

Safeguarding Policy

Contents

1	Introduction & Purpose.....	3
1.1	Introduction	3
1.2	Purpose	3
2	Policy Overview & Scope.....	3
2.1	What is covered.....	3
2.2	Who the policies apply to.....	4
2.3	Definitions.....	4
3	Key Contacts	6
4	Our Responsibility.....	6
4.1	Senior Leadership Team	6
4.2	Vice Chancellor and Chief Executive.....	7
4.3	Designated Safeguarding Lead	7
4.4	Designated Safeguarding Officers.....	8
4.5	Personal Tutors/Lecturers/Apprenticeship Officers/Student Support/Careers/Personal Development Tutors/Library staff	8
4.6	The 5 R's procedure	8
4.7	Responding to a disclosure.....	9
4.8	Record Keeping.....	10
5	Key Principles and Aims.....	10
6	Key Strands of Activity	11
6.1	Safer Recruitment.....	11
6.2	Induction and Training.....	11
6.3	Safe learning	11
6.4	Safe environment	11
6.5	Accidents and incidents.....	11
6.6	Prevent Duty.....	12
6.7	External Speakers	12
6.8	Mental Health, Wellbeing, and Resilience.....	12

6.9 Providing Support 12

6.10 Safeguarding students 13

6.11 Allegations against staff..... 13

6.12 Allegations against employers 13

6.13 Confidentiality..... 13

6.14 Supporting staff..... 14

7 Law and Guidance..... 14

8 Policy Review 15

9 Dissemination 15

10 Related Policies and Guidance..... 15

11 Disclaimer 15

Appendix 1- Recording Form.....16

Appendix 2 – Safeguarding Process.....17

Appendix 3 -High Risk Staff Allegations process18

Appendix 4 – Allegations relating to apprentices’ employer19

1 Introduction & Purpose

1.1 Introduction

All employees at Walbrook Institute London [“Walbrook”] have a crucial role to play in shaping the lives of students that study with us. Safeguarding is a term used to communicate the duties and responsibilities of those working in education to protect individuals from harm and ensure they feel safe. Staff who work with students and apprentices have a unique opportunity to interact in ways that promote awareness of welfare, safety, and empowerment.

1.2 Purpose

This policy covers safeguarding of children and adults at risk for Walbrook and aims to ensure that all involved are aware of and understand their responsibilities, the responsibilities of others, signs of safeguarding issues and the reporting procedure for all safeguarding issues.

2 Policy Overview & Scope

2.1 What is covered

This safeguarding policy covers all students regardless of location and covers all aspects of the programmes we offer including apprenticeships. All Walbrook staff must take responsibility for understanding their role in safeguarding across all aspects of our provision. This includes understanding their responsibility to report all concerns and ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and how to seek help.

It is inclusive of specific highlighted safeguarding agenda areas, as defined by law, and specified in ‘Keeping Children Safe in Education (2024)’ and in the wider context of all students and apprentices. This policy is influenced by and aligns with requirements set out in ‘The Education Act (2002) section 175’ and ‘Working Together to Safeguard Children (December 2023)’.

This policy also aligns with the government ‘Counter Terrorism and Security Act 2015’ that places a duty upon all education providers to have regard for the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider government ‘CONTEST’ counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists.
- Pursue terrorism – disrupt and stop terror attacks.
- Protect against terrorism – strengthen UK protection.
- Prepare to deal with terrorism – mitigate impact of attacks that can’t be stopped.

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Walbrook has a separate Prevent Policy providing more detail in relation to how it meets the Prevent Duty : [Prevent Duty Guidelines](#).

2.2 Who the policies apply to

The policy applies to all staff, including senior managers and the board of governors, paid staff, volunteers and part-time workers, agency staff, students, apprentices and anyone working on behalf of Walbrook.

