



Worth it.

Safeguarding Policy and Procedure (including Prevent and Esafety)

2018-2020

Table of Contents

Safeguarding Policy Statement	4
Policy Statement:	4
Wandsworth Lifelong Learning Safeguarding Procedure	6
The Role of the Designated Lead	7
Deputy designated safeguarding leads	7
Protection of Students and Children	8
a. Procedures:	8
b. Advice to Staff When to Take Action and How	9
c. What Happens Next	10
d. Confidentiality.....	11
e. Allegations Against Staff	11
f. The member of staff against whom the allegation has been made will be advised to:	11
g. Class Cancellations.....	12
h. Working with 1 students	12
PREVENTING EXTREMISM AND RADICALISATION	13
Introduction	13
Ethos and Practice.....	13
Visiting External Speakers and Events.....	14
Teaching Approaches	14
Reporting Concerns	15
Wandsworth Lifelong Learning Channel Referral Process	16
E-safety	17
Staff Code of Behaviour on Safeguarding	17
a. Staff must:	17
b. Staff must never:	17
c. Implications for staff	18
Safer Recruitment	18
Disclosure and Barring Service Checks	19
Staff Training	19
Staff and Students Safeguarding Training	21
References	23
Appendix A	24
Wandsworth Lifelong Learning Protection of Adults and Safeguarding Children Policy and Procedure, 2018-19.....	24
Appendix B	26
Visiting Speakers/Event – Risk Assessment.....	26
Appendix C	28

Visiting Speakers Referral Form28

Appendix D.....32

Wandsworth Lifelong Learning Service - Visiting Speakers Code of Conduct.....32

Appendix E.....33

DESIGNATED SAFEGUARDING PERSON CONTACTS.....33

Appendix F34

Statutory Framework34

Safeguarding Policy Statement

Policy Statement:

- Wandsworth Lifelong Learning Service is committed to raising staff awareness of all aspects of safeguarding, preventing abuse where possible and ensuring that robust procedures are in place for dealing with incidents of abuse.
- Wandsworth Lifelong Learning Service, our staff, our providers, partners and their staff have collective responsibility to: prevent abuse or neglect of children or at risk adults, respect any confidentiality and report any abuse discovered or suspected. The organisation will not tolerate abuse in any form, and it is committed to promoting wellbeing, preventing harm and responding effectively if concerns are raised.
- It is the Council's policy that all staff who have unsupervised access to children and vulnerable adults undertake a criminal records check with the Disclosure and Barring Service (DBS), checked prior to the commencement of their employment with the Council, and act according to its policies and procedures. Wandsworth Lifelong Learning Service sets a contractual condition that providers carry out DBS checks on all staff who have unsupervised access to children and vulnerable/at risk students. It is expected that these checks will be renewed every 3 years.
- **The Protection of Freedoms Act 2012 amends the definition of a 'vulnerable adult' in the Safeguarding Vulnerable Groups Act, 2006.** Due to the amendments to the definition of 'vulnerable adult', adults accessing learning through WLL are not necessarily 'vulnerable'. However the Service recognises that we have a moral duty to safeguard the wellbeing of all our students and in particular those who are or may be 'in need of community care services by reason of disability, age or illness; and who is or may be unable to take care of him or herself against significant harm or exploitation'. (Department of Health 2000).

In the event of an individual who is considered to be 'vulnerable' for other reasons and of any concerns of abuse, we will follow our safeguarding procedures.

