



SAFEGUARDING POLICY AND PROCEDURE

(INCLUDING PREVENT AND E-SAFETY)

MAY 2021

Aiming to improve the quality of life skills and employability of residents in the Borough, making Wandsworth a vibrant, prosperous learning community

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Original Policy issued:	December 2017
Next review date:	October 2021
Review cycle	Three years
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Target Audience	All

Safeguarding Policy and Procedure (including Prevent and e-safety)

Safeguarding Policy Statement

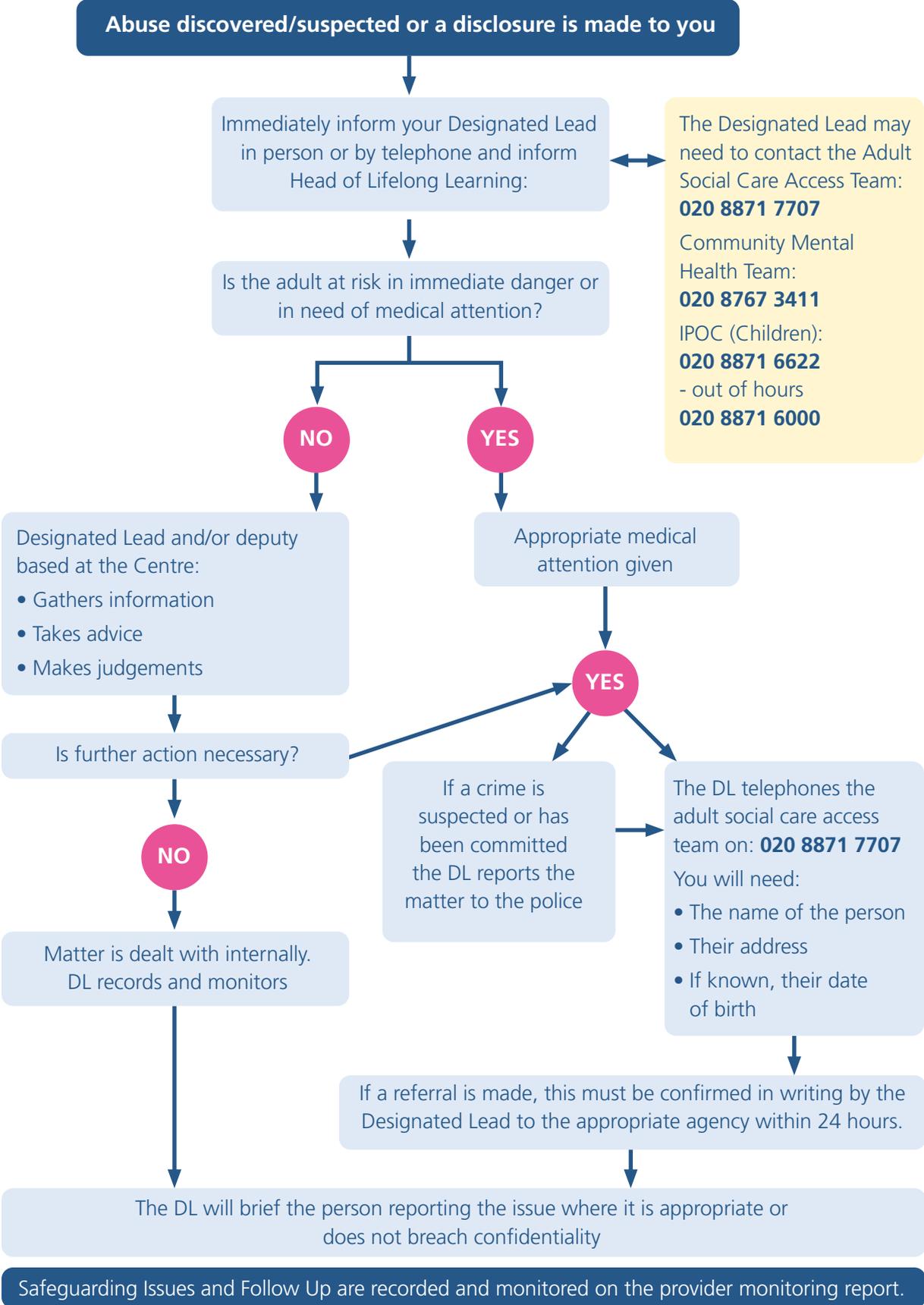
Policy Statement:

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

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners 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 learners and to promote equality and diversity.