2.3 Definitions

Safeguarding covers a wider variety of activities, behaviours and situations that could potentially lead to harm or abuse, that includes:

- Abuse (physical, exploitation, emotional, financial, institutional, sexual, and organisational)
- Breast ironing
- Bullying and cyberbullying
- Child sexual exploitation
- Cybercrime
- Discrimination
- Domestic abuse, including what children see, hear or experience.
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gang and youth violence
- Gender based violence
- Mental health concerns
- Peer on Peer abuse, including Sexual Harassment
- Private fostering
- Radicalisation
- Relationship abuse, including teenage relationship abuse
- Self-neglect

- Sexting
- Sexual violence and sexual harassment, including child on child abuse
- Substance misuse
- Trafficking and modern slavery
- unexplainable and or/persistent absences from education

Alongside the Safeguarding Agenda risks detailed above, this could be as a result of but not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Is or has been supported by a social worker
- Receiving a welfare service to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

The definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that that students can be temporally vulnerable due to change in circumstances or due to poor mental health. A person may also be deemed at higher risk of a safeguarding issue affecting them due to other factors.

This is termed contextual safeguarding. These areas should be considered thoroughly in relation to need for early help interventions. Examples of areas to consider are:

- Poor numeracy and literacy skill, or specific learning need
- English not a first language
- Unsupportive employer
- Under-represented group
- Children questioning their gender
- Acting as a carer for another family member
- Background in offending or is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Has a disability or social need
- Has special educational needs (inside or outside of a statutory Education, Health and Care Plan)
- Lives 'In Care' or has recently transitioned out of 'Care'

- Is a young carer
- Is frequently missing/goes missing from care or from home
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse or generally unsupportive.
- A number of groups of students have been identified as being more vulnerable, and each have proportionate measures in place to ensure the students are fully supported. These include students on an EHCP, coach core students and in care students
- Coming from a Pupil Referral Unit Or been subject to multiple suspensions/exclusion
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- Is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage, is a privately fostered child.

3 Key Contacts

The Safeguarding team can be contacted during office hours on the details below:
safeguarding@Walbrook.ac.uk

Designated Safeguarding Lead: Alan Wilson Email: awilson@Walbrook.ac.uk

Telephone: 020 7337 6290

Designated Safeguarding Officer: Hayley Cooper hcooper@Walbrook.ac.uk

Designated Safeguarding Officer: Roseline Sele rsele@Walbrook.ac.uk

If a person is at immediate risk of harm call 999 and ask for the police

4 Our Responsibility

4.1 Senior Leadership Team

- Be knowledgeable about safeguarding and to ensure we have effective policies to receive reports on safeguarding at each board meeting.
- Be aware that the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- To create a culture where all students and staff can speak out or share their concerns.

4.2 Vice Chancellor and Chief Executive

- Ensure that policies are implemented and followed, and that sufficient time and resources are allocated to employees in order that they can carry out their responsibilities.

4.3 Designated Safeguarding Lead

- Maintain links with:
 - local multi-agency safeguarding partners (local authorities, chief of police, and clinical commissioning groups)
 - Prevent Coordinators.
- Inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality assurance and standardisation for the designated safeguarding officer team.
- Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies where appropriate.
- Support and coordinate escalation process.
- Overall management of safeguarding issues and report to the Professional Education and Skills Board [PESB] on any issues that arise.
- Review procedures and policies on a timely basis. Maintain own CPD to ensure their role can be fulfilled
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Participate in strategy discussions and inter-agency meetings, and/or support other staff to do so in their absence.
- Lead on policy and training, making referrals to external agencies such as Local Authority children's social care/Channel/ Police and DBS.
- Have awareness of those students that are in need and how their education is impacted and progressing; this includes children allocated a social worker where this has been alerted to Walbrook, acknowledging the risk to these students could be higher, and ensuring support is in place.
- Pass information where relevant to a student's new training provider if they transfer from a Walbrook programme.
- Support Walbrook's mental health lead for both students and employees when informed of issues.
- Oversee information security for safeguarding including monitoring web filtering systems for both employee and students.
- The Designated Safeguarding Lead will nominate and ensure that a Deputy Designated Safeguarding Lead is in place and trained to the same level.