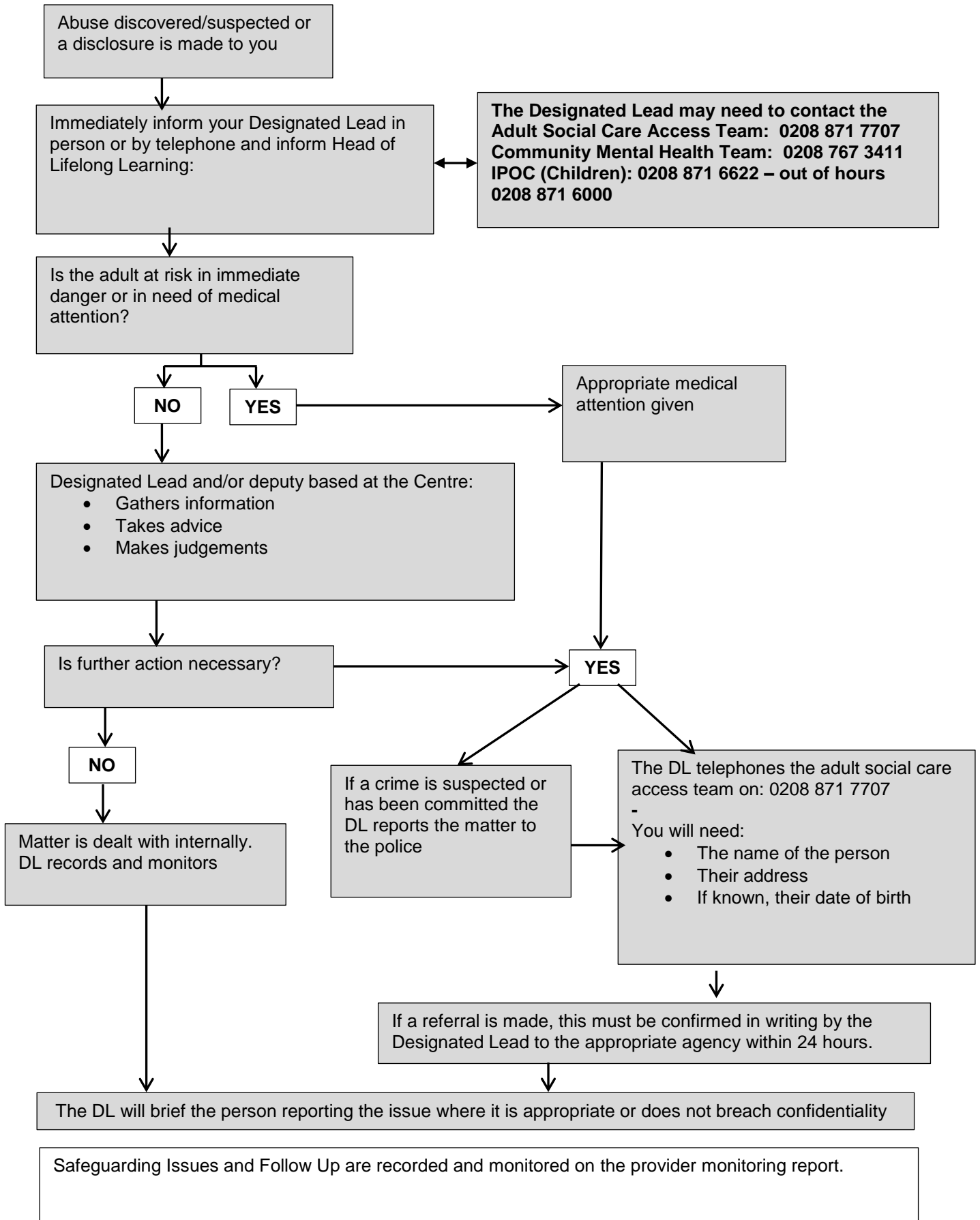
- The Children Act 1989 defines a child as being up to the age of 18 years. Wandsworth Lifelong Learning Services works with children and young people in family learning programmes and the majority of tutors will be working at Children's Centres, nurseries or schools across the borough therefore a DBS enhanced check is essential.
- Wandsworth Lifelong Learning Service (WLL) expects all our providers to use or be informed by this policy and ensure that their staff are aware of the procedures for safeguarding children and vulnerable/at risk adults.
- Wandsworth Lifelong Learning Service expects all staff and our providers to act upon any allegation or concern regardless of how small or trivial it may seem.
- Where children or adults have been viewed as at risk Wandsworth Lifelong Learning Service expects staff and providers to pay special attention to the students' learning needs and try to take into account any reasonable adjustments or special requirements that they may need.
- Ensure all staff receive initial and annual update training in relation to safeguarding and Prevent at a level that is relevant to their role.
- Ensure there is a named Designated Lead (DL) to promote safeguarding awareness and practice within the organisation. This includes using various methods such as meetings,

training and electronic platforms to ensure that this policy is promoted to all learners, employers, staff members and other stakeholders.

- Safeguarding is not just about protecting students, children and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:
 - students' health and safety and well-being, including their mental health
 - meeting the needs of students who have special educational needs and/or disabilities
 - the use of reasonable force
 - meeting the needs of students with medical conditions
 - providing first aid
 - educational visits
 - intimate care and emotional well-being
 - online safety and associated issues
 - appropriate arrangements to ensure students' security, taking into account the local context.

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our students and to promote equality and diversity.

Wandsworth Lifelong Learning Safeguarding Procedure



The Role of the Designated Lead¹

The Designated Safeguarding Lead (DL) is an appropriate senior member of staff who takes lead responsibility for safeguarding, including online safety and this should be explicit in the person's job description. The DL must be a person who has the authority and status to carry out this role as well as be allocated the appropriate time to ensure staff are well trained, understand their responsibilities and are vigilant in keeping students feeling and being safe. The DL must be able to carry out their role independently, particularly in relation to potential allegations involving members of staff.

Deputy designated safeguarding leads

The deputy safeguarding lead (DDL) supports the DL and are trained to the same standard as the designated lead. This role should also be explicit in the person's job description. Although some activities of the designated lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding remains with the designated safeguarding lead and cannot be delegated.

Designated Lead Duties

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority or Channel programme as required
- refer cases where a person is dismissed or left due to risk/harm to a students to the Disclosure and Barring Service as required
- refer cases where a crime may have been committed to the Police as required.
- act as a point of contact with the three safeguarding partners
- act as a source of support, advice and expertise for all staff.
- ensure each member of staff (especially new and part time staff) has access to, and understands, the Safeguarding Policy, process and procedure including having access to an appropriate induction that includes all relevant reading materials
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- are able to keep detailed, accurate, secure written records of concerns and referral
- maintaining a central register of staff, including: an individual's identity and right to work in the UK, DBS check/certificate including prohibition from teaching, check of professional qualifications, further checks on people living or working outside the UK.
- understand the requirements of the Prevent duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are online
- ensure the Safeguarding policies are known, understood and used appropriately
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- ensure that in their absence there is sufficient coverage of the above responsibilities by Deputy Designated Lead(s).

Designated safeguarding leads must be aware of local plans and timelines for the transition from the Local Safeguarding Children Board to new multi-agency arrangements led by the three safeguarding partners (the local authority, clinical commissioning group and the chief officer of police) and act as the main point of contact with the safeguarding partners.

¹ The Role of the Designated Lead is fully explained in: '[Keeping Children Safe in Education](#)', Annex B, pg 89

Protection of Students and Children

a. Procedures:

The purpose of these guidelines is to ensure that the rights of children and at risk individuals are protected through staff vigilance and awareness of the issues and by following both statutory and Council guidelines in the reporting of concerns. If any member of staff or volunteer has reason to believe that abuse is or may be taking place you have a responsibility to act on this information. It does not matter what your role is, doing nothing is not an option.

The first priority should always be to ensure the safety and protection of all children (including any siblings at home that may be at risk), students and adults.

