

Royal Borough of Greenwich, Adult Community Learning	
Title	Safeguarding Policy 2026-27
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Royal Borough of Greenwich Adult and Community Learning Safeguarding Policy and Procedure Guidance

This guidance is addressed to all sub-contracted practitioners and front-line managers who have particular responsibilities for safeguarding and promoting the welfare of Vulnerable Adults and Children.

Policy Statement and Purpose

Royal Borough of Greenwich (RBG) Adult and Community Learning (ACL) is committed to provide a safe and secure learning environment for all its students and staff engaged in the delivery of our programme. As ACL provision is not directly delivered by the Royal Borough of Greenwich but sub-contracted to provider partners, our role is to ensure that the following policies and procedures are adhered to, monitored and reviewed, for all ACL funded Learning. From here in all sub-contractors will be referred to as partners.

Royal Borough of Greenwich recognises its legal duty to work with its partners and other agencies to protect vulnerable students from “significant harm” and to respond to possible safeguarding issues. The relevant guidance is informed from central government, in partnership Royal Borough of Greenwich and the local multiagency Safeguarding Adults Board.

The purpose of this policy is to ensure that procedures are in place so that everyone who is a registered learner on an RBG ACL funded course is safe and protected. The policy will give clear direction to staff, volunteers, and regular visitors about how concerns are managed and acted upon. This will include protecting learners from:

neglect

abuse- physical, sexual, emotional

bullying, including online bullying and prejudiced bullying

racist, disability and homophobic or transphobic abuse

sexual violence and sexual harassment

forced marriage or honour-based violence

radicalisation and /or extremist behaviour

The ACL team and partners seek to create an open and accepting environment for learners as part of their general responsibility for pastoral care. The ACL team hopes that this will help learners feel free to discuss any concerns which may affect educational progress and that they will view the classroom as a safe place if there are any difficulties elsewhere in their lives.

Introduction

The RBG fully recognises the contribution its ACL team and partners can make in protecting learners from harm and supporting and promoting the welfare of all. The key elements of this policy are prevention, protection and support.

Relevant Legislation and Guidance

- Children Acts 1989 and 2004
- The Children and Families Act 2014

- Education Act (2011)
- Keeping Children Safe in Education (KCSIE) 2026 (from September 2026) or KCSIE 2025 until 31 August 2026.
- Working Together to Safeguard Children 2026.
- Care Act 2014
- Equality Act 2010
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Safeguarding Vulnerable Groups Act 2006
- Prevent Duty Guidance (England and Wales) 2023
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- London Multi-Agency Adult Safeguarding Policy and Procedures (April 2019)
- SEND Code of Practice: 0 to 25 years
- UK GDPR and Data Protection Act 2018
- DfE Generative AI in Education (updated Aug 2025).
- DfE Filtering & Monitoring Standards (updated Mar 2025).
- Ofsted Inspecting safeguarding in early years, education and skills settings

The Children Acts 1989 and 2004 state that a child is any person aged under 18. However, in certain circumstances this age limit may be extended, e.g., in the case of a person with learning difficulties or in cases where there has been an abuse of trust.

The safeguarding of adults applies to those aged above 18 where there is some degree of vulnerability. In general, this applies to mental or physical frailty which can impair a person from making decisions or being capable to protect themselves from harm or exploitation.

Although this safeguarding policy is generally applicable to those where a statutory duty to protect exists, the principles apply to any concerns around the welfare of all learners and staff.

Key Definitions

Definitions: Working Together to Safeguard Children 2023

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best life chances

Child Protection is defined as: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

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, is or is at risk of experiencing abuse or neglect and because of those needs are unable to protect themselves against abuse or neglect.

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

Advocacy taking action to help people who experience substantial difficulty contributing to the safeguarding process to say what they want, secure their rights, represent their interests and obtain the services they need.

Best Interest - the Mental Capacity Act 2005 (MCA) states that if a person lacks mental capacity to make a particular decision, then whoever is making that decision or taking any action on that person's behalf must do so in the person's best interest. This is one of the principles of the MCA.

