



ADULT SKILLS AND EDUCATION SERVICE

SAFEGUARDING/ PREVENT POLICY

**ADULT SKILLS AND EDUCATION
THE CITY OF LONDON
CORPORATION
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Safeguarding young people and adults / Prevent policy

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City of London Corporation Safeguarding Leads			
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Ian Tweedie	Adult Social Care Manager	202 7332 3129	ian.tweedie@cityoflondon.gov.uk
PREVENT Lead			
Valeria Cadena	Community Safety Manager	020 7332 1272	Valeria.cadena@cityoflondon.gov.uk
Police and Prevent contacts			
Sadik Miah	Community Policing City of London Police	020 7601 2222 17903 305166 or dial 999	sadik.miah@city-of-london.police.uk
Confidential anti- terrorist hotline	Counter-terrorism security advisers	0800 789321	CTS@city-of-london.police.uk
Department for Education contact to raise concerns about extremism			
Helpline		020 7340 7264	counter.extremism@education.gsi.gov.uk

1) Safeguarding in the City of London Corporation

Safeguarding is the statutory requirement to promote the welfare of children and adults at risk, protecting them from harm and neglect including self-harm and self-neglect. It is a duty of the City of London Corporation (City Corporation) to ensure that children and adults are safeguarded from harm. Every employee of the City Corporation has a responsibility to safeguard the welfare of children, young people and adults at risk, whatever the role of the individual, or the City Corporation service or department they work in. The City Corporation's safeguarding policy provides guidance for all City Corporation staff, members and individuals, consultants and agencies contracted by the City Corporation who may come across concerns regarding the safeguarding and protection of children, young people and adults at risk within the context of their work.

2) The purpose of this policy document

This policy document updates previous versions of the policy and highlights the extension of the Prevent guidance to include a greater focus on protecting learners from increasing levels of extremism in all its forms, including hate crimes, and threats to groups with protected characteristics such as aspects of gender. It also identifies the increasing prevalence of challenges to mental health, following the COVID pandemic.

The updated document provides guidance to ASES staff about their roles and responsibilities in relation to the protection of children and adults at risk in the range of different settings where our learners study. Learners within all of the safeguarded groups face the risk of abuse. It is the duty of every member of staff to prevent abuse and to take effective action when abuse is suspected or disclosed. Safeguarding incidents could happen anywhere and at any time and could be perpetrated by a range of individuals including staff, other learners and individuals external to the Service, including family and friends and carers.

An additional purpose of this document is to clarify the responsibilities of all staff and steering group members. It sets out what members of staff should do if they have any safeguarding concerns. Page 2 of this document lists the names and details of safeguarding staff and the contacts in the City Corporation.

It is the responsibility of all employees to be alert to possible indicators of abuse and to raise concerns to a Designated Safeguarding Officer. See Annex 1 for the ASES reporting pro-forma.

This policy has been developed in accordance with the principles established in the following statutory and guidance documents:

- ❖ Children Act 1989
- ❖ Safeguarding Vulnerable Groups Act 2006
- ❖ Care Act 2014
- ❖ Mental Capacity Act 2005
- ❖ Working Together to Safeguard Children, HM Gov, 2023
- ❖ Keeping Children Safe in Education, DfE, 2025
- ❖ Inspecting Safeguarding in Early Years, Education and Skills Settings 2018 Ofsted Counter Terrorism and Security Act 2017
- ❖ Prevent Duty Guidance for FE & Skills Providers (latest HM Gov guidance)
- ❖ City of London Corporation Safeguarding Policy 2020
- ❖ Work-based learners and the Prevent statutory duty guidance for providers, September 2018, DfE

ASES will have available for reference, where appropriate, such as in Family Learning settings:
Departmental advice:

[‘What to do if you are worried a child is being abused- advice for practitioners’ 2015](#)

[Keeping Children Safe in Education 2025](#)

Cross reference to:

ASES Equality and Diversity policy

ASES Health and Safety policy

ASES Family Learning Policy

3) Adult Skills and Education Service (ASES)

As its contribution to the City Corporation strategies, the adult education curriculum is focused on:

- providing those who are economically active but unemployed with the knowledge and skills to gain sustainable employment through the development of their English, mathematics, ICT and employability skills
- providing those with low levels of English and mathematics skills to develop these skills, which allows them to progress in their own lives and support the learning of their children
- supporting those who are economically inactive to develop their physical and mental resilience to maintain their health and independence
- providing training and supporting apprenticeships, mainly for 16-18 year olds, delivered in-house and through sub-contractors, at qualification levels, 2,3 and 4.

Apprentices employed by the City Corporation and trained by them are completely covered by the City Corporation's Safeguarding Policy. Apprentices employed by the City Corporation but trained by an external organisation are covered by both the City Corporation's Safeguarding Policy and by that of the external training organisation they attend. Apprentices employed by external organisations but trained by ASES are covered both by the safeguarding policy of their employer and by that of the City Corporation.

4) The aims of ASES safeguarding and adults at risk policy

Safeguarding encompasses a range of activities aimed at protecting an adult, child or young person's welfare and right to live, work and learn safely and free from abuse and neglect. This Policy aims:

- To provide a safe environment for children and adults at risk in which to learn
- To ensure the safe recruitment of staff and the maintenance of a single central record
- To protect children and adults from harm by identifying those at risk and taking action to ensure they are kept safe
- To protect learners by assessing risk in relation to all activities, including a focus on the prevention of being drawn into radicalism, extremism and activities such as substance abuse, knife crime and County Lines
- To provide guidance for staff on the implementation of safeguarding measures and on the internal procedures to be followed in cases of suspected abuse
- To promote understanding and build relationships by working with the Corporation and other agencies in order to develop multi- agency working and information sharing
- To establish procedures for monitoring and evaluating the effectiveness of the safeguarding arrangements.

5) Safeguarding children and adults at risk

The Children Act 1989 and 2004, updated by the Care Act 2014 defines a child as a person up to their 18th birthday and up to 25 years for those with special education needs and disabilities (SEND). Young people or learners includes those upto 25 years. An 'adult at risk' is any person who is aged 18 years or over and at risk of abuse or neglect because of their need for care and or support and because they are not able to protect themselves from harm or significant exploitation.

6) Safeguarding children/young people

Safeguarding and promoting the welfare of children/ young people is defined as:

- protection from maltreatment
- preventing impairment of children's / young people's health or development
- ensuring that children / young are growing up in circumstances consistent with the provision of safe and effective care and support.
- taking action to enable all children to have the best outcomes.

7) The kinds of harms that can be experienced by young learners and adults at risk:

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- hate crimes, such as racist, disablist, misogynistic, homophobic or transphobic abuse
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- the impact of digital technologies on sexual behaviour, such as sexting
- teenage relationship abuse, including peer on peer abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity, County Lines and drug-related activity
- domestic violence
- female genital mutilation (FGM) *
- forced marriage
- fabricated or induced illness
- declining mental health
- poor parenting
- other issues not listed here but that pose a risk to children, young people and adults.
- modern slavery
- criminal exploitation

This list is not exhaustive and other risks may be having an impact.

*** NOTE: FGM mandatory duty for all staff in educational setting**

Teachers and other professionals must personally report to the police where they discover that an act of FGM appears to have been carried on a young person up to the age of 18. Where a learner is over 18, the concern should be raised through the usual safeguarding arrangements. (see page 162/3 of the KCSIE 2025 for more detail).

All members of staff are required to acquaint themselves with the most recent version of the DfE's Keeping Children Safe in Education legislation which identifies in greater detail different types of abuse, risks and harms.

8) Additional Specific Responsibilities

Sexual harassment is unwanted sexual behaviour that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Anything that is unwelcome to an individual is unwanted. That individual doesn't need to have objected to it before.

