



Adult Learning Within Reach

## WEA SAFEGUARDING POLICY (England)

### Introduction

The WEA Safeguarding Policy operates across the WEA in England and Scotland. There are some differences in the Safeguarding legislative framework between England and Scotland, but the aim of the WEA is to implement a unified approach to safeguarding children, young people and adults at risk across the areas in which we operate. However, to ensure clarity in the use of different terminology and legislation, we provide two policy documents: WEA Safeguarding Policy (England) and WEA Safeguarding Policy (Scotland). The following policy applies to England.

### Policy Summary:

The WEA is committed to:

- Promoting and protecting the safety and wellbeing of children, young people and adults, including staff engaged in the range of its activities.
- Preventing abuse wherever possible and ensuring that robust procedures are in place for dealing with safeguarding concerns, allegations of abuse or disclosures.
- Protecting children, young people and adults from exploitation and grooming by extremists, as defined by the Prevent duty.
- Establishing and maintaining an environment where children, young people and adults feel safe and secure, are able to talk and are listened to.
- Ensuring that clear direction is given to staff, trustees, members volunteers and others about expected behaviour and action when identifying and responding to safeguarding issues.
- Making explicit the responsibilities of everyone in relation to safeguarding children, young people and adults, including those defined as “vulnerable” or “at risk”, in response to current legislation and guidance.
- Promoting safeguarding through recruitment processes and ensuring required checks are completed prior to the appointment of any individual, in line with current legislation and good practice.

### 1. Purpose

The WEA is committed to providing a welcoming environment where everyone is respected and valued and can feel safe and secure. This includes students, staff, members, volunteers and individual visitors who access its facilities and services.

The WEA applies the concept of safeguarding to students and staff in a range of situations regardless of whether they are receiving services that are classed as “regulated” activities or whether they are defined as “vulnerable” or “at risk of abuse or neglect”.

This policy applies to all senior leaders, salaried and hourly paid staff, members, volunteers, students, trustees, partnership organisations and agency or contractor staff (e.g. consultants, researchers or advisors).

## 2. Definitions

### 2.1 Scope of learning provision:

The WEA is an adult (aged 19+) learning provider with a wide scope of provision which includes adults who may be considered “at risk” or “vulnerable”. However, the WEA may also be engaged in activities or project work within community centres, children’s centres or schools which directly or indirectly involve children or young adults. Therefore, this policy encompasses all age groups that are directly or indirectly involved in the WEA’s learning activities.

### 2.2 Child:

A child is anyone under the age of 18.

### 2.3 Adult:

An adult is anyone aged 18 or over.

### 2.4 Abuse (vulnerable or “at risk” adults):

Abuse is defined as “a violation of an individual’s human and civil rights by another person or persons”. It may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of the person subjected to it”. (Department of Health: “No secrets, Section 2; amended by the Care Act 2014).

### 2.5 Child Abuse:

Keeping Children Safe in Education (updated September 2024) defines abuse as “a form of maltreatment”. This may involve “inflicting harm or by failing to act to prevent harm.” “Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.”

Areas of abuse include sexual, physical, emotional abuse, neglect, cyber-bullying, domestic violence, drugs, fabricated or induced illness, faith abuse, forced marriage, gangs and youth violence, private fostering, female genital mutilation (FGM), gender-based violence against women and girls, radicalisation, sexting, teenage relationship abuse, peer on peer abuse, initiation/hazing type violence and rituals, trafficking.

Whilst the legislation and procedures are different when responding to child protection concerns and Adult Safeguarding, most of the principles and procedures for staff are the same. Adult and child safeguarding are the responsibility of all.

### 3. Scope and Responsibilities

#### 3.1 Responsibility of all staff:

All salaried and hourly paid staff, senior leaders, students, members, volunteers and trustees are responsible for creating an environment that promotes well-being and ensures personal safety. They will act promptly in accordance with the safeguarding policy and inform the Designated Safeguarding Officer or the WEA National Safeguarding lead, of any issues of suspected or reported abuse of children, young people or adults.

#### 3.2 Trustees and Senior Leaders:

Trustees and Senior Leaders will receive appropriate training on safeguarding and will know their responsibilities and legislative requirements with respect to the protection of children, young people and vulnerable adults. They will comply with the “Strategy for dealing with safeguarding issues in charities” (6.12.17) to ensure that beneficiaries or others who come into contact with the WEA do not, as a result, come to harm.