- Ensure all records are detailed, accurate, secure and include the rationale for all decisions. This should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent program etc

4.4 Designated Safeguarding Officers

- Deal with concerns raised over students’ welfare, signposting where required and offering guidance.
- Carry out investigations where appropriate into reported welfare concerns and liaise with external bodies such as Regional Prevent Coordinators, local multi-agency safeguarding partnerships (which constitute local authorities, chief officers of police, clinical commissioning groups) where appropriate.
- Maintain own CPD to ensure their role can be fulfilled competently and seek guidance where appropriate.
- Monitor the safeguarding@Walbrook.ac.uk inbox twice daily and ensure that all concerns are allocated to a Designated Safeguarding Officer within 24 hours.

4.5 Personal Tutors/Lecturers/Apprenticeship Officers/Student Support/Careers/Personal Development Tutors/Library staff

- Our Personal Tutors/Lecturers/Personal Development Tutors/Student Support/Careers/Library staff create a culture where young people can speak out or share their concerns.
- Check safety and welfare of all students at each visit/communication, ensuring students complete all safety-related learning activities within their programme.
- Be aware of indicators and identify where there may be a safeguarding issue – and if required to, follow the 5 R procedure, using Appendix 1.

4.6 The 5 R’s procedure

Recognise

Staff supporting children and vulnerable adults should have a clear and definite understanding of the signs of potential abuse, harm and neglect. Symptoms of abuse are not always visible, and suspicious injuries or behaviours should not be dismissed.

Those surrounding individuals must adopt an understanding of suspicious and non-suspicious behaviour and injury when considering their safeguarding duty.

Trusting your instinct and treating every concern as an issue is always best. Recognising that the person is vulnerable and then spotting the signs of abuse is often the first step in safeguarding adults and children effectively. This step sets the stage for taking further action.

Respond

If a safeguarding issue has been detected, responding to it in an appropriate manner is vital. Some children and vulnerable adults who have fallen victim to abuse and neglect will most likely need to be handled with great care and caution.

You should approach these individuals in a calm fashion and foresee that they may not be willing to talk about their situation. If they wish to discuss matters, ask open

questions, which will encourage them to give just enough information to validate the claim.

Once you have enough information to solidify it beyond suspicion, you should begin reporting. Responding appropriately ensures that the situation is acknowledged and addressed promptly, preventing further harm.

Report

Walbrook has a team responsible for safeguarding issues who will deal with all reports submitted. By understanding the 5 R's of safeguarding, all staff will understand the importance of reporting concerns immediately.

Another important factor in ensuring the safety and security of others is knowing who your closest safeguarding officer/lead is. You should report any concerns that may have arisen to the DSO/DSL and they will then take responsibility for dealing with the matter.

Reporting is a crucial step in escalating concerns to those with the authority and knowledge to take further action.

Record

Recording the incident in the best detail is extremely important for the investigation. You should take precise and comprehensive notes of the situation to assist in your report and relay these where necessary.

Included in the notes should be the who, what, why, when and where of safeguarding. Details of who was involved are especially important, as well as dates and times. The recording of the events should take place as soon as possible.

Keeping detailed records ensures there is an accurate account of what happened, which can be invaluable during an investigation, a form to support this can be found in Appendix 1

Refer

After the previous steps, the report should be referred to the appropriate authorities to continue the investigation. Referring is the final step of the 5 R's of safeguarding and ensures the issue is handled by professionals equipped to investigate and resolve it.

If you believe the safeguarding risk to be more urgent, such as a suspicion that somebody is under immediate or severe threat, you should contact the relevant authority immediately, whether this is the police, fire service or ambulance. Referrals ensure that the safeguarding concern is addressed effectively and promptly, minimising potential harm to the individual

4.7 Responding to a disclosure

- React calmly
- Assure the child/vulnerable adult they are not at fault
- Take any disclosure from the child/vulnerable adult seriously
- Keep questions to a minimum and only ask open questions.
- Maintain confidentiality but do not make promises you may be unable to keep.