If the unwanted behaviour violates an individual's dignity, or creates a degrading, humiliating, hostile, intimidating or offensive environment for them then it is classified as harassment. It doesn't matter if the person committing harassment didn't intend to do it, for example workplace banter, it's the impact that it has on the harassed individual that counts.

Sexual harassment is against the law and has no place in the workplace.

Sexually harassing behaviours can include:

- sexual comments or jokes
- the display or circulation of pornography
- displaying sexually graphic pictures, posters, or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- requests or demands for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact on social media
- spreading sexual rumours about a person
- sending sexually explicit emails or text messages, and
- unwelcome touching, hugging, massaging, or kissing.

Victimisation is defined as treating a worker badly because they have reported sexual harassment at work, it is believed they will report a case of sexual harassment in the future or a person has helped someone else to report a case of sexual harassment.

Treating a worker badly can include, but is not limited to:

- dismissing a worker
- excluding a worker from tasks, projects, meetings, or day to day work
- unfair criticism of work

- denying a worker, a promotion or development opportunity
- denying a worker shift hour
- telling other companies to not hire someone due to their reporting of sexual harassment.

If an individual has been sexually harassed, experienced sexual violence or witness sexual harassment or violence, and wishes to talk to someone in confidence, anonymously they can contact:

For women:

- National Sexual Violence Helpline: 0808 802 9999
- Women’s Aid Federation – www.womensaid.org.uk / 08457 023 047

LGBT specialist support

- Galop – www.galop.org.uk / 0800 999 5428

Men’s specialist support

- Survivors UK – www.survivorsuk.org

9) The Prevent Duty

The Prevent duty contributes to the government’s strategy to reduce the risk to the UK, and its interests overseas, from terrorism, so that people can go about their daily lives freely with confidence. The duty requires educational establishments to have regard to the need to prevent people from being drawn into terrorism, by reducing the risks of radicalisation and ensure individuals are provided advice and support.

Radicalisation is the process whereby a person comes to support extremist views, and is drawn into activity such as terrorism or hate crimes, which in this context is seen as opposition to fundamental British values, defined as:

- ❖ The rule of Law
- ❖ Democracy
- ❖ Individual liberty
- ❖ Mutual respect
- ❖ Tolerance of different faiths and beliefs

CHANNEL

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism, through contact with a local Channel and Prevent coordinator.

The contact details for referrals within the corporation are provided on page 2 of this policy document.

The revised Prevent Duty Guidance (DfE 2019) summarises the **requirements** of colleges in terms of the main following general themes:

- The development of a risk assessment that includes all settings, identifying specific harms such as the prevalence of local criminal activity including knife crimes, county lines and drug abuse.
- Close partnerships with Prevent co-ordinators (contact details are on page 2 of this document).
- Staff training to ensure governors, principals, leaders and staff use opportunities in the curriculum to educate learners about British values, and have particular regard to the protected characteristics of learners as identified in the Equality Act 2010.
- Policy to provide welfare and mental health support to learners
- An IT policy to use filtering and other measures to prevent learners being drawn into terrorism or hate crimes

10) Mental Capacity

Guidance to colleges in Keeping Children Safe in Education (section 41) identifies the requirement to have regard to the Mental Capacity Act, 2005. If in doubt about a learner's capacity to make decisions, for example as a result of extreme temporary anxiety, or temporary psychotic episodes, arrangements should be made for an assessment of the extent to which a learner lacks sufficient mental capacity. This should be arranged through the local authority Adult Social Care team (via the Designated Safeguarding Lead).