It is the responsibility of senior managers to ensure that staff and volunteers from all services and settings are familiar with the Safeguarding Policy and procedures to enable them to take appropriate action. All staff and volunteers from any service or setting who have contact with students and children have a responsibility to be aware of issues of abuse, neglect or exploitation.

All staff and volunteers have a duty to act in a timely manner regarding any concern or suspicion about a students or child who is at risk of being abused, neglected or exploited and to ensure that the situation is assessed and investigated.

Staff and volunteers should:

- be aware that they should call the police and/or an ambulance where appropriate in situations where the abuse of the adult indicates an urgent need for medical treatment, or where there is immediate risk of harm indicating urgent action is needed to protect the person
- be authorised to make a report to the police, and if a crime has been committed, ensure action is taken to preserve evidence. This could be where there has been a physical or sexual assault, especially if the suspect is still at the scene
- share their concern with colleagues and seek advice and support
- know they must inform their Designated Lead or line manager as quickly as possible. If their Designated Lead or line manager is implicated in the abuse then they should inform a more senior manager
- know what services are available and how to access help and advice for the adult at risk
- know how and where to make a direct referral, where speaking to a manager would cause delay
- know that they must make a clear factual record of their concern and the action taken – for further guidance see the **Record of Disclosure and Discussion at Appendix A.**

The report should be factual and should **not include** opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the at risk individual concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If

you are unsure about what to write, you can get advice from your Designated Lead or Wandsworth Lifelong Learning Service.

Wandsworth Lifelong Learning Service expects our providers to put measures in place to identify any at risk individual at admission on to a course. WLL require that providers inform their tutors, as part of the admission procedures, if at risk individuals have been enrolled on courses, where these are not specifically designed for at risk individuals.

b. Advice to Staff When to Take Action and How

At risk individuals can potentially be abused by anyone. This includes within the family, community and organisations, by employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers, and fellow students².

Keep your Designated Lead's contact details immediately accessible to you, we suggest you add the number to your telephone contacts. Once you suspect or know of any abuse of any individual, you should immediately inform the Designated Lead for your setting in person or by telephone and inform the Head of Lifelong Learning. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact them to discuss your concerns.

You must not try to investigate the matter on your own. Staff are not equipped or qualified to do so.

If a student, child or an adult comes to you with an apparent report of abuse, you should listen carefully to him/her, using the following guidelines. When listening to the individual staff must:

- Remind the individual of your obligation to pass on information and that you will not be able to keep information confidential if it is a safeguarding concern
- Allow the individual to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead the individual in any way
- Reassure the individual, let them know you are glad they have spoken up and that they are right to do so
- Always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the individual – spare them having to repeat themselves over and over
- Remain calm – remember this is not an easy thing for them to do
- Do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the individual know that you are taking the matter very seriously

² 'What to do if you're worried a child is being abused: advice for practitioners', Department for Education, March 2015; www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2.

- Make the individual feel secure and safe without causing them any further anxiety.

Any detailed information about a case will be confined to the Designated Lead and the Head of Lifelong Learning or their deputy, except where referral to an external agency is to be made.

Information will be dealt with in a confidential manner. Staff will be informed of relevant details on a need to know basis when the DL feels their having knowledge of a situation is relevant and appropriate. A written record will be made of what information has been shared with whom, when and why.

Safeguarding records will be stored securely in a central place. Access to these records by staff other than the DL and their deputies will be restricted.

WLL will not disclose to a parent, other relative or carer any information help on a child or at risk person if this would put them at risk of significant harm.

Although Wandsworth Lifelong Learning Service and our providers are funded to work with students over the age of 19, all staff should be aware of the mandatory duty to report to police any case where an act of female genital mutilation appears to have been carried out or about to be carried out on a girl under the age of 18. Apprentices under the age of 18 may be enrolled on to a WLL course.

c. What Happens Next

Taking into account all the information available, the **Designated Lead** will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Wandsworth Adult Social Care or Family Support and Child Protection Team as appropriate
- Make a referral to Social Services
- Report the incident to a designated Social Worker (if the adult has one)
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing by the Designated Lead to the appropriate agency within 24 hours.

If the member of staff does not agree with the decision of the Designated Lead that no further action is necessary, the member of staff should refer these concerns in the first instance to the Head of Lifelong Learning. If the Head of Lifelong Learning does not recommend further action and the member of staff still has concerns, then the member of staff has the right and duty to refer the case directly to Wandsworth Adult Social Services or the Local Child Safeguarding Board as appropriate and should at the same time alert the Council's Director or Assistant Director of Adult Social Care under the council's 'Whistleblowing' procedure.

It may be considered that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the individuals, other students, staff, parents or carers involved) the provider's Designated Lead will make the necessary arrangements.

The provider's Designated Lead will inform the member(s) of staff, who raised the concern, about the processes and procedure that has been followed, but will not feedback on any information that may be considered a breach of confidentiality. The DL should do this within 5 working days.

d. Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the individual is the overriding concern. The degree of confidentiality will be governed by the need to protect the individual. The individual should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversations regarding an individual should always be held in private.

Wandsworth Lifelong Learning Service complies with the requirements of the General Data Protection Act 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of an at risk individual or siblings aged under 18.

Whatever happens, you should always be open and honest with the individual if you intend to take the case further. Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the provider Designated Lead or the Head of Lifelong Learning.

e. Allegations Against Staff

The primary concern of Wandsworth Lifelong Learning Service is to ensure the safety of the individual. It is essential in all cases of suspected abuse by a member of staff that action is taken quickly and professionally.

There are occasions where an individual will accuse a member of staff of physically or sexually abusing them. In some cases this may be false or unfounded. However in some cases the allegations may be true.