- Explain to the child/vulnerable adult that you may need to share your concerns with someone in a position to act and that you cannot keep safeguarding concerns a secret.
- Make a full written record of what has been said, heard and/or seen as soon as possible (see 4.8 Record Keeping) and Appendix 1

4.8 Record Keeping

- Record the date, time and the place where the disclosure took place
- Record the key words and phrases used – do not interpret the individual's words.
- Records should be written as soon as possible after the incident or disclosure and no later than 24 hours after the point.
- Written records should be shown to the child/vulnerable adult if possible and they should be asked to check for accuracy
- The completed form (Appendix 1) should be sent to the Designated Safeguarding Lead/Officer

5 Key Principles and Aims

- All people are treated with respect and courtesy by staff, students and apprentices in an environment free from harassment or discrimination.
- All learning environments, communal areas, facilities, and equipment comply with legislative health and safety standards.
- Walbrook works with students, apprentices and agencies to promote a safe and healthy culture.
- Walbrook develops partnerships to proactively protect students and apprentices at risk of abuse, neglect or at risk of radicalisation.
- Staff are trained and have a clear understanding of personal safety and good safeguarding practices, as well as what factors may make students and apprentices vulnerable to a range of safeguarding concerns.
- Staff are trained to check the safety and welfare of all students & apprentices and report all concerns to the designated safeguarding officers.
- Walbrook works with students to promote their health, well-being and safety including their safety online.
- Walbrook supports individuals to develop in a way that increases their confidence, personal resilience, and independence and empowers them to make informed choices about their safety and well-being.
- Walbrook works proactively to raise awareness of radicalisation and extremism to prevent people from being drawn into terrorism.
- Walbrook staff will support students to receive confidential advice, guidance, and support for a range of issues they may face, including signposting to external agencies where specialist support is required.

- The designated safeguarding team use systematic monitoring to support students and reduce the risk of harm or abuse.
- Walbrook follow safer recruitment practices ensuring all appropriate checks are carried out on new staff and as required for existing staff.

6 Key Strands of Activity

6.1 Safer Recruitment

Walbrook complies with best practices in recruiting and training its staff, in line with legislative requirements. All staff undergo the appropriate pre-employment checks including DBS checks appropriate for their role.

6.2 Induction and Training

All Walbrook staff undertake mandatory safeguarding training appropriate to their role. They understand the principles of the Walbrook Code of Conduct, as outlined in the staff handbook and safe working practices, as outlined in the Walbrook Health and Safety Policy. This includes how to keep themselves and the students safe by not putting themselves in compromising situations.

All new starters receive appropriate induction, including safeguarding training, which covers the signs and indicators of abuse, neglect, bullying and/or harassment and how to respond to an individual that discloses welfare issues, abuse, neglect, bullying and/or harassment quickly, sensitively, and appropriately.

6.3 Safe learning

The 'Keeping Children Safe in Education' principles and safeguarding agendas are embedded within Walbrook's teaching and learning practices and our quality assurance and quality improvement processes. We engage with students on issues related to current affairs, financial health, well-being, physical health, and life in modern Britain to promote opportunities and help students to achieve their potential.

6.4 Safe environment

Walbrook provides a safe learning environment for all students, whilst at the same time being friendly and welcoming. All Walbrook staff wear their identification badges with a Walbrook lanyard when they are on campus or representing the Walbrook in person externally. We promote a culture of respect and courtesy, in an environment free from harassment or discrimination.

Walbrook complies with legislative requirements for Health and Safety and recognises its duty to ensure that employers are suitably positioned to support apprentices and provide a safe working environment. Walbrook completes health and safety checks of all apprentice's workplaces before enrolling them on a programme and continues to monitor this through regular progress reviews with the apprentice and employer.

6.5 Accidents and incidents

All accidents and incidents whether at Walbrook's premises or an Apprentice's workplace must be recorded. If the accidents and incidents occurred in the

apprentice's workplace, the overall responsibility to investigate lies with the employer, Walbrook will however still investigate the incident.

If the incident took place out of the workplace whilst under the supervision of Walbrook staff, we have overall responsibility to investigate.