Concern is the term used to describe when there is or might be an incident of abuse or neglect and it replaces the previously use term of 'alert'.

Enquiry establishes whether any action needs to be taken to stop or prevent abuse or neglect, and if so, what action and by whom the action is taken. Previously this may have been referred to as a 'referral'.

Making Safeguarding Personal is about person centred and outcome focused practice. It is how professionals are assured by adults at risk that they have made a difference to people by taking action on what matters to people and is personal and meaningful to them.

Organisational abuse 'is the mistreatment or abuse or neglect of an adult at risk by a regime or individuals within settings and services that adults at risk live in or use, that violate the person's dignity, resulting in lack of respect for their human rights.' (Care and Support Statutory Guidance, 2014)

Person/organisation alleged to have caused harm is the person/organisation suspected to be the source of risk to an adult at risk.

Vital interest a term used in the Data Protection Act (DPA) 1998 to permit sharing of information where it is critical to prevent serious harm or distress, or in life-threatening situations.

Main Principles

The ACL team and its partners promote an ethos where all learners feel secure, are encouraged to talk and are listened to. Due to the duty to protect learners from harm, when concerns are raised, we will not make promises we cannot keep, and we will not keep secrets. Every learner will normally be told by the member of staff they have chosen to talk to, what will happen next.

Staff who observe any behaviour or hear or are told anything significant by a learner or others, must report their concerns to the designated Safeguarding Lead in their organisation and keep RBG ACL team informed at every stage.

Safeguarding issues can revolve around one or more of the following

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Harassment
- Bullying
- E-safety
- Forced Marriage
- Honour Based Violence
- Female Genital Mutilation
- Radicalisation

Prevent

Prevent strategy, published by the Government in 2011, is part of our overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

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

Statutory guidance. Updated Prevent Duty Guidance (England and Wales) 2023

RBG recognises the positive contribution ACL partners can make towards protecting learners from radicalisation to violent extremism. The RBG partners will continue to empower learners to create communities that are resilient to extremism and protecting the wellbeing of particular learners who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists

- Seeking to recruit others to an extremist ideology

If a staff member has a significant concern about a learner beginning to support terrorism and/or violent extremism, they should inform their designated safeguarding officer who will discuss the learner with the nominated local police officer so they can be part of further work to address the issues.

Staff cannot guarantee to keep the concerns for a learner confidential if a referral must be made to the appropriate agencies (Police or Local Authority) in order to safeguard the learner's welfare.

The Social Services and Police have the primary responsibility in the field of child protection and preventing violent extremism respectively. Local authorities have a duty to take steps to protect people at risk in appropriate circumstances and give certain powers to the police so that they can take action to protect them.

It is not the delivery partner's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is cause for concern and to notify the appropriate agencies so that they can investigate and take the necessary action.

All staff that are in regular contact with learners will need to attend basic safeguarding training. The ACL team will endeavour to provide adequate training and supervision to ensure that the needs and welfare of learners are paramount. All new staff are required to have training in the safeguarding arrangements in place as part of their induction.

Learners' Safety and Well-Being

Everyone who has responsibility for learners must take steps to promote their well-being and safety. The potential risks to learners are very broad. A list of some of them is given in Appendix A.

Partners need to be aware of these risks and be alert to the possibility that some of their learners may be experiencing some of these problems.

Learners with particular vulnerabilities

The circumstances of specific categories of learners render them particularly vulnerable to certain types of abuse. Safeguarding procedures are customised in these instances, to address these vulnerabilities designated staff are available to offer support.

These categories include:

- Learners with Special Educational Needs and Disabilities (SEND)
- Looked After Children (LACs) / Young Care Leavers (YCLs)
- Learners on English for Speakers of Other Languages (ESOL) courses
- Adults at risk

Children and adults with SEND are subject to additional safeguarding challenges as they may have difficulties with communication, are at higher risk of peer group isolation and may be disproportionately affected by bullying. Staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

Greenwich ACL aims to provide a supportive environment which encourages learners to speak out about any problems they may have, whether or not they are connected with their study, and will work with the learner to resolve these problems wherever possible. Greenwich ACL aims to provide all its learners with the information they need in order to keep themselves safe, through their curriculum teaching and through dissemination of information via noticeboards, Learner Handbook and on-line resources.

