have the right to make their own decisions, to consent to information sharing wherever possible, and to be partners in conversations about their safety, progress and future opportunities.

16. Quality Assurance

Waltham Forest Adult Learning Service is committed to maintaining high standards of safeguarding practice through regular monitoring, review and continuous improvement. Quality assurance enables us to identify strengths, address gaps, understand emerging risks and ensure that safeguarding remains embedded across all areas of provision, including Family Learning, adult learning and LLDD support.

Safeguarding quality assurance activities take place throughout the year and involve leaders, the DSL, delivery teams and partner organisations where applicable. These activities include an annual safeguarding audit, which reviews policies, procedures, safer recruitment, reporting processes, training compliance and organisational culture. In addition, termly casefile reviews help ensure that recording is accurate, decisionmaking is robust, and concerns are managed in line with statutory requirements. Family Learning provision is also reviewed regularly to ensure that safeguarding arrangements remain appropriate for mixed-age environments, and to identify any recurring themes related to parental support, child welfare concerns, or practitioner training needs.

Although Adult Learning Service does not conduct a standalone LLDD safeguarding review, the DSL and curriculum leads routinely analyse LLDD-related safeguarding cases to identify patterns, vulnerabilities, communication or access challenges, and staff development priorities. This ensures that LLDD safeguarding remains a central focus and that practice evolves in response to learner needs.

Quality assurance also includes 'External scrutiny' readiness checks, ensuring that safeguarding remains ready to external scrutiny at all times. These checks may involve reviewing compliance against statutory duties, testing staff understanding, sampling case records and seeking learner feedback.

Findings from all quality assurance activities are used to inform staff training, policy updates, curriculum planning, partnership expectations and wider service improvements. This cycle of reflection, review and action ensures that safeguarding at Adult Learning Service is dynamic, accountable and consistently aligned to best practice.

17. Staff Training

Waltham Forest Adult Learning Service is committed to ensuring that all staff, volunteers and partner colleagues have the knowledge, confidence and skills required to safeguard adult learners, adults at risk (incl LDD), and children who may attend Family Learning provision. Safeguarding training is essential in an adult-learning environment where learners may have multiple barriers, vulnerabilities or personal circumstances that require sensitive and proportionate support. All staff must understand their responsibilities, know how to identify risks, and be confident in reporting concerns promptly.

All new staff receive a comprehensive safeguarding induction before they begin working with learners. This induction covers the Safeguarding and Prevent Policy, online safety and cyber-security expectations, the Staff Code of Conduct, information-sharing principles, and how to report concerns to the DSL.

Formal safeguarding refresher training is provided every two years for all staff, alongside annual safeguarding updates delivered by the DSL or a recognised safeguarding practitioner. These updates reflect changes in legislation, emerging risks, updates to Waltham Forest Council procedures, and learning from safeguarding reviews or case-file audits. Any mid-year policy or procedural updates are communicated via team briefings, email updates or staff meetings to ensure all colleagues remain informed.