Any instance of an at risk individual being abused by a member of staff is particularly serious. On the other hand for an innocent person to be accused of such an act is a serious ordeal, which can result in long-term damage to their health and career.

In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Designated Lead in the organisation/s.

If the allegation concerns any member of the Wandsworth Lifelong Learning Service team the matter should be discussed with the Head of Lifelong Learning. If the allegation concerns the Head of Lifelong Learning, the matter should be discussed with the Assistant Director of Education, Standards and Inclusion who will follow the Council's normal procedures for safeguarding children or adults.

f. The member of staff against whom the allegation has been made will be advised to:

- Contact their union or legal representative
- Keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.

If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under the Council's disciplinary procedures related to at risk individual abuse allegations, copies of which can be obtained from Human Resources or The Loop.

g. Class Cancellations

If a class has to be cancelled at short notice, for example because of sickness, the Provider Manager should use the established procedure for notifying vulnerable adults and/or their carers/support workers in order to prevent them from getting into a situation where their needs cannot be met. Tutors who have vulnerable adults in their classes have a responsibility to inform the Provider Manager of this when they call in to report an absence.

h. Working one to one with a student

In the unlikely event that there is only 1 student present for a class, additional safeguards should be in place:

1. Inform any centre staff that you are there with only 1 student, and inform them when the student leaves
2. Work in a situation where you are visible, for example a central location in the building, keep the door open and ask other staff to walk past regularly
3. It may be appropriate to ask the student to remain in reception until another member of staff arrives.

PREVENTING EXTREMISM AND RADICALISATION

Introduction

Wandsworth Lifelong Learning is committed to providing a secure environment for students, where they feel safe and are kept safe and where equality and inclusion are actively promoted.

Ethos and Practice

When operating this policy Wandsworth Lifelong Learning uses the following definition of extremism:

'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 any person, whether in this country or overseas'.

There is no place for extremist views of any kind in Wandsworth Lifelong Learning, whether from internal sources – students, staff or governors/trustees; or external sources - community, external agencies or individuals. Our students see our classes as a safe place where they can, at appropriate times, explore controversial issues safely and where our tutors encourage and facilitate this – we have a duty to protect this freedom.

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our students.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the development of students. Education is a powerful weapon against this; equipping people with the knowledge, skills and critical thinking, to challenge and debate in an informed way and to ensure that they thrive, feel valued and not marginalised.

As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of the provider, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Provider, local authority and police reports of issues affecting students in other providers or settings.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Extreme Anti-Western or Anti-British views.

Visiting External Speakers and Events

In order to comply with the duty, our providers should take the appropriate measures to ensure that visiting speakers are suitably vetted, safety of our students is not compromised and security and welfare of students and staff are prioritised. We encourage the use of external/visiting agencies or speakers to enrich the experiences of our students; however we will positively vet those external agencies, individuals or visiting speakers, to ensure that we do not unwittingly use agencies that contradict or are in opposition with the service's values and ethos, in particular the values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs".

To ensure the safety of all our students and staff we will:

1. Complete the Risk Assessment for any visitors (**Appendix B**) prior to any external speaker being invited into any class and that the Provider Manager has agreed the visit. If there is a YES response to any of the 3 key questions, a Visiting Speaker Referral Form (**Appendix C**) must be completed and forwarded to the Provider Manager and agreed before the event can go ahead.
2. Ensure the visiting speaker reads and agrees the External Speaker Code of Conduct and that they understand they must abide by WLL equality commitments; that there must be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there must be no extremist material. (**Appendix D**)
3. Talk to the speaker about the content of their presentation before the event
4. The visiting speaker must arrive in good time to sign in and bring suitable identification.
5. Visitors must be supervised at all times and not be left alone with students, unless a DBS certificate has been presented.
6. Bring to an end any presentation where the content proves unsuitable or offensive.
7. Complete an evaluation, note any contentious subject area or comments and state whether the speaker could be booked again in the future. Once a person has already visited, future checks should be proportionate.

These apply to all staff, students and visitors and clearly set out what is required for any event or visit to proceed.

NB:-If any member of staff has any concern regarding a venue or event they should contact the Wandsworth Prevent Co-ordinator or they should contact the police.

We understand that each provider needs to balance their legal duties in terms of both ensuring freedom of speech and also protecting student and staff welfare.

Teaching Approaches

At Wandsworth Lifelong Learning we promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We teach and encourage students to respect one another and to respect and tolerate difference.

We will all strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches they may

experience elsewhere may make it harder for them to challenge or question these radical influences.

In our provision this will be achieved by good and excellent teaching. We will ensure that all of our teaching approaches help our students build resilience to extremism and give students a positive sense of identity through the development of critical thinking skills.

We will:

- make a connection with students through good teaching design and a students centred approach;
- facilitate a 'safe space' for dialogue; and
- equip our students with the appropriate skills, knowledge, understanding and awareness for resilience.