6.6 Prevent Duty

Walbrook has legal obligations under the Counter Terrorism and Security Act 2015. All staff are trained to understand their duties under the Government's Prevent strategy and detailed in the Walbrook Prevent Policy, risk assessments and action plan. Walbrook has robust processes in place for reporting concerns about students or staff who might be at risk of being drawn into extremism or being radicalised.

Students will be encouraged to explore and discuss issues with their personal tutor/Student Support Team in a safe and open environment.

6.7 External Speakers

In the interest of safeguarding our students, Walbrook must ensure external speakers and the material they will be presenting do not promote extremism, incite radicalisation or be offensive in any way when delivering the programme or additional learning to our students.

The Visiting Speaker Risk Assessment must be completed by the event organiser and checked prior to the event by the DSL/DSO

6.8 Mental Health, Wellbeing, and Resilience

Walbrook recognises the importance of supporting positive well-being and building resilience to enable people to reach their full potential. We will engage students in activities embedded in their programme to increase their understanding of the steps they can take to help to increase their well-being. Students can discuss concerns with their personal tutor or seek further support from the safeguarding team.

6.9 Providing Support

Walbrook recognises that an individual who is abused or witnesses domestic violence/abuse may find it difficult to develop and maintain a sense of self-worth, that in these circumstances they may feel helpless and humiliated, and they may feel self-blame. This can mean the individual displays a variety of behaviours that might range from behaviour which is perceived to be normal to being aggressive or withdrawn.

It is therefore important for Walbrook's staff to record precisely what has been alleged/witnessed, using the words of the complainant and factual observations about the observable physical and emotional state of the individual sharing their concerns or the situation witnessed. This information should be recorded and shared in the secure safeguarding folder on SharePoint which complies with the confidentiality requirements and can only be accessed by those who need to access it.

This might be as part of an investigation, or action taken to resolve a complaint/allegation.

Walbrook can provide a comprehensive list of external agencies and protection services that are able to provide expertise on a variety of safeguarding and welfare issues

6.10 Safeguarding students

Walbrook has a legal obligation to protect young people and vulnerable adults from abuse and recognises that we can play a significant part in raising awareness among all students to prevent harm and support them to make positive choices in life.

Walbrook staff are trained to provide information, advice and guidance on a range of topics and to reduce the risk of harm by providing good lines of communication as trusted adults. The staff are supported by an appropriately trained Designated Safeguarding Lead and Designated Safeguarding Officers, who form a 'safeguarding team'.

All staff ensure that disclosures made by students are dealt with quickly, sensitively, and appropriately.

All staff are trained in the appropriate response to a student's disclosure and the correct procedure for dealing with concerns about a student (Appendix 2). This process is regularly updated to allow for new information and processes to be put in place as and when appropriately required. Teams work with students to proactively protect them from abuse and neglect and prevent students from being placed in an abusive situation.

6.11 Allegations against staff

Walbrook follows the current guidance and procedures set out for managing safeguarding allegations or concerns against teaching staff, other staff, volunteers and contractors. These requirements are implemented within the Walbrook procedure. If a member of staff.

Volunteer or contractor is identified in an allegation deemed to be a high-risk situation, follow the process outlined in Appendix 3.

6.12 Allegations against employers

Walbrook follows the current guidance and procedures set out for managing safeguarding allegations or concerns against staff employed by the organisation for which the apprentice is working. If a concern is raised about a member of staff employed by the apprentice's employer, the process detailed in Appendix 4 should be followed.

6.13 Confidentiality

Walbrook recognises that all matters relating to children and vulnerable adults' welfare and safeguarding are highly confidential. The staff have a professional responsibility to report all concerns to the Safeguarding Team via a designated safeguarding officer. The Safeguarding team will only share information with other members of staff, external agencies or the apprentice's employer on a 'need to know' basis.

All records, such as Concern reports and referral letters, will be stored electronically in the secure safeguarding folder. There must not be any records stored using other methods for example on a hard drive or memory stick.