Procedure

All learners on an Adult and Community Learning course must be given a copy of the 2026-7 ACL Learner handbook.

You can obtain additional copies from the ACL team by contacting Nadine Fulker via email

nadine.fulker@royalgreenwich.gov.uk

All sub-contracted provision is delivered through the Skills Framework Mini Competition process and our policy requires each provider to have robust Safeguarding; Equity & Diversity and Health and Safety (H&S) policies which should be made available for inspection during audits, monitoring meetings and observations of teaching and learning. Safeguarding, Prevent, Equity & Diversity and Health and Safety issues will be reviewed during monitoring meeting or at any other time should an issue arise. Risk Assessments of all teaching and learning environments must be reviewed annually, copies to be supplied in an electronic format to the ACL team at the Royal Borough of Greenwich. Where a partner intends to deliver part of the ACL contract at a new venue in year; they must send the ACL team a copy of the risk assessment before courses can commence. If an issue arises during the contract the provider should inform the ACL team as soon as possible and a further risk assessment will need to be conducted before courses can continue at the centre in question.

The ACL team follows Royal Greenwich procedures and the Government's Discloser and Barring Service guidelines. However, to ensure the continued safety of all our learners we will continue to require all providers staff who come into regular contact with learners to be checked through the DBS process and that individual volunteers are risk assessed before starting work. These procedures also apply to supply staff and Royal Greenwich staff.

Risk assessment of safeguarding forms part of the contract monitoring meetings held with providers, and they must supply

additional information as and when required by Royal Greenwich ACL staff.

All learners will be given Equity, Diversity and Inclusion; H&S and Safeguarding induction during the first week of their course. All tutors will ask learners at the beginning of each class if learners feel comfortable and safe, any issues must be addressed before continuing. All staff will be given Equity, Diversity and Inclusion, H&S and Safeguarding induction before commencing work on the ACL contract.

All partners will need to obtain an organisation specific DBS check for each member of staff before they commence working on the Royal Greenwich ACL funded programme. If there is likely to be a delay in receipt of a member of staff's DBS information a risk assessment and Children's Barred List check must be carried out. The ACL team will need to be provided with the staff member's full name, all other previous names used, and their date of birth.

To ensure safeguarding best practice, it is Royal Borough of Greenwich policy that 3 yearly renewal DBS checks must be undertaken for all relevant employees. All DBS disclosure certificates must be viewed by a member of the ACL monitoring team as soon as individuals receive them so that the date of issue together with the documents reference number can be recorded on the ACL safeguarding Single Central Record. This register is password protected and only the Designated Safeguarding Lead for ACL in Greenwich has complete access to the information stored on it. All staff engaged in the delivery of the Royal Greenwich ACL programme must notify their employer of any changes in their DBS status, and this information must pass to the ACL team as soon as the partner is notified.

Completion of a DBS check for staff is the responsibility of the delivery partner. The cost of the check is also the responsibility of the partner, who must supply the ACL team with the date of all current disclosures.

The ACL team will review the safeguarding single central record at the start of each term or when organisations recruit new staff. This will enable the ACL team to highlight any gaps in information stored on the single central register.

All staff (Tutors, Centre Managers, Receptionists, Volunteers, Champions etc.) will need to be fully vetted which will entail a DBS check, a risk assessment, or a Children's Barred List if relevant, dependant on their role within the organisation.

All partners will need to address any gaps within a week of receiving notification from the ACL team.

The partner will need to give the ACL team weekly updates on any missing data and progress.

Partners will update the ACL team of training events and conferences attended at monitoring meetings.

Partners will send representatives to all ACL training and ensure information is cascaded to all staff delivering on the ACL funded programme,

Staff awareness of the RBG ACL Safeguarding Policy and Procedure Guidance will be spot checked by the RBG ACL team during monitoring meetings and learning walks.