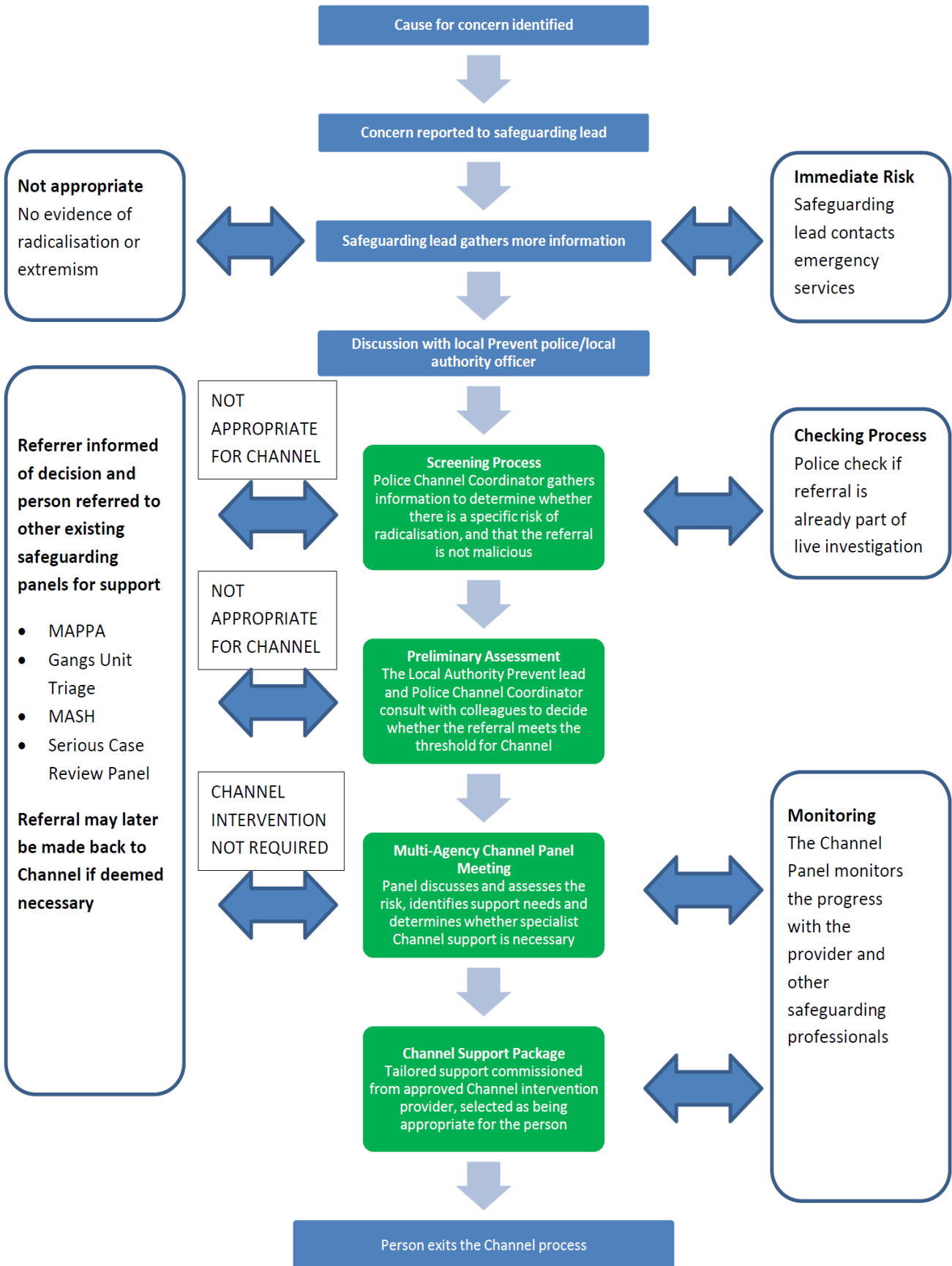
This approach will be embedded within the ethos of our providers so that students know and understand what safe and acceptable behaviour with regard to extremism and radicalisation.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution.

Reporting Concerns

Where there are concerns of extremism or radicalisation they should be reported to the provider's designated safeguarding lead under existing safeguarding and Channel referral procedures (please see Channel Referral Process Flowchart below).

Wandsworth Lifelong Learning Channel Referral Process



E-safety

Online safety and security is a prime consideration for all Wandsworth Lifelong Learning provision. Wandsworth Lifelong Learning recognises the benefits and opportunities which new technologies offer to teaching and learning. However, the accessible and global nature of the internet and variety of technologies available mean that we are also aware of potential risks and challenges associated with such use. We do all that we can to make our students and staff stay e-safe and to satisfy our wider duty of care. This Safeguarding Policy should be read in conjunction with the Wandsworth Lifelong Learning E-safety and E-responsibility policy and all other relevant Wandsworth Lifelong Learning policies.

Staff Code of Behaviour on Safeguarding

Wandsworth Lifelong Learning Service recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with at risk individuals and to guarantee the protection of at risk individuals and staff.

However, below are the standards of behaviour required of staff in order to fulfil their roles and duty of care within Wandsworth Lifelong Learning. This code should assist in the protection of both individuals and members of staff.

a. Staff must:

- Implement the Safeguarding Policy and Procedure at all times
- Have due regard to the need to prevent people from being drawn into terrorism which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit³
- Understand their legal responsibility to exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" in their practice.⁴
- Have due regard to the safe and responsible use of online and digital technologies.

b. Staff must never:

- Engage in rough, physical games including horseplay with any students
- Allow or engage in inappropriate touching of any kind
- Do things of a personal nature for adults or children that they can do for themselves
- Physically restrain an adult or child unless the restraint is to prevent physical injury of the adult/other adults/visitors or staff/themselves. In all circumstances physical restraint must be appropriate and reasonable; otherwise the action can be defined as assault
- Make sexually suggestive comments to any students

³ Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 - Section 1

⁴ Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 – Section 20,21

- Have adults or children on their own in a vehicle. Where circumstances require the transportation of individuals in their vehicle, another member of staff/volunteer must travel in the vehicle. Also it is essential that there is adequate insurance for the vehicle to cover transporting these individuals. In extreme emergencies (for medical purposes) where it is required to transport an individual on their own, it is essential that another member of staff or your line manager and the key worker, or parent/carer are notified immediately
- Spend time alone with an individual on his/her own, outside of the normal tutorial/classroom situation or learning environment. If a member of staff finds themselves in a situation where they are alone with an at risk individual, the member of staff must make sure that they can be clearly observed by others
- Engage in a personal relationship with an adult student, or an adult who becomes a student, beyond that appropriate for a staff/student relationship
- Share **personal** mobile, email or social media sites with students.

c. Implications for staff

Staff who breach any of the above may be subject to the disciplinary procedure. If an allegation against a member of staff has occurred, then an investigation will be carried out in accordance with the WLL procedure for dealing with such allegations against staff.

