



# Westwood Training and Consultancy

## Safeguarding Learners and Staff policy

### Purpose

As a training centre we will work with learners, staff and our training community to provide a safe environment in which to learn and flourish.

The purpose of this policy is to:

- ensure all adults and young people engaged within provision delivered through WTC including those on work-placements, are adequately supported and protected from harm and the risk of exploitation, including Child Sexual Exploitation (CSE) and radicalisation.
- ensure that all staff, volunteers, sub-contractors, partners and employers carry out their duty of care regarding these individuals.
- ensure that all vetting (DBS) checks are carried out on staff, volunteers, sub-contractor staff and employers in line with legislative requirements.
- ensure procedures are carried out in line with Crossfields Institute.

### Policy Statement

WTC is committed to preventing abuse and exploitation wherever possible and ensuring that robust procedures are in place for dealing with incidents of abuse and exploitation.

### Scope

This policy statement covers all learners, staff, sub-contractors, volunteers, employers, partners and learners of the Centre. It also includes visitors, contractors and suppliers.

### Safeguarding Commitments

This expectation is extended to cover all partnerships and any sub-contracting or Service Level Agreements that are in place. This will be achieved through:

- identifying a 'Designated Safeguarding Lead for the Centre'
- adopting a 'whole organisation' approach to safeguarding, including Prevent Duty, Information Governance, GDPR, online learning and Covid19 Guidance for Safe Learning
- ensuring awareness of Safeguarding and Prevent throughout the Service and within all provision, across all levels of learners, staff, volunteers, subcontractors and employers.
- ensuring all sub-contractors and employers who have an apprentice, (particularly learners or Adults with Learning Difficulties and Disabilities), intern, or trainee working or attending work-placement on their premises, understand and are compliant with WTC Safeguarding Policy and Procedures
- ensuring learners' safety in all aspects, including e-safety, is paramount and that learners feel safe.
- ensuring all staff and volunteers receive relevant Safeguarding and Prevent training appropriate to their role.



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- Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour – and is aimed at protecting vulnerable people.
- ensuring all staff and learners receive DBS checks as appropriate and recruitment procedures support staff identification, qualification and criminal checking.
- ensuring vetting and barring procedures are carried out in line with legislative.
- adopting clear lines of communication with staff, learners, sub-contractors, partners and employers, keeping them up to date on legislation and procedures, including keeping them within the law and supporting them to act in non-extremist ways.
- ensuring effective links are kept with outside agencies and partners to promote Safeguarding and Prevent duty to protect and inform learners and staff.
- ensuring all appropriate risk assessments are carried out effectively, in a timely manner and kept live.
- ensuring all learning, teaching and assessment practice and resources, including online learning and resources, support the concept of the 'safe learner'.
- ensuring a clear and timely reporting procedure.

## Monitoring

As Safeguarding lead, Michelle Wisbey will act as the monitor to evaluate the effectiveness of Safeguarding and Prevent activity. Michelle Wisbey and Elizabeth Barclay will act as the monitor to evaluate the effectiveness of teaching, learning and assessment processes in making learners feel safe and supporting them in keeping within the law and acting in non-extremist ways. Learner, partner, sub-contractor and employer feedback will be obtained through quality assurance tools e.g. surveys, focus groups, learner evaluation.

## Equality, Diversity and Inclusion

This policy will be used to promote fairness in all aspects of practice within WTC's commitment to be fully inclusive. WTC values freedom of speech and the expression of beliefs as fundamental rights underpinning our society's values. Whilst we value free speech, we also believe it is subject to the laws and policies governing equality, human rights, community safety and community cohesion. We recognise that some groups of learners may be more vulnerable to abuse and exploitation (e.g. learners with learning difficulties, mental health issues, young people, children, etc.).

All learners, regardless of disability, ethnicity, age, sex, religion and belief including non-belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, social background or appearance; have the right to equal protection from all types of harm, abuse, exploitation and the risk of radicalisation. More details can be found in the equality and inclusion policy.

## Staff and Volunteers

It is compulsory for every staff member to attend a Safeguarding training course and to renew that training every 3 years. This ensures that all staff are able to recognise the signs and symptoms of possible abuse (appendix 1). Staff are aware of the local authority guidelines for raising concerns to the Designated Safeguarding Leader and the process of making referrals.

Staff will receive regular update training; in addition, they receive regular update information via staff meetings, emails, bulletins and publication updates.



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We ensure that all staff know and understand the procedures for reporting and recording their concerns.

## Designated Safeguarding Lead

Our Designated Safeguarding Lead for learners is: **Liz Barclay**.

Our Designated Safeguarding Lead who oversees this work is **Michelle Wisbey, Director**

Our Designated Lead renew their training regularly and are always available, during preschool opening hours, should staff wish to discuss concerns.