Wandsworth Council Lifelong Learning Safeguarding Procedure



The Role of the Designated Lead

The Designated Safeguarding Lead (DL) is an appropriate senior member of staff who takes lead responsibility for safeguarding, including online safety and this is explicitly detailed 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 learners 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 learners 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 learners 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 learners 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.

Wandsworth Council Lifelong Learning Safeguarding Team



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Protection of Learners 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), learners 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 learners 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 learners 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/or child 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 concerns or the disclosure of abuse or harm made to you by the vulnerable adult or child 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 Council Lifelong Learning Service.

Wandsworth Council 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 learners¹.

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 learner, 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
- It is OK to 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. If they do not wish to give additional information do not insist, they do so.
- 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
- 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.

¹ '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.

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. In these instances, there will a discussion with the relevant social care section to agree how the information will be shared.

Wandsworth Council Lifelong Learning Service and our providers are funded to work with learners 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.

County Lines - the UK Government defines county lines as:

'County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.'

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. All staff and providers should immediately report any concerns to WCLL DSL or Deputy.

All staff and providers must be vigilant to the signs of peer-on-peer, child on child abuse and report any concerns or incidents immediately to WCLL DSL or Deputy. Any allegations will be recorded, investigated and addressed, with support available for victims, perpetrators and other parties affected. This includes all aspects of bullying, on-line safety including youth produced imagery (sexting) and gender issues. Staff and providers will be encouraged to cover relevant topics in regard to relationships, health and sex education where appropriate. WCLL will also encourage staff and providers to complete relevant training in relation to RSHE.

Identification of a weapon on site or if a staff member has a concern that a learner is involved with a gang/knife crime must be reported to the DSL/Deputy immediately. WCLL and providers must have clear code of conduct in place and all learners must be aware of this.

All concerns of up skirting will be reported to the police and/or MASH where there are safeguarding concerns for young people/children.

Domestic abuse is unacceptable in any situation, no matter what stresses people are under. There is no excuse for abuse. Domestic abuse is not always physical violence.

It can also include:

- Coercive control and 'gaslighting'
- Economic abuse
- Online abuse
- Verbal abuse
- Emotional abuse
- Sexual abuse

Staff members or providers should report to WCLL DSL or Deputy any concerns. WCLL encourages all staff and provider members that have a safeguarding role to undertake domestic violence training.

WCLL will promote effective liaison with other agencies in order to protect all learners in line with statutory guidance..

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. Records will be kept of any discussions and the rationale for deciding not to take any 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 learners, 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 five 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 Council 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 or Volunteers

The primary concern of Wandsworth Council 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. All allegations will be taken seriously and investigated.

Any instance of a child, young person or vulnerable adult 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 learner, it is their responsibility to bring these concerns to the Designated Lead in the organisation/s, who will refer the matter to the Local Authority Designated Officer (LADO) within 24 hours.

If the allegation concerns any member of the Wandsworth Council 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, which is to refer the matter to the LADO. The LADO will advise whether the allegation meets threshold and will also provide guidance about the next steps to be taken.

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.

Once the LADO process has concluded and an allegation is substantiated a decision is made as to whether further disciplinary measures are required. If so these will be dealt with under the Council's disciplinary procedures etc 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 learner

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

1. Inform any centre staff that you are there with only 1 learner, and inform them when the learner 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 learner to remain in reception until another member of staff arrives.

Preventing Extremism and Radicalisation

Introduction

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

Ethos and Practice

When operating this policy Wandsworth Council 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 Council Lifelong Learning, whether from internal sources – learners, staff or governors/trustees; or external sources – community, external agencies or individuals. Our learners 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 learners 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 learners.

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 learners. 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 learners 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 learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.
- Provider, local authority and police reports of issues affecting learners in other providers or settings.
- Learners 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.

Prevent and Channel

The Prevent programme is part of the Government's counter-terrorism strategy, CONTEST. Its aim is to prevent people from becoming terrorists or supporting terrorism. It is designed to ensure that individuals who are identified as being at risk of being drawn into terrorism are given appropriate advice and support so that they may turn away from radicalisation.

The 2011 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.

Channel is part of the Prevent strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

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 learners is not compromised and security and welfare of learners and staff are prioritised. We encourage the use of external/visiting agencies or speakers to enrich the experiences of our learners; 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 these with different faiths and beliefs".