Safer Recruitment

WLL and our partners ensure that we check applicants have a right to work in the UK and follow best practice in Safer Recruitment. The WAL partnership adheres to the Borough of Wandsworth Recruitment and Selection Policy and Procedure when engaging staff to work in the Council. WLL partners must have a Safer Recruitment Policy and Procedure that minimises the risk of engaging unsuitable candidates.

Tutors and managers require a DBS check according to their role.

1	Family Learning Tutors	Enhanced DBS and check against barred list
2	All WLL Tutors, excluding Family Learning	Enhanced DBS
3	Tutors, support workers and volunteers who work in schools during school hours	Enhanced DBS and check against barred list
4	Tutors of classes with Students with Learning Disabilities/Difficulties (LDD)	Enhanced DBS and check against barred list
5	Managers of any of the staff listed above	Enhanced DBS and check against barred list
6	Designated Safeguarding Leads, Deputy Safeguarding Leads, Safeguarding Teams	Enhanced DBS and check against barred list
7	Students under 18 in class	Enhanced DBS and check against barred list
8	Other staff (including but not limited to: reception and administrative staff, advisers and facilities staff)	No automatic DBS. Risk assessment should be carried out for each role

WLL advises tutors to sign up to the DBS Update Service to enable them to keep DBS certificate up to date and for employers to check DBS certificates online. DBS checks are renewed when there is a gap in service of more than 3 months; when someone's role changes from volunteer or support worker to tutor or when a line manager deems it is advisable for any other role change. Wandsworth Borough Council requires all DBS checks to be renewed after 3 years.

Disclosure and Barring Service Checks

Following the DBS check, the certificate will be sent to the applicant who must in turn show it to their potential or current employer prior to taking up their post or as soon as practicable afterwards. If the applicant has subscribed to it and gives permission, the provider may undertake an online update check through the DBS Update Service to ensure the information contained within a previously issued certificate remains current. The provider should consider any and all information contained in the certificate and provided by the update service as part of their wider decision on an individual's suitability.

If a provider allows an individual to start work in regulated activity before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that all other checks are completed to ensure that the individual is not barred by the DBS. This includes carrying out an appropriate risk assessment, recording this on the Monthly Quality Report and sending the risk assessment to WLL. The provider must evidence that they are in the process of obtaining a DBS certificate for that individual.

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff. In addition, providers must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These further checks should include a check for information about any teacher sanction or restriction that a European Economic Area professional regulating authority has imposed. The provider should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.

A provider may request an enhanced DBS check with barred list information if there are concerns about an individual who has worked abroad. Providers must bear in mind that they are under a duty not to allow a barred person to work in regulated activity.

An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of pre-employment checks including seeking references⁵.

Staff Training

In line with *Keeping Children Safe in Education: Information for all school and college staff*, September 2016, revised for use from 3rd September 2018, Wandsworth Lifelong Learning is committed to preparing our providers and their staff to act in accordance with the expected Safeguarding Policy and procedures.

The Designated Safeguarding Lead is trained at National Level which should meet level 3 /4 standards. This must be refreshed every 2 years. In addition the Designated Safeguarding Lead will undertake annual CPD which is documented on the central staff training record.

Where a Deputy Designated Safeguarding Lead is in place, they receive training at the equivalent to level 3. This is refreshed every 2 years. Annual CPD for all staff is to be delivered

⁵ More information about how to conduct these checks is in the DfE guidance 'Keeping children safe in education', paragraphs 127 to 132.

by the Designated Safeguarding Lead or their deputy. This is certificated and recorded on the central staff training record.

All new staff are required to have a safeguarding induction prior to starting or as soon as they start in their role followed by mandatory safeguarding training within the first 3 months of employment. For student-facing staff this should meet the Level 2 safeguarding training standards and can be written and delivered by a recognised Safeguarding expert or a Designated Safeguarding Lead or their deputy.

WLL has provided online safeguarding adults and children use as part of the safeguarding induction. The person carrying out the induction must ensure all staff have read: 'Keeping Children Safe in Education, part 1', Sept 2018 and 'What to do if you're worried a child is being abused: advice for practitioners' Mar 2015. All new staff will need to attend a 'Workshop to Raise Awareness of Prevent' (WRAP) training which will be organised by WAL.

It is expected that key staff undertake formal refresher training annually and all other staff every 3 years. This is in addition to annual CPD activity. In year updates to policies/procedures will be communicated to relevant staff via email, updates or through team meetings. It is the provider manager's responsibility to ensure that all staff have access to up to date information.

Further to mandatory safeguarding training the Designated Safeguarding Lead and the Deputy Designated Lead are available to offer generic and specific information, advice and guidance to staff around day to day safeguarding matters either by phone or by email.

This policy will be a source of reference, promoted and discussed during team meetings to ensure that all staff members have a good understanding and commitment to the policy and can deliver this information effectively to learners, employers and other stakeholders.