## Keeping Learners safe

We have procedures for recording the details of visitors to the centre.

We take security steps to ensure that we have control over who comes into the centre so that no unauthorised person has unsupervised access to the centre while learners are present.

We take steps to ensure learners are not photographed or filmed on video for any other purpose than to record their development or their participation in events organised by us.

## Safeguarding in Placement

Should students have a safeguarding concern whilst on placement please refer to the placement setting safeguarding procedures. If the student needs support with this then please talk to WTC Safeguarding lead.

## Safer Recruitment

Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.

Candidates are informed of the need to carry out 'enhanced disclosure' checks with the Disclosure and Barring Service before posts can be confirmed.

Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We record information about staff qualifications, and identity checks and vetting processes that have been completed including:

- DBS records disclosure reference number
- the date the disclosure was obtained.
- details of who obtained it.

We inform all staff that they are expected to disclose any convictions, cautions, court orders or reprimands and warnings that may affect their suitability to work with children (whether received before or during their employment with us).



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We abide by the Safeguarding Vulnerable Groups Act (2006) and the Disclosure and Barring Service requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led, to dismissal for reasons of child protection concern.

## **Procedure to follow in response to a disclosure or indicator of abuse**

If a student tells a staff member or volunteer or about risks to their safety or wellbeing, or a member of staff has any concerns about a student, WTC's procedure is to:

- Take any appropriate emergency action (First Aid, Duty Principal, Police etc.)
- Explain to the student the referral you are making and possible next actions
- Speak with a Safeguarding Officer about the concerns
- Document and date the concern.

## **Confidentiality, Information Sharing and GDPR**

WTC is required to ensure that it can demonstrate full compliance with the principles of the General Data Protection Regulation (GDPR). All learners and staff are required to be familiar with Data Protection guidance and are supported through training to ensure confident knowledge. Any data breach or suspected data breach must be referred immediately to Michelle Wisbey. General Data Protection Regulation (GDPR) can be found in appendix 2.

## **Associated Policies and Procedures:**

Equal opportunities and Diversity Policy

Staffing and Employment Policy

Health and safety policy

Learner recruitment policy

Staff recruitment policy

Data Protection Policy

## **Review**

The policy will be reviewed in September 2022

We will review this policy and its associated procedures annually as part of our self-evaluation arrangements and/or in response to customer, or regulatory feedback and any trends that may emerge in the types of queries we may have received.



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## Appendix 1

### Definitions Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons.

The categories of abuse are those adopted by the Department of Health

- physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, could not consent or was pressured into consenting.
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

## Appendix 2



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## General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU).

GDPR sets out the principles for data management and the rights of the individual, while also imposing fines that can be revenue-based. GDPR covers all companies that deal with data of EU citizens, so it is a critical regulation for corporate compliance officers at banks, insurers, and other financial companies. GDPR came into effect across the EU on May 25, 2018. Information governance This is the management of information at an organisation. Information governance balances the use and security of information. Information governance helps with legal compliance, operational transparency, and reducing expenditures associated with legal discovery. An organisation can establish a consistent and logical framework for employees to handle data through their information governance policies and procedures. These policies guide proper behaviour regarding how organisations and their employees handle electronically stored information. More details can be found in our data protection guidance.

## Appendix 3

Radicalisation: This is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or actions. Vulnerability<sup>6</sup> The following are examples of vulnerability:

- Identity crisis: vulnerable people who are exploring issues of identity can feel both distant from their parents, family and cultural and religious heritage. They may be uncomfortable with their place in society around them. This can be exploited by providing a sense of purpose or feelings of belonging <sup>6</sup> The following have also been found to contribute to vulnerable people joining certain groups supporting terrorist-related activity: ideology and politics; provocation and anger (grievance); need for protection; seeking excitement and action; fascination with violence, weapons and uniforms; youth rebellion; seeking family and father substitutes; seeking friends and community; and, seeking status and identity.
- Personal crisis: This may, for example, include significant tensions within the family that produce a sense of isolation of the vulnerable individual from the traditional certainties of family life.
- Personal circumstances: The experience of migration, local tensions or events affecting families in countries of origin may contribute to alienation from UK values and a decision to cause harm to symbols of the community or state.
- Unemployment or under-employment: Individuals may perceive their aspirations for career and lifestyle to be undermined by limited achievements or employment prospects. This can translate to a generalised rejection of civic life and adoption of violence as a symbolic act.
- Criminality: In some cases, a vulnerable individual may have been involved in a group that engages in criminal activity or, on occasion, a group that has links to organised crime and be further drawn to engagement in terrorist-related activity



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