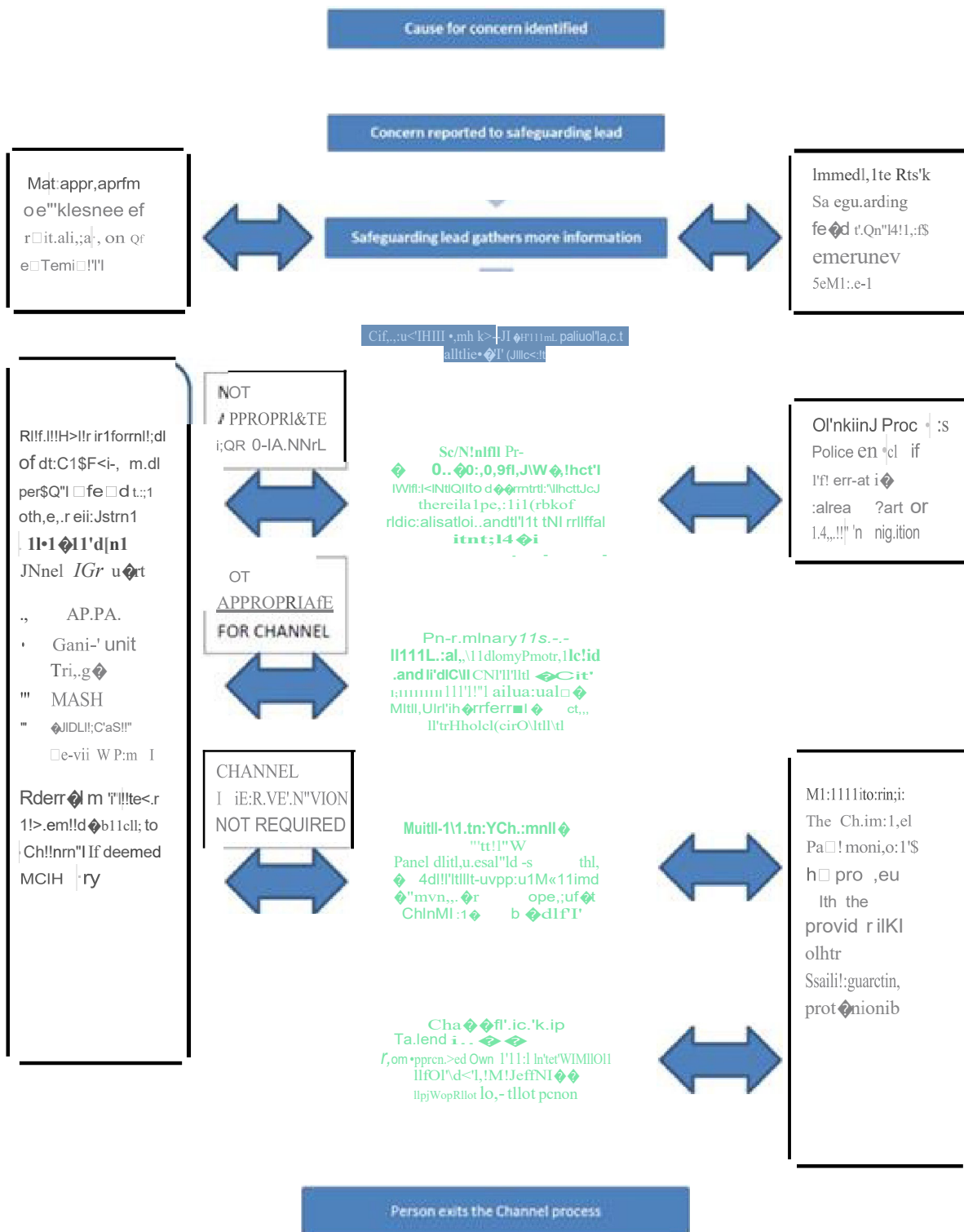
The Designated Safeguarding Lead (DSL) and Deputy DSL complete Level 3 safeguarding training at least every three years, with additional annual CPD recorded on the central training log. At least one member of each recruitment panel must have completed Safer Recruitment training within the last three years.

Training includes a strong emphasis on online safety, cyber-security, phishing awareness, responsible use of technology, and the safe use of artificial intelligence tools. Staff are trained to recognise online harm—including grooming, misinformation, disinformation and extremist narratives—and understand their role in supporting learner digital resilience. Training also covers respectful and appropriate communication, the management of professional boundaries, and how to support learners who may disclose concerns in person or online.

The DSL and Deputy DSL remain available to provide day-to-day advice, guidance and professional support to staff who have concerns or who are unsure how to proceed. Staff are encouraged to ask for help and to discuss emerging issues early.

Safeguarding training is monitored as part of the Service's quality assurance processes, and compliance with training requirements is recorded centrally. Staff who do not meet mandatory training expectations will be supported to complete the necessary learning promptly, as safeguarding competence is an essential requirement of their role. **See Annex 4: Training Matrix**

Annex 1: Channel Referral Process



Annex 2: Family Learning safeguarding guidance

Family Learning brings together adults and children in shared educational activities, often delivered in schools, community venues or children's centres. Because these sessions involve mixed-age groups, and because responsibility for safeguarding is shared between Adult Learning Service and the host organisation, staff must understand the specific safeguarding arrangements that apply in these settings.

Where Family Learning is delivered on school premises, the school's safeguarding procedures apply to all children present, including reporting child-protection concerns to the school's Designated Safeguarding Lead. Adult Learning Service staff must still identify concerns, respond appropriately, and ensure information is shared promptly with the school DSL. For adult learners, including parents/carers, ALS safeguarding procedures must always be followed. Staff working in Family Learning therefore hold a dual awareness: children are protected under the school's safeguarding system, and adult learners are protected under ALS safeguarding pathways.

This annex outlines the safeguarding expectations specific to Family Learning delivery across all ALS settings.

1. Supervision

Parents and carers have primary responsibility for supervising their children during Family Learning unless the session has been explicitly designed for unaccompanied children and appropriate staffing ratios, DBS checks and risk assessments are already in place. Adult Learning Service staff must remain vigilant to overall safety and well-being, monitor the environment, and ensure that activities take place safely and appropriately.