Staff and Students Safeguarding Training

Training	Delivered and organised by	By When	Resources	Update
Staff – Safeguarding induction	Training provider Designated Safeguarding Lead or deputy	Prior to starting work or 1 st day or within 1 st week of starting work	Safeguarding adults and children <u>'What to do if you're worried a child is being abused: advice for practitioners'</u> , www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 .	
Learner/Apprentices – Safeguarding Induction	Tutors	1 st session during induction	Learner Handbook	At the start of every course
Staff – Mandatory Safeguarding Training	Organised by individual training providers	1 st 3 months in post	Safeguarding in FE https://www.foundationonline.org.uk/course/view.php?id=53	Every 3 years
Staff – Mandatory WRAP Training	Organised by WLL (can be organised by individual training providers)	1 st 3 months in post		
Staff – Annual update	Organised and delivered by training providers' Designated Safeguarding Lead	Annually		
Staff – Designated Lead Training	Organised by WLL for Leads and Deputies	When needed		Every 2 years
Staff – Safer Recruitment Training	Organised by individual providers' Designated Safeguarding Leads for recruiting managers	When needed	Safeguarding and Safer Recruitment in FE	

			https://www.foundationonline.org.uk/course/view?id=54	
--	--	--	---	--

References

The Care Act 2014

The Care and Support Statutory Guidance – updated Dec 2016

Wandsworth Safeguarding Adults Board Adult Safeguarding Policy

[Keeping Children Safe in Education – updated Sept 2018](#)

Prevent Duty guidance: for further education institutions in England and Wales – updated March 2016

The Protection of Freedoms Act 2012

Safeguarding Vulnerable Groups Act 2006

The Children’s Act 2004

No Secrets: guidance on protecting vulnerable adults in care - Department of Health - updated January 2015

What to do if you’re worried a child is being abused: advice for practitioners, Department for Education, March 2015; www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2.

Review: This policy is reviewed 3 yearly or immediately to reflect any changes to internal policies and procedures and external legislation.

***If you feel distressed as a result of your discussion please contact your line manager to discuss a confidential debriefing or to arrange counselling support.**

Emergency contacts:

Wandsworth Lifelong Learning Service

For Adults – contact the Adult Social Care Access Team on:

0208 871 7707

You will need:

- The name of the person
- Their address
- If known, their date of birth

Communication Mental Health Team on: 0208 767 3411

IPOC (Children) contact: 0208 871 6622 – out of hours 0208 871 6000

Urgent Referrals - 999 where there is immediate risk of injury, security or medical assistance is required

Appendix B

Visiting Speakers/Event – Risk Assessment

Provider

Part 1: Event Organiser details:
Name:
Contact details (tel no. and email):
Part 2: Proposed event details:
Speaker's name:
Speaker's role:
Speaker's organisation:
Proposed event title:
Proposed event date:
Event description (max 50 words, include topics to be discussed):
Target audience (profile and size). <i>Please indicate and give details if you believe the event will attract any groups or individuals that have previously been known to express views that may be in breach of the Visiting Speaker Code of Conduct or in conflict with Wandsworth Lifelong Learning Service's values and ethos?</i>
Proposed External Speaker(s): <i>Please include links to biographical information and indicate and give details if you believe that any of your proposed speakers have previously been prevented from taking part in an event at any Adult Education establishment or similar educational establishment</i>

Assessment of proposed external speaker(s)

Prior to the confirmation of any external speaker, the event organiser will be responsible for assessing the speaker against the following set of questions:

Question 1: Has the speaker previously been prevented from speaking at **(insert provider name)**, another ACL provider/HE/FE provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct? **YES / NO**

Question 2: Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the Visiting Speaker Code of Conduct? **YES / NO**

Question 3: Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the Visiting Speaker Code of Conduct? **YES / NO**

If the answer to all three questions is NO:

The event organiser can submit this form to their Provider Manager to confirm the external speaker and proceed with organising the event.

If the answer to any of the questions is unclear:

The event organiser must seek guidance from their Provider Manager, whose responsibility it will be to further review the speaker(s) against the questions above.

Ultimately, if the answer to any of the questions is YES:

It is the responsibility of the event organiser to submit a referral to the Provider Manager for consideration. To make a visiting speaker referral submission:

1. Complete the **Visiting Speaker Referral Form**.
2. Complete all sections of the form with as much detail as possible.
3. Send the form as an attachment to the Provider Manager

In all cases where the event will proceed please:

- Send the speaker a copy of the Visiting Speaker Code of Conduct.

Approval notification

I undertake that, to the best of my knowledge, the information provided on this form is correct.

Signed **Event organiser**

Appendix C

Visiting Speakers Referral Form

Provider

If the proposed visiting speaker has an answer of **YES** to **ANY** of **3** key questions on the **Visiting Speaker Risk Assessment**, this form must be completed in full and passed to your **Provider Manager** for approval (alongside the original Risk Assessment).

Part 1: Event Organiser details:

Name:

Contact details (tel no. and email):

Part 2: Proposed event details

SPEAKER DETAILS

Speaker(s) name:

Speaker(s) address:

Speaker(s) phone number:

Speaker(s) email:

Speakers website/YouTube/Social Media URLs:

Speaker(s) organisation (if applicable):

Organisation's details (e.g. address, website, company number):

Does the speaker or members from the organisation they represent have a reputation for causing disruption at venues?

Are there likely to be any health and safety or public order issues that may occur as a result of this event?

EXPANDED RISK ASSESSMENT OF PROPOSED EXTERNAL SPEAKER(S)

Provide an explanation of the following questions from the **Risk Assessment** you answered **Yes** to:

1. Has the speaker previously been prevented from speaking at any Lifelong Learning establishment, another Lifelong Learning provider or HE/FE provider or similar educational establishment, or previously been known to express views that may be in breach of the Visiting Speaker Code of Conduct?
2. Does the proposed topic or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the Visiting Speaker Code of Conduct?
3. Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?