11) Responsibilities of the ASES Steering Group

- The ASES steering group identifies a designated member with specific responsibilities for the safeguarding of young people and adults at risk and the Prevent Duty
- The steering group identifies a deputy in the case of absence of designated lead
- The designated member and other members receive safeguarding and Prevent training, updated annually.
- The designated member liaises with the Principal and the Designated Safeguarding Lead over matters regarding safeguarding young people and adults at risk to ensure that:
 - the Service has guidelines and policies for children/young people and adults at risk which are consistent with safeguarding, health and safety and Prevent duty statutory requirements.
 - The Service follows safer recruitment practices.
 - The steering receives a monitoring report at each meeting, which includes an incidents report
 - the steering group reviews the Service safeguarding and Prevent policy on an annual basis
 - the steering group liaises with, and reports to the main Corporation Board.
 - If appropriate, steering group members engage with tutors and learners and report back to the board.

12) Responsibilities of ASES senior staff

ASES senior staff should ensure that:

- they have put in place a strong, robust and proactive response to safeguarding and Prevent duty requirements, ensuring policies are up to date
- they have appointed a senior staff member as the Lead Designated Safeguarding Officer, with a deputy in case of staff absence
- all Designated Safeguarding Officers are trained to the appropriate level, and updated at least once a year
- they receive annual, updated safeguarding young people and adults at risk and Prevent training. A central record of completed training by all staff will be held and maintained by the Team Administrator to ensure full compliance annually
- all staff who have contact with learners, including IAG officers, additional support staff, welfare officers, tutors

and assessors are required to acquaint themselves with the key safeguarding documents, and receive relevant updates.

- they have put in place effective safeguarding and staff response to incidents arrangements, that are well understood by everyone in the setting.
- they have arrangements in place to monitor the effectiveness of the safeguarding, health and safety and Prevent policies they prepare a safeguarding and Prevent monitoring report to each meeting of the ASES steering group
- they arrange for support to ASES staff members of staff who have been distressed by a safeguarding case.
- they have put in place arrangements which set out clearly the processes for sharing information with other multi-agency professionals including the Local Safeguarding Children Board or the Local Safeguarding Adults Board, as appropriate.
- they have an agreement with the City Corporation for assessment under the Mental Capacity Act, for any learner who may lack capacity to make decisions.
- tutors and assessors receive guidance and training to enable them to integrate aspects of the Prevent duty into their learning programmes.
- tutors and assessors receive guidance about the possible consequences of another pandemic for the mental health and well-being of learners, particularly the most vulnerable.
- tutors and assessors know how to reinforce digital safety measures.
- health and safety procedures are followed in all settings, including in particular, the different contexts for the apprenticeship programmes.

13) Responsibilities of ASES designated safeguarding officers

ASES designated safeguarding officers should ensure that:

- learners know how to raise safeguarding issues and understand the process for doing so
- learners know that they will be listened to, and that their concerns will be taken seriously
- staff in all settings have had appropriate, up to date training in safeguarding, health and safety and Prevent and that records of training and attendance are maintained
- the single central record of DBS and pre-appointment checks is up-to-date and accurate, including subcontractors' practice
- action taken in response to any safeguarding concerns, is effective and in line with ASES and City Corporation guidelines
- ASES staff are advised appropriately about multiagency partner contacts in other authorities in order to prevent learners from further harm. These include Channel arrangements.
- any allegation of abuse made against a tutor or other member of staff or volunteer is responded to quickly, in a fair and consistent way that provides effective protection for the learner and at the same time supports the person who is the subject of the allegation.
- Records are kept of any young people or adults identified as at risk and any actions taken are recorded and monitored.

14) Responsibilities of ASES tutors and assessors

ASES Tutors and assessors should:

- fully comply with the Service's safeguarding and Prevent procedures by reporting all concerns or possible indicators of abuse to an ASES Designated Safeguarding Officer