2. Environment

Family Learning involves creative, practical or play-based activities in which children may be present. Staff must ensure that:

- Children are never left unsupervised or allowed to wander beyond the learning space.
- Staff must not take children to the toilet or provide personal care; these tasks remain the responsibility of the parent/carer or school staff.
- Materials such as scissors, glue guns, paints, or tools are used safely, with clear instructions and hazard-minimisation in place.
- Learning spaces are checked in advance for appropriate layout, accessibility, safety and suitability for mixed-age participants.

3. Harmful or Concerning Parental Behaviour

During Family Learning sessions, Adult Learning Service staff may witness interactions or disclosures that raise concern about a child's welfare or the wellbeing of the adult learner. Staff must report immediately to the school DSL (for concerns about a child) or the ALS DSL (for concerns about an adult). Concerns may include:

- Parental aggression or threatening behaviour

- Signs of domestic abuse
- Substance misuse
- Concerns about parenting capacity, neglect or emotional harm
- Any behaviour that suggests a child or adult may not be safe

Where a concern involves **both** the child and the parent/carer, staff must ensure both safeguarding pathways are notified: the school DSL for the child, and the ALS DSL for the adult.

4. Safeguarding Unborn Children

If a pregnant learner discloses information that suggests they or their unborn child may be at risk, staff must report the concern to the ALS DSL immediately. The ALS DSL will make a referral to the appropriate children's safeguarding team where necessary.

5. Lone Working with Families

Family Learning may take place in community venues, schools, or settings where staff work with parents and children in varied environments. To ensure staff safety and good safeguarding practice:

- Two adults being present are preferred when delivering Family Learning in community settings.
- Staff must notify their manager (or designated contact) when arriving at and leaving a venue.
- A risk assessment must be completed for each venue and session type, addressing layout, entry/exit, supervision arrangements, environment safety, and emergency procedures.

6. Recording Concerns About Children or Adults

Any safeguarding concern arising in Family Learning must be recorded promptly, factually and securely. The correct pathway must be followed:

- **Concerns about a child:** Report immediately to the **school DSL**, and inform the ALS DSL.
- **Concerns about an adult learner:** Follow the ALS adult safeguarding pathway.
- **Concerns involving both:** Notify both DSLs so each system can take the appropriate action.

Recording should reflect what was seen or heard, include the learner's own words where a disclosure occurs, and follow ALS recording procedures for adults and the school's procedures for children.

Annex 3: Safeguarding Learners with Learning Difficulties or Disabilities (Children and Adults)

Learners with learning difficulties or disabilities (LDD), whether children in Family Learning or adults in our core provision, may experience additional barriers to recognising unsafe situations, expressing concerns, or accessing help. This annex provides practical guidance for staff on how to identify, respond to and support safeguarding concerns involving LDD learners. It must be read alongside Section 13 of this policy.

1. Communication and Disclosure

LDD learners may communicate in diverse ways, and safeguarding concerns may be expressed directly, indirectly or non-verbally. Staff must adapt their approach to ensure every learner has an equitable opportunity to disclose worries or seek help.

- Staff should use **clear, simple language**, visual tools (symbols, pictures, schedules), and alternative or augmented communication methods where helpful.
- Non-verbal behaviours such as **distress, withdrawal, refusal, regression, avoidance, agitation or confusion** must be treated as potential indicators of harm, not simply attributed to disability.
- Staff must never dismiss concerning behaviour as “just part of their condition”; patterns or changes should always prompt professional curiosity.
- When a learner discloses, staff should allow extra time, avoid interrupting, and check understanding gently while avoiding leading questions.
- Learners may disclose in fragmented or indirect ways; staff should listen carefully and record the information in full.

2. Mental Capacity

Some LDD adults may lack the capacity to make specific decisions at particular times. Staff must apply the Mental Capacity Act 2005 principles when safeguarding concerns arise:

- Capacity must be presumed unless there is clear evidence to the contrary.
- A learner must be supported to make decisions in a way that suits their communication needs.
- A learner is not to be deemed incapable simply because they make what others view as an unwise decision.
- Where a learner lacks capacity to make a particular safeguarding decision, staff must involve the DSL so that decisions are made in the learner’s best interests, using an appropriate and lawful process.

3. Additional Vulnerabilities

LDD learners, both adults and children, experience significantly increased safeguarding risks. Staff must be aware of vulnerabilities linked to:

- **Grooming and exploitation**, including online and in-person manipulation.
- **Financial abuse** such as theft, exploitation by acquaintances, or pressure to hand over money.
- **Online manipulation**, including misinformation, impersonation, scams, and targeting via social media.
- **Coercive control**, especially where learners rely on others for support or daily living.
- **Peer pressure**, where trust, dependency or suggestibility increases the likelihood of exploitation.