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

- 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.
- 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)
- Talk to the speaker about the content of their presentation before the event

- The visiting speaker must arrive in good time to sign in and bring suitable identification.
- Visitors must be supervised at all times and not be left alone with learners, unless a DBS certificate has been presented.
- Bring to an end any presentation where the content proves unsuitable or offensive.
- 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, learners 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 learner and staff welfare.

Teaching Approaches

At Wandsworth Council 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 learners 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 learners build resilience to extremism and give learners a positive sense of identity through the development of critical thinking skills.

We will:

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

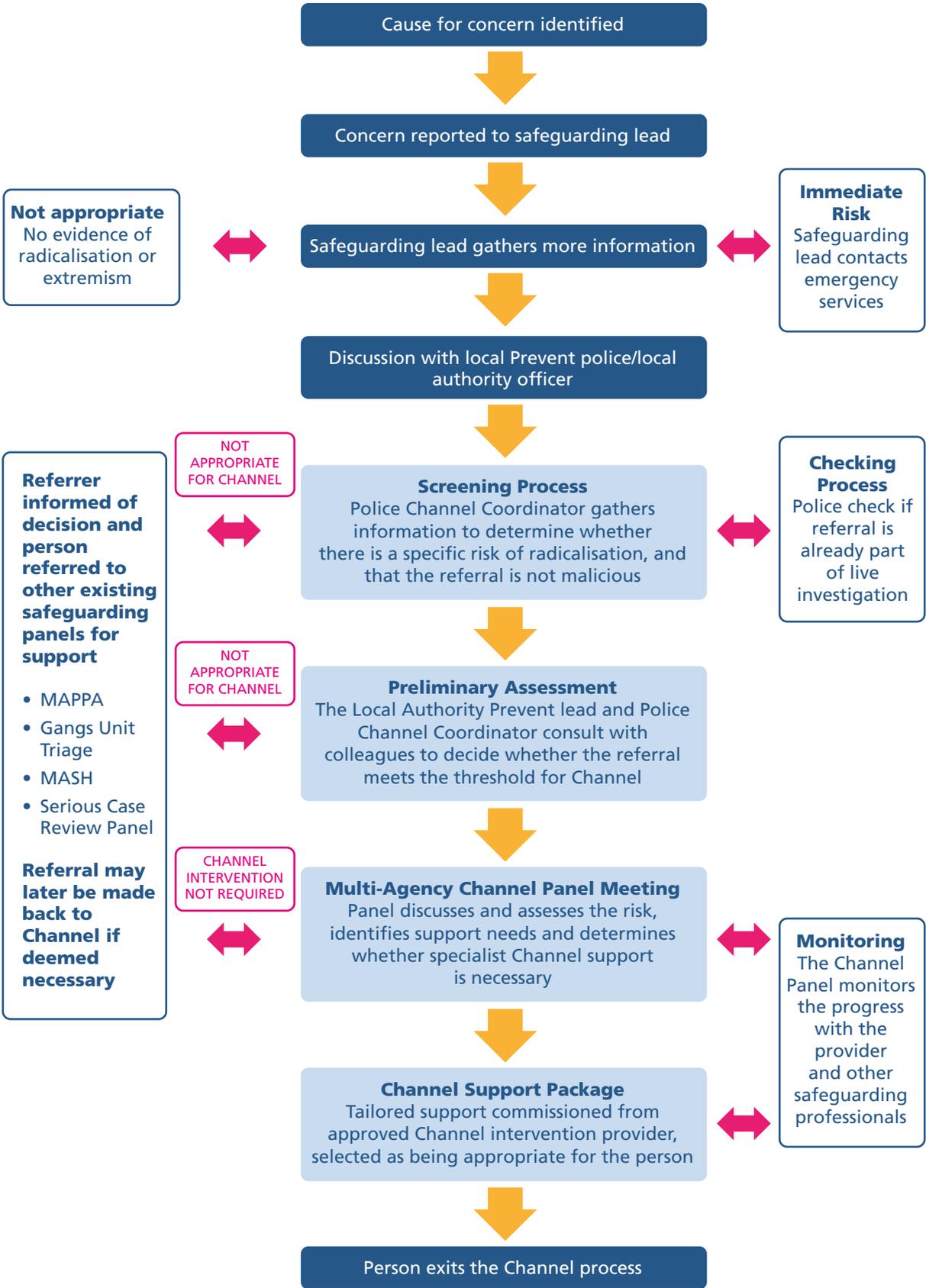
This approach will be embedded within the ethos of our providers so that learners know and understand what safe and acceptable behaviour with regard to extremism and radicalisation.