- attend all safeguarding on-line or face to face safeguarding training events
- acquaint themselves with the most recent safeguarding and Prevent guidelines, and documents, and any subsequent updates; these will be distributed via the Safeguarding team
- fully comply with the Service's health and safety policies and procedures, including advising their line manager of any injury or incident
- ensure at induction, and on subsequent occasions identified in their schemes of work, learners know who their safeguarding contact is and how to contact them
- use every opportunity, starting with induction to protect learners, and try to prevent abuse by raising their awareness of increasing harms, for example, local incidents of drugs and knife crime
- pay attention to learners' welfare, well-being and mental health
- promote British Values, for example, by treating everyone fairly with dignity and respect, challenging prejudiced behaviours, and by encouraging learners to do the same
- be alert to signs of abuse and grooming or to signs of fragile mental health
- be vigilant in advising learners about ways to protect themselves against cyberbullying, abuse and extremism, and implement ASES on-line policy
- make sure not to share personal information and personal e-mail addresses with others

ASES staff on apprenticeship programmes must:

- ensure that employers know that they are responsible for health and safety while apprentices are on the employers' premise
- take reasonable steps to check that the employer manages risks effectively
- provide employers with a safeguarding briefing when new learners arrive
- inform employers that they must alert ASES if any safeguarding and/or health & safety concerns
- provide guidance, either through the assessor or through the safeguarding officer
- provide the employer with a safeguarding report form, ask the person responsible to complete it or support him/or her with the process
- advise on any steps to be taken to safeguard the young person

If tutors or assessors notice safeguarding or health and safety issues, they must pass concerns to the employer and contact the safeguarding officer.

Given the increase in remote learning since the COVID-19 pandemic and the requirements of the Prevent duty, tutors and assessors should take steps to reduce **online risks** to learners by:

- warning them of the danger of being exposed to illegal, inappropriate or harmful material, such as fake news, pornography, racist, misogynistic or extremist radical views;
- warning them of the danger of being subjected to harmful online interaction with other users, such as adults posing as young people;
- explaining to them how personal online behaviour may cause harm: for example, making, sending or receiving explicit images, or online bullying (known as cyberbullying).

15) Response to safeguarding disclosures

ASES staff should follow these guidelines where a young person or adult at risk discloses issues of concern:

1. Listen carefully and take notes.
2. Avoid any leading questions: focus on the facts if you can.
3. Question without pressure to be sure that what is being said is properly understood.

4. Reassure the individual concerned that s/he has done the right thing
5. Do not promise that the matter will remain confidential.
6. Explain to the individual who has disclosed information that the disclosure must be passed on but only to those who need to know about it.
7. Do not attempt to investigate the concerns yourself.
8. Alert your safeguarding officer immediately
9. If you cannot contact your allocated or lead safeguarding officer, you contact as swiftly as possible one of the other ASES safeguarding officers or, a City Corporation safeguarding contact, or the Head of Service, or:
10. if a crime has been committed and/or someone is in immediate danger, you should contact the Police.
11. Record your concern on the ASES on-line safeguarding form (Annex 1) as soon as you are able to.
12. Co-operate if the safeguarding officer involves you in recording action taken and outcomes.

Anyone with a concern about another staff member, should notify the Head of Service, Barbara Hamilton, Barbara.Hamilton@cityoflondon.gov.uk . If you have a concern about the Head of Service, contact the City Corporation Local Authority Delegated Officer (LADO) (see page 2 of this document for contact details).

16) Policy monitoring

Senior staff will provide reports to each ASES Steering Group meeting to outline the actions they have taken to implement their policy and provide evidence of their impact. Where they have identified shortfalls in expectations, they will prepare an action plan for review at the next meeting.

They will monitor provision to ensure that:

- staff at all levels, and steering group members, receive safeguarding and Prevent training at an appropriate level, and that this is updated annually.
- policy guidance is up to date and the ASES Safeguarding Young People and Adults and Prevent policy is reviewed and updated annually.
- the ASES steering group receives an update on the monitoring of safeguarding at every meeting.
- all staff have copies of the most up to date policy and supporting guidance documentation and know what their specific responsibilities are.
- safer recruitment policies are fully implemented, including pre-employment checks and maintenance of the single central record. Please see the City of London Corporation *Recruitment and Selection Policy* for further information on the safer recruitment process and procedure.
- all staff follow the requirements in the event of disclosure or the detection of possible abuse or radicalisation, and extra guidance is given in the event of any errors or misunderstandings.
- appropriate guidelines are followed in the event of a disclosure about a staff member.
- records of any Safeguarding and Prevent incidents are maintained in an annual log and reported to the ASES Steering Group in every meeting.
- information about young people and adults at risk is recorded and shared as appropriate with named multi-agency partners.
- tutors and assessors can demonstrate how they have used the curriculum to inform and protect learners
- learners know how to keep themselves safe on-line and how to protect themselves from being drawn into activity such as hate crime or terrorism.
- learners know who to contact in the event of any concerns.
- learners have an understanding how to behave with respect towards others and demonstrate this in lessons and

in on-line contact with other learners

- Designated safeguarding officers, tutors and assessors follow the policy responsibilities in respect of apprenticeship provision
- appropriate action is taken to ensure that safeguarding arrangements for apprentices are in place, to avoid possible duplication in external settings.

Annex 1: ASES Safeguarding/Prevent Report Form

Please complete as much of this form as you can but don't worry if you do not have all details to hand. These can be added at a later date. The most important is to record the learner's name, the reason why you are raising a safeguarding issue, and your details.

1 Learner details

Learner name		Date of birth age	
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Learner address	
Learner contact number mobile/home	
If you know, please give details of name(s) of household members and relationship(s) to the learner*	

** This is particularly important if the learner has any dependents who may be at risk due to the nature of the safeguarding concern*

2 Information relating to the safeguarding/prevent incident or allegation

Date, time and context of disclosure	
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What did the learner tell you and/or what did you observe? (Continue on reverse or use separate sheet as necessary)	
Is the learner aware that this referral is being made?	Yes / No

In your opinion, is the learner at risk of	
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harm or abuse? [to tick boxes double click on box and select checked]

Low Medium High

3 Staff member details

Staff name	
Email	
Contact number	
ACL/Apprenticeship area	

4 To be completed by a member of the safeguarding team

Name	
Date & time of referral to you	
Initial outcome of the referral and any action taken	
Details of any onward internal ASES referral	
Name of person taking internal referral	
Date & time of internal ASES referral	
Details of any onward external referral	
Name of person taking referral	
Date & time of external referral	
Any communication requirements, eg interpreting needs	
Has consent been sought from parents/ carers before making this referral?	

7. HAS THERE BEEN PREVIOUS STATUTORY OR SPECIALIST INVOLVEMENT?					
[to tick boxes double click on box and select checked]					
Children's Social Care	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Child and Adolescent Mental Health Service CAMHS	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Special Educational Needs or Disability	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Borough School Attendance Service / Education Welfare Service	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Specialist Health	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Prevent	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Adult Services – (Mental Health /Drug or Alcohol Abuse /Disability /DV /Housing)	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Youth Justice Service	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Police/Probation/	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
New to Borough	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
Other	No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	Not Known <input type="checkbox"/>
If Other, please provide details of the statutory or specialist involved					

Annex 2: Safeguarding Reporting Procedure Flowchart



Contacts

Status	Name	Contact
ASES Safeguarding Lead (female)	Candice Fanning	Candice.fanning@cityoflondon.gov.uk 020 3838 1399
ASES Safeguarding Lead (male)	Rahil Patel	rahil.patel@cityoflondon.gov.uk 07598 069213
ASES Safeguarding Lead	Catherine Hughes	Catherine.hughes@cityoflondon.gov.uk 020 7332 3209
ASES Safeguarding Lead	Robin Sengupta	robin.sengupta@cityoflondon.gov.uk 0207 332 3918 or 07920 703087
Corporation Safeguarding Lead for Adults	Laura Demetriades	Laura.Demetriades@cityoflondon.gov.uk 0207 332 1215
Community Safety Manager	Valeria Cadena	valeria.cadena@cityoflondon.gov.uk 0207 332 1272