6.14 Supporting staff

Walbrook recognises that staff who have become involved with a child or vulnerable person who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support all staff by providing an opportunity to talk through their experience with a Designated Person who can seek further support if this is needed.

Staff are also reminded that they can access the VLE (Brightspace) for resources from the Wellbeing team.

7 Law and Guidance

This policy has been written and will be implemented in line with the safeguarding and child protection procedures and in accordance with legislation and related guidance.

- Keeping Children Safe in Education ([Latest Version](#))
- [Advice for Practitioners Providing Safeguarding](#)
- [Apprenticeships, Skills, Children and Learning Act 2009](#)
- Behaviours in Schools ([Latest Version](#))
- Counter Terrorism and Security Act ([Latest Version](#))
- Early Years Inspection Handbook ([Latest Version](#))
- [Education and Training \(Welfare of Children\) Act 2021](#)
- [Education for a Connected World](#)
- Education inspection framework Handbook ([Latest Version](#))
- [Female Genital Mutilation Act 2003](#)
- [Harmful online challenges and hoaxes](#)
- [Human Rights Act](#)
- [Local Safeguarding Arrangements Guidance](#)
- [Making Referrals to the DBS](#)
- [Mental Capacity Act](#)
- [Modern Slavery Act](#)
- [Online Safety Act](#)
- [Recruiting Teachers from Overseas](#)
- [Safeguarding and Remote Education](#)
- Serious Crime Act ([Latest Version](#))
- [Sexual Offences Act](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Skills and Post-16 Education Act 2022](#)

- [The Care Act](#)
- [The Children Act](#)
- [The Data Protection Act](#)
- [The Equality Act](#)
- [The Role of the LADO](#)
- [Using external expertise to enhance online safety education](#)
- [What to do if you're worried a child is being abused 2015](#)
- [When to Call the Police](#)
- Working Together to Safeguard Children ([Latest Version](#))
- [Education Act 2002](#)

8 Policy Review

This Policy is to be reviewed annually.

9 Dissemination

The Policy is available for current and potential clients and students to view.