EVENT DETAILS

Event title:

Has speaker presented the same or similar topic before?

If Yes, has the topic met regionally or nationally with any criticism or hostility when it has been hosted before?

Is the speaker requesting special conditions such as a closed meeting, tickets or segregation?

Has any pressure (either directly or indirectly) been undertaken by any person to run or not to run this event? Is there community pressure to run the event? (or has there been objections by some people to run it?)

Part 3: Protocol checklist:**1. Scanning**

Has the speaker request been received by the Provider Manager at least 20 working days in advance of the planned event? **Yes/No**

Has the speaker request been forwarded to London Boroughs of Wandsworth, and the Metropolitan Police Service (if appropriate) at least 5 working days in advance of the planned event? **Yes/No**

Has the transcript of the speech been submitted to the authorising staff member? **Yes/No**

Has the speaker provided a proof of identity? **Yes/No**

Has a reference file been collated? **Yes/No**

Is there a staff member with clear responsibility for collating information and liaising with partner agencies? **Yes/No**

2. Analysis:**Have open source checks been carried out on the following:**

- published material
- previous speech content
- known affiliations
- aliases

Have the open source enquiries been documented and referenced?**Yes/No**

If there are concerns or anxieties, have the following partners been informed:

- London Boroughs of Wandsworth
- Metropolitan Police Service

Yes/No**Yes/No**

Has the reference file been updated with new information?

3. Response

Does the visiting speaker or the intended presentation breach any condition of the Visiting Speaker Code of Conduct?

Has the speaker been given permission to present?

If yes, has the speaker received information on the provider's code of conduct and safeguarding principles?

Has a reference file been updated with justification as to why the visiting speaker was authorised / declined?

Which member of staff has authorised the speaker?

4. Assessment (after the event)

Did the speaker comply with the Provider's Visiting Speaker Code of Conduct and Safeguarding Principles?

Did the speaker contribute to the objective of the event?

Would the Provider invite this speaker again? If no, why not?

Has the reference file been updated?

Response to External Speaker Referral Form

Provider Manager response:

Date

Appendix D

Wandsworth Lifelong Learning Service - Visiting Speakers Code of Conduct

Introduction

This code of conduct is in place to ensure that all visiting speakers, external speakers and external organisations taking part in any event or session funded by Wandsworth Lifelong Learning act in accordance with the law and do not breach the lawful rights of others.

It is the responsibility of the event organiser to ensure that any visiting speaker has read and agrees to abide by this Code of Conduct and that the Code of conduct is communicated to all external speakers.

Conduct

Below are the minimum expectations of any visiting speakers and it is expected that no visiting speaker will:

- Act in breach of criminal law
- Incite hatred or violence or any breach of the criminal law
- Encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism
- Spread hatred and intolerance
- Discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age
- Defame any person or organisation
- Use the speaking opportunity to raise or gather funds for any external organisation

The visiting speaker will also abide by and follow all policies relating to and instructing on health, safety, safeguarding, Prevent and the acceptable use of any ICT systems. They will not present ideas and opinions that may be contentious or potentially offensive and they should be prepared to be open to debate, challenge and questions.

Wandsworth Lifelong Learning has a duty under the Equality Act 2010 as an education provider, employer and service provider not to unlawfully discriminate against any students, employees and any other individuals to whom services are provided. As such, segregation by sex is not permitted in any academic meetings, events, learning sessions or meetings provided for students and is not permissible for any event covered by this visiting speakers Code of Conduct. The only exception to this is events that are for the purpose of collective religious worship.

Appendix E

DESIGNATED SAFEGUARDING PERSON CONTACTS

The following are the Designated Leads for Wandsworth Lifelong Learning providers. Designated Leads are listed first. Any changes must be notified to WAL immediately.

Provider	Designated Lead/s	Contact details

Appendix F

Statutory Framework

The key current guidance for education and training providers are:

- 'Keeping Children Safe in Education 3 Sept 2018: for schools and colleges' issued in September 2018
- 'Revised Prevent duty guidance for England and Wales' specific guidance on authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism, HM Government 2015
- 'Prevent duty guidance for further education institutions in England and Wales'
- 'What to do if you are worried a child is being abused 2015'
- 'Inspecting safeguarding in early years, education and skills settings' August 2016.

The safeguarding of children is everyone's business and education providers have a responsibility under Section 175 of the Education Act 2002 to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. This includes:

- Preventing the impairment of children's health or development
- Protecting children from maltreatment
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.

The UN Convention on the Rights of the Child defines a child as everyone under 18 unless, "under the law applicable to the child, majority is attained earlier" ([Office of the High Commissioner for Human Rights, 1989](#)). The UK has ratified this convention. The Children Act 1989, 2004 defines a child as being up to the age of 18 years.

The Protection of Freedoms Act 2012 amends the definition of a 'vulnerable adult' in the Safeguarding Vulnerable Groups Act, 2006. Due to the amendments to the definition of 'vulnerable adult', adults accessing learning through WLL are not necessarily 'vulnerable'. However the Service recognises that we have a moral duty to safeguard the wellbeing of all our students and in particular those who are or may be 'in need of community care services by reason of disability, age or illness; and who is or may be unable to take care of him or herself against significant harm or exploitation'. (Department of Health 2000).

In the event of an individual who is considered to be 'vulnerable' for other reasons and there being concerns of abuse, we will follow our safeguarding procedures.

Wandsworth Lifelong Learning Service will review our policy and procedures annually to take into account any new government legislation, regulations or best practice documents to ensure that staff and partners are kept up to date with their responsibilities and duties with regard to the safety and wellbeing of children and adults.