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 Council Lifelong Learning Channel Referral Process



E-safety

Online safety and security is a prime consideration for all Wandsworth Council Lifelong Learning provision. Wandsworth Council 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 learners and staff stay e-safe and to satisfy our wider duty of care. This Safeguarding Policy should be read in conjunction with the Wandsworth Council Lifelong Learning E-safety and E-responsibility policy and all other relevant Wandsworth Council Lifelong Learning policies.

Safeguarding Policy Update – Remote Delivery

Online classroom delivery

- Staff must wear suitable clothing when delivering classroom sessions. They should also make other members of the household aware of when they will be delivering and the need for appropriate dress/language to be used.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background.
- Learners should also locate themselves in appropriate areas if attending live classes and tutors need to make learners aware prior to the session of this requirement
- The live class should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including any family members in the background
- Only authorised teaching/learning software and/or platforms are to be used
- Only registered WCLL email/accounts are to be used for delivery of programmes
- Only agreed learners to obtain access to the online teaching sessions
- All online programmes to have lesson plans attached to the classroom session if using Google Classroom
- All learners to be informed at the start of the session of the code of conduct
- Any concerns about a learner must be reported to DSL and link to contact numbers and info
- No sharing of any digital media outside the scope of work - no permitted recording/ sharing of the sessions that are live streamed.
- No sharing of personal details information whilst online delivery is taking place

For further guidance please see attached livestreaming guidance from LGfL

Remote 121's

- With any vulnerable adults or children (16-18) learners a video/web cam chat function should not be used – telephone or written communication only unless otherwise agreed with DSL
- Staff must ensure they are using a work related phone number if calling learners - no use of personal phones/ sharing of personal numbers with learners

- No groups to be arranged on social media without DSL approval
- Ensure any material links for support given to learners are from a reputable organisation that comply with appropriate safeguarding guidelines
- Ensure that any phone conversations are recorded e.g One File, IAG Tracker, Destination Forms and give outline of conversation date and time.
- Any concerns about a learner must be reported to DSL as per normal procedure

Staff Code of Behaviour on Safeguarding

Wandsworth Council 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 Council Lifelong Learning. This code should assist in the protection of both individuals and members of staff.

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 exploit².
- 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.³
- Have due regard to the safe and responsible use of online and digital technologies,

Staff must never:

- Engage in rough, physical games including horseplay with any learners
- 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 learners
- 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

² Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 - Section 1

³ Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 – Section 20,21

- 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 learner, or an adult who becomes a learner, beyond that appropriate for a staff/learner relationship
- Share personal mobile, email or social media sites with learners.

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 Learners 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	Learners 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 three 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 Council requires all DBS checks to be renewed after three 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 references⁴.

Staff Training

In line with **Keeping Children Safe in Education: Information for all school and college staff, September 2020**, Wandsworth Council 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 two 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 two years. Annual CPD for all staff is to be delivered by the Designated Safeguarding Lead or their deputy. This is certificated and recorded on the central staff training record.

⁴ More information about how to conduct these checks is in the DfE guidance 'Keeping children safe in education', paragraphs 127 to 132.

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 three months of employment. For learner-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 2020 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 ETF Prevent practioner module.

It is expected that key staff undertake formal refresher training annually and all other staff every three 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.

Wandsworth Council Lifelong Learning is committed to encouraging and enabling all staff to further their professional and personal development and also to support and assist their work life balance between their work and other interests and responsibilities in their life.

Wandsworth Council Lifelong Learning encourage all staff members to:

- take reasonable steps to maintain good health and wellbeing;
- undertake your duties at work when fit to do so;
- follow the reporting absence process when unable to work due to sickness;
- attend appointments and co-operate with the Occupational Health process; and
- attend and contribute to return to work meetings, review meetings and other meetings held to support you.

Line managers should:

- ensure they and their teams are familiar with the support available on The Loop, the process for reporting sickness absence and attend relevant training as necessary;
- support their teams and employees sensitively, objectively and fairly;
- ensure all processes are dealt with in a timely, fair, confidential and consistent manner;
- ensure absence records are recorded, monitored and maintained accurately;
- make sure that flexible working arrangements and work adjustments are encouraged to help to minimise absence or facilitate return to work; and
- maintain reasonable contact with employees during periods of absence.