10 Related Policies and Guidance

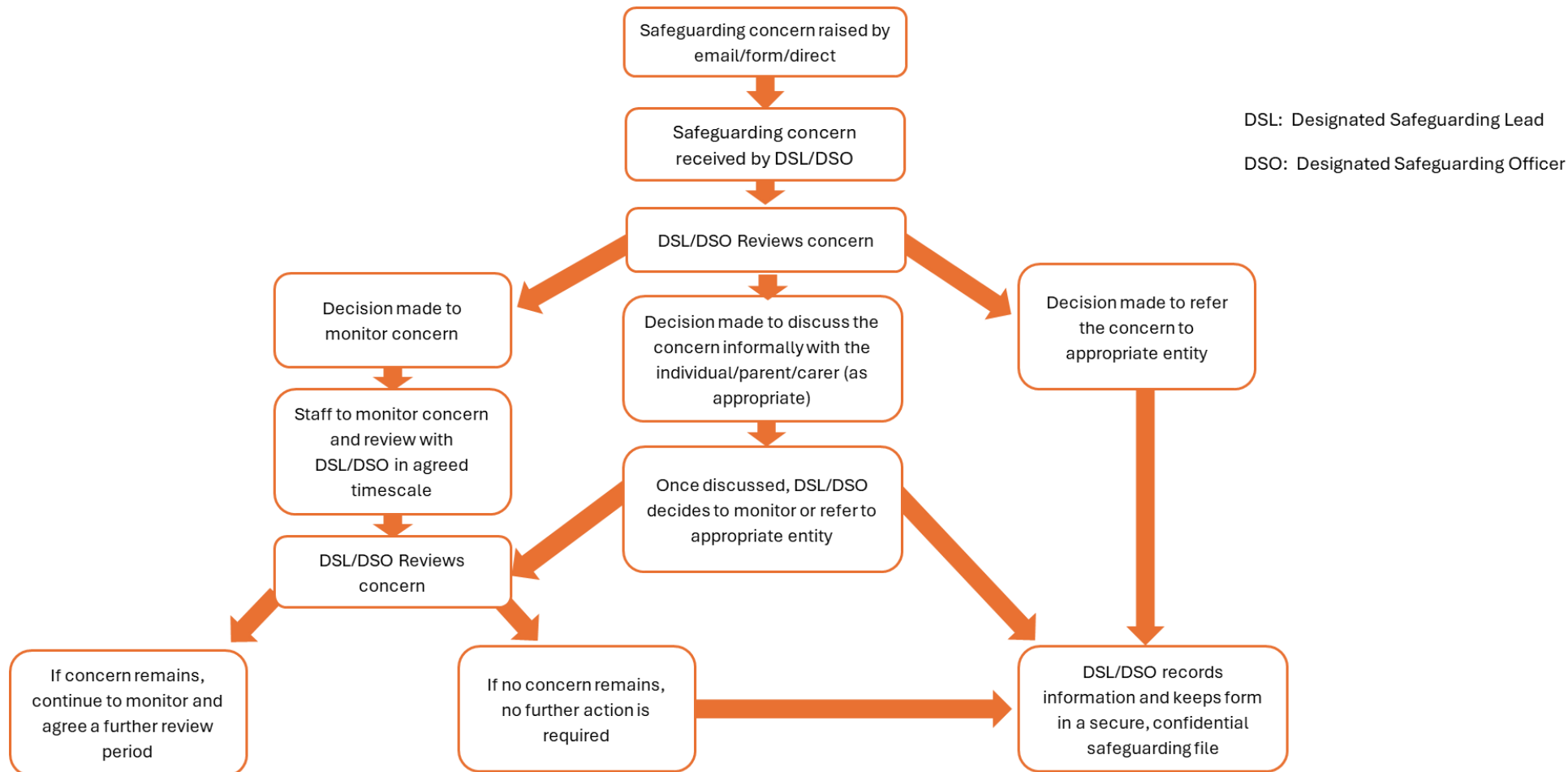
- Prevent Duty Policy
- Safer Recruitment Policy
- IT Acceptable Use Policy
- Visiting Speakers Policy
- Keeping Children Safe in Education
- Freedom of Speech Code of Practice

11 Disclaimer

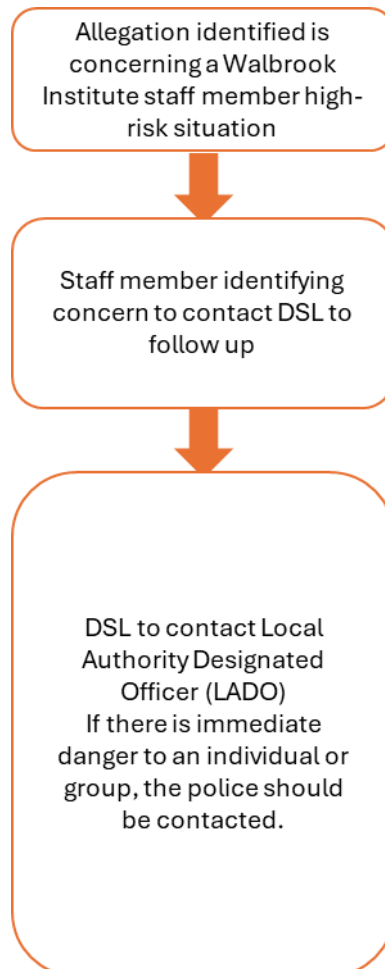
Walbrook reserve the right to amend the Safeguarding Policy at any time to comply with new legislation, guidance and lessons learnt.

Document Control	
Version:	1.1
Approved by:	Senior Leadership Committee
Originator/Author:	Head of Apprenticeships (Designated Safeguarding Lead)
Policy Owner:	Head of Apprenticeships (Designated Safeguarding Lead)
Date approved:	23 January 2026
Effective from:	January 2026
Review date:	January 2027
Updates:	

Appendix 2 – Safeguarding Process



Appendix 3 -High Risk Staff Allegations process



Appendix 4 – Allegations relating to apprentices’ employer