Staff should report any suspicion of exploitation immediately, even if the learner has not disclosed harm.

4. Working with Carers, Advocates and Support Workers

Multi-agency working is essential in supporting LDD learners.

- Staff should involve carers, advocates, key workers or support professionals appropriately, and with the learner's consent wherever possible.
- Decisions should always be guided by the learner's best interests, taking into account their wishes, communication style and individual strengths.
- Where consent is unclear—or where there is a concern that consent may be coerced or unsafe—the DSL must be consulted immediately.
- Any support plans, risk assessments or external information that relate to a learner's vulnerability must be recorded within safeguarding documentation so that staff understand the learner's needs and history.

Working collaboratively ensures that safeguarding decisions are informed, consistent and holistic.

5. Prevent for LDD Learners

Prevent education must be adapted for LDD learners to ensure it is accessible, meaningful and proportionate. Staff should:

- Use concrete, real-life examples rather than abstract scenarios.
- Provide simple explanations of risk, extremism, online grooming and misinformation.
- Use clear, consistent boundaries when discussing online or ideological influence.
- Present information in small, digestible steps, using visual aids or repetition where helpful.
- Reinforce critical-thinking skills appropriate to the learner's level and encourage learners to check with trusted adults if something online feels worrying or confusing.

LDD learners may be especially vulnerable to extremist grooming, misinformation and conspiracy content online. Staff must remain alert to these risks and escalate concerns to the DSL promptly.

Annex 4: Safeguarding & Prevent Training Matrix

This matrix outlines the minimum training expectations for all staff working across Waltham Forest Adult Learning Service, including lecturers, sessional staff, volunteers, apprentices, managers, governors and partner-delivered staff.

Training Topic	Who Must Complete It	Level/Content	Frequency	Delivered By	Recorded On
Safeguarding Induction	All staff before working with learners	Intro to WFALS safeguarding, DSL contacts, reporting, low-level concerns, online safety basics, Code of Conduct	Once (at induction)	DSL/Deputy DSL or trained manager	Central training log
Safeguarding (Core) – Level 2 equivalent	All learner-facing staff (including lecturers, assessors, support staff)	Recognising abuse, disclosures, reporting, adult safeguarding, children in Family Learning, LLDD safeguarding	Every 2 years	DSL or external accredited provider	Central training log
Annual Safeguarding Update	All staff	New risks, updates to law/policy, service-wide themes, learning from case reviews	Every year	DSL/Deputy DSL	Central training log
Prevent Duty Training	All staff	Vulnerability factors, extremist narratives, online radicalisation, reporting & Channel	Every 2 years	DSL/external provider	Central training log
Online Safety & Cyber Security	All staff	Phishing awareness, safe platform use, online conduct, safe AI use, digital safeguarding	Every 2 years (with annual updates)	Council	Central training log
Information Sharing & GDPR	All staff	Consent, confidentiality, adult autonomy, lawful sharing, data breaches	Every 2 years	Council	Central training log
Equality, Diversity & Inclusion	All staff	British Values, inclusion, anti-discrimination, respectful communication	Every 2 years	Council	Central training log

LLDD Awareness Training	Staff teaching or supporting LDD learners	Communication strategies, behaviour cues, vulnerability, Mental Capacity basics	Every 2 years	DSL/External provider	Central training log
Family Learning Safeguarding	Staff delivering Family Learning	Safeguarding children; boundaries; parental supervision; risk in mixed-age groups	Every 2 years	DSL/Family Learning Lead	Central training log
Safer Recruitment	At least one member of each interview/hiring panel	Legislation, checks, digital screening, DBS decision-making	Every 3 years	Council	Central training log
DSL Level 3 Safeguarding Training	DSL & Deputy DSL	Multi-agency working, complex cases, case supervision, Channel, escalation	Every 2 years	Accredited provider	DSL CPD record and Central training log
DSL Annual CPD	DSL & Deputy DSL	Annual professional development aligned to role	Yearly	DSL/external	DSL CPD record
Remote Teaching & Online Facilitation	All staff delivering online sessions	Safe digital practice, recording rules, learner supervision, platform controls	Every 2 years	DSL	Central training log
Whistleblowing & Professional Boundaries	All staff	Reporting unsafe practice, conflicts of interest, maintaining boundaries	Every 3 years	Council	Central training log

Manager Responsibilities Checklist

Managers should:

- Monitor individual training compliance termly
- Ensure new staff complete induction before working with learners or complete an appropriate risk assessment that has been approved by DSL
- Flag expiring training and schedule refreshers
- Support staff who require additional training after case-file audits
- Ensure partner-delivered staff meet the same WFALS training standards