Human Resources should:

- work with managers to ensure they have the knowledge and information they need to follow this policy, by providing training, information, advice and support;
- ensure the policy and supporting materials are kept up to date and reflective of best practice;

- monitor the use of the policy and outcomes on a corporate and directorate basis.

Occupational Health should:

- offer advice on the impact of illness/condition on an employee's ability to carry out the duties of their post; and
- maximise overall awareness of associated health or occupational health initiatives, through the provision of clear, accessible and high-quality evidence-based information. Extensive advice to support an individual in improving or maintaining a good health profile, including emotional wellbeing, can be found on [The Loop - Health and Wellbeing](#).

Trade Unions should:

- provide advice, guidance and support to union members as appropriate;
- provide representation for union members as appropriate; and
- provide the Head of Human Resources with feedback on relevant issues.

The Independent Staff Support Officer (part of the SSA) is also available to give staff members confidential advice and support.

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 2020](#)

[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; \[www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2\]\(http://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2\)](#)

Review: This policy is reviewed every three years or immediately to reflect any changes to internal policies and procedures and external legislation.

Appendix A

Wandsworth Council Lifelong Learning Protection of Adults and Safeguarding Children Policy and Procedure, 2019-20

Wandsworth Council Lifelong Learning Safeguarding Record of Disclosure and Discussion

Note: Don't forget to explain confidentiality limits!

Staff member's name and role:

Name and address of training provider:

Date of this disclosure:

Name of Learner:

Learners contact details and telephone number:

Age / DOB:

Does the learner have any special needs / factors to consider (e.g. language barriers, children under 18 living in the household, involvement of other services already)?

continued over the page

Disclosure - Please record all information as given in exact words used and record full details given. Please also note any visible injuries in detail (e.g. size, colour, appearance etc) – please use a body map if relevant. It is important that all disclosures, allegations, suspicions and complaints are taken seriously. It is better to act on concerns than to ignore them.

Please ensure you do not ask any leading questions

Date and time of incident – as accurate as can be recalled:

Where incident took place, and details of any other people involved / aware:

Full details of action you have taken (if any) date & time:

Now refer this information to your Designated Safeguarding Lead who will take follow up action. If they are unavailable refer to the contacts below.

Date, time and name of person/ organisation you have referred this to:

*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 Council Lifelong Learning Service**

For Adults – contact the Adult Social Care Access Team on: 020 8871 7707

You will need:

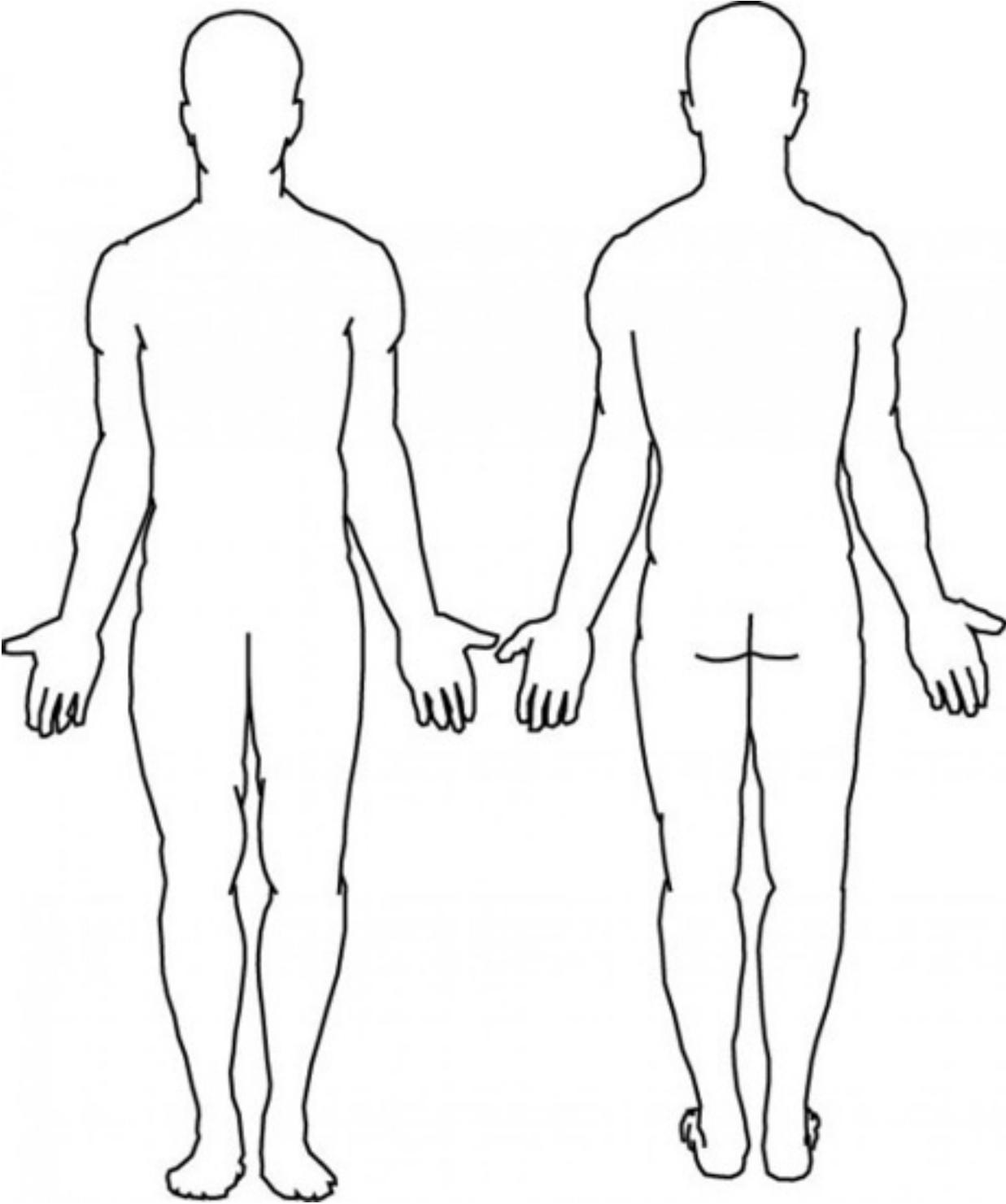
- The name of the person
- Their address
- If known, their date of birth

Communication Mental Health Team on: 020 8767 3411

IPOC (Children) contact: 020 8871 6622 – out of hours 020 8871 6000

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

Body Map



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).

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 Council Lifelong Learning Service's values and ethos?

Proposed External Speaker(s):

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

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 **three** 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:

Proposed email:

Speakers website/YouTube/Social Media URLs:

Speaker's organisation (if applicable):

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? YES NO

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 five 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 YES NO
- previous speech content YES NO
- known affiliations YES NO
- aliases YES NO

Have the open source enquiries been documented and referenced? YES NO

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

- London Borough of Wandsworth YES NO
- Metropolitan Police Service YES NO

Has the reference file been updated with new information? YES NO

3. Response

Does the visiting speaker or the intended presentation breach any condition of the Visiting Speaker Code of Conduct? YES NO

Has the speaker been given permission to present? YES NO

If **yes**, has the speaker received information on the provider's code of conduct and safeguarding principles? YES NO

Has a reference file been updated with justification as to why the visiting speaker was authorised / declined? YES NO

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? YES NO

Did the speaker contribute to the objective of the event? YES NO

Would the Provider invite this speaker again? YES NO

If **no**, why not?

Has the reference file been updated? YES NO

Response to External Speaker Referral Form

Provider Manager response:

Date:

Appendix D

Wandsworth Council 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 Council 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 Council Lifelong Learning has a duty under the Equality Act 2010 as an education provider, employer and service provider not to unlawfully discriminate against any learners, 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 learners 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 Council Lifelong Learning providers.



Joss New

Designated Safeguarding Lead

Mobile number: 07867 151502

joss.new@richmondandwandsworth.gov.uk



Paul Brimecome

Designated Safeguarding Officer

Mobile number: 07989 223060

paul.brimecome@richmondandwandsworth.gov.uk



Santino Fragola

Designated Safeguarding Officer

Mobile number: 07767 256832

santino.fragola@richmondandwandsworth.gov.uk



Phil Michael

Designated Safeguarding Officer

Mobile number: 07824 133379

phil.michael@richmondandwandsworth.gov.uk

Appendix F

Statutory Framework

The key current guidance for education and training providers are:

- 'Keeping Children Safe in Education Sept 2020: for schools and colleges' issued in September 2020
- '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 learners 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 Council 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.