Safeguarding Incidents and Complaints

All incidents known to the partner must be reported to the ACL team immediately

All incidents must be recorded by the partner and sent to the Designated Safeguarding Lead.

Head of Service to determine the appropriate action based on the seriousness of the incident, action could include

Exclusion

Suspension of the contract

Report incident to relevant authorities.

Accidents

It is the responsibility of the partner to maintain an incident/accident record which will be available for inspection at monitoring meetings, audits or when requested by the ACL team.

Serious incidents or accidents must be notified to the ACL team for immediate action.

The Designated Safeguarding Lead for ACL in R.B. Greenwich is Louise Severyn-Kosinska

Queries regarding ACL safeguarding procedures should be addressed to The Designated Safeguarding Lead louise.severyn-kosinska@royalgreenwich.gov.uk

For copies of Safeguarding Adults material and relevant posters contact louise.severyn-kosinska@royalgreenwich.gov.uk

The number for safeguarding concerns is 07805 708524

Appendix

Categories and definitions for safeguarding issues

Neglect The persistent or severe failure to meet an individual's physical and/or psychological needs. It will likely result in serious impairment of the person's health or development.

Domestic Abuse The Home Office Domestic abuse statutory guidance defines domestic abuse as the presence of abusive behaviour of a person towards another person, who are each aged 16 years or over and are 'personally connected' to each other, which may be a single incident or a course of conduct, and may consist of any of the following [NICE, 2014] [Home Office, 2023]:

Physical Abuse Causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. It may be done deliberately or recklessly or be the results of a deliberate failure to prevent injury occurring.

Sexual Abuse Involves an individual being forced or coerced into participating in or watching sexual activity. It is not necessary for the individual to be aware that the activity is sexual, and the apparent consent of a child, young person or vulnerable adult is irrelevant. Sexual abuse may not necessarily include physical activity such as choking but may involve video, photography, or 'grooming' (preparation for abuse).

Emotional Abuse Occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person or vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

Harassment In the Equality Act 2010 harassment is defined as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual', and this includes sexual harassment.

Bullying is not specifically defined in law, but may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient.

E-Safety encompasses all Internet technologies and electronic communications such as mobile phones as well as collaboration tools including the use of AI and personal publishing. It highlights the need to educate students about the risks of using technology and the benefits of fact checking sources, provides safeguards and

awareness for users to enable them to control their online experience.

Misinformation and disinformation, fake news and AI generated content, deepfake technology and the creation of manipulated images, audio or video open up the potential misuse of technology for bullying, exploitation, fraud and abuse. This is a pervasive global challenge, evolving in scope and sophistication. RBG ACL supports providers to embed critical thinking as a core skill into the curriculum with an awareness for different needs in order to build resilience and the safe and responsible use of generative AI tools.

Forced Marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual, and emotional pressure.

Honour-based violence The terms honour crime, honour-based violence or “izzat” embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment, and murder, where the person is being punished by their family or their community. They are being punished for allegedly undermining what the family or community believes to be the correct code of behaviour. In transgressing this code of conduct, the person is perceived as having brought “shame” or dishonour” to the family or community.

Female Genital Mutilation Female genital mutilation (FGM) sometimes referred to as female circumcision refers to procedures that intentionally alters or cause injury to the female genital organs for non-medical reasons. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. The practice is illegal in the UK.

The Home Office Domestic abuse statutory guidance defines a child as a victim of domestic abuse if the child sees, hears, or experiences the effect of, the abuse [Home Office, 2023].

Radicalisation Is the process by which people come to support terrorism and violent extremism and, in some cases, then to participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or single indicator of when a person might move to adopt violence in support of extremist ideas. Potential diagnostic indicators may include use of inappropriate language, possession of violent extremist literature, behavioural changes and so on. If members of staff do have concerns about a young person, they should seek advice from the Designated Safeguarding Lead immediately.