[Strategy for dealing with safeguarding issues in charities - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

They will ensure that:

- A culture of vigilance is promoted; students and staff feel safe.
- Safeguarding policies and procedures are regularly reviewed and reflect both the law and best practice.
- There is a public commitment to safeguarding with clear information about the WEA approach and the Safeguarding policy on the WEA website.
- There is a Senior Manager, normally the Director of Curriculum, Quality and Safeguarding who is the overall strategic lead for Safeguarding and Prevent in the WEA.
- There is a designated WEA national lead safeguarding lead manager for England and Scotland.
- There is a Senior Manager, normally the Director for Scotland, who is directly responsible for managing and implementing safeguarding procedures in Scotland.
- There are designated safeguarding officers across all areas of WEA provision. Safeguarding designates are trained to Level 4 with refresher training every two years.
- There is a designated Association Trustee who has a responsibility for safeguarding, champions its importance, and ensures appropriate scrutiny.
- WEA’s Safeguarding policy, procedures and reporting systems are implemented effectively.
- There is robust monitoring of safeguarding practice in subcontracted provision.
- There are procedures in place to handle allegations against staff and volunteers.
- Allegations of abuse against staff and volunteers are handled effectively, including submission of a serious incident report to the Charity commission (see section 7) and a referral to the Disclosure and Barring Scheme (DBS) as appropriate.
- There is a clear approach to implementing the Prevent duty, protecting children, young people and adults from exploitation and grooming by extremists.

- Safe recruitment processes are followed; required checks are completed prior to the appointment of any individual, in line with current legislation and good practice. A single central record is maintained.
- Safe use of electronic and social media is promoted.
- Appropriate information sharing policies are in place.
- Appropriate whistleblowing policies are in place.

### **3.3 WEA National Safeguarding Lead Managers (England and Scotland)**

The Safeguarding Lead Managers have responsibility for:

- the safeguarding policy and framework; annual review and update.
- implementation of the Safeguarding and Prevent Duty training plan and the development of training resources which are current and appropriate.
- facilitating regular meetings of the designated Safeguarding officers.
- facilitating regular meetings with the designated Association Trustee who has a responsibility for safeguarding.
- maintaining the Safeguarding and Prevent central record.
- providing advice to the Safeguarding Designates on safeguarding issues, disclosures or referrals.
- providing support and advice to Association Trustees, Managers and HR staff in dealing with matters that have a safeguarding dimension.
- promoting a culture where all staff and volunteers feel able to raise concerns about safeguarding practice and addressing concerns in a timely manner.
- consulting with the HR team in cases where a safeguarding disclosure involves a member of staff or volunteer and, in association with HR, managing the investigation process.
- in association with HR and the designated Association trustee, managing referrals to the Disclosure and Barring Scheme (England) or Disclosure Scotland/PVG scheme and serious incidents reports to the Charity Commission, as appropriate.
- implementing the Prevent duty, annual risk assessment and action plan.
- providing regular and annual reports to the SMT, the Board of Trustees and appropriate sub-committees.
- contributing to the annual Self-Assessment and Quality Improvement processes.

### **3.4 Designated Safeguarding Officers**

Designated Safeguarding Officers (DSO) are responsible for:

- maintaining a culture of vigilance.
- ensuring that all Safeguarding procedures are followed in their designated area.
- being the first point of contact in that area should any safeguarding issues arise.
- following the procedures set out in the Safeguarding procedure document (SAFE 3) when dealing with an incident of concern or disclosure of abuse.
- maintaining confidential and secure written records.

- in consultation with the National Safeguarding Lead Managers, making referrals to the Local Authority Designate Officer (LADO) Safeguarding Boards, Children's Social Care, or local Prevent officer, as appropriate.
- working with other agencies, as required, within the framework of Local Authority Safeguarding Board Policy and Procedures.
- reporting, as required, to the Safeguarding Designate Leads.
- maintaining the currency of their training, as advised by the Safeguarding Designate Leads.
- monitoring staff safeguarding and prevent training for their region.
- supporting investigations into safeguarding allegations against staff, as appropriate.

The Designated Safeguarding Officers will form a network team, facilitated by the WEA National Safeguarding Leads, to share and update training and practice. Networking events will normally take place remotely.

### **3.5. Line Managers**

Line managers have a responsibility to ensure that all staff members and volunteers receive training relevant to their role, according to the Safeguarding and Prevent training plan. Where appropriate, staff appraisal reviews and line manager supervision meetings should include discussion of safeguarding issues. Line managers who are also recruiting managers are responsible for ensuring that DBS checks for tutors and volunteers, as appropriate, have been completed where necessary before a course starts.

### **3.6. Recruitment Managers**

Hiring Managers at the WEA follow safe recruitment principles and best practice, considering safeguarding at every step of the recruitment process. This means that the WEA will ensure that:

- All adverts that require DBS or barred list checks refer to this fact;
- All job descriptions refer to the responsibility to comply with WEA's Safeguarding procedures;
- All applicants invited to interview are required to provide proof of ID, right to work in the UK and qualifications (where relevant);
- Organisation-wide 'Safer Recruitment' training is rolled out with all interview panels including at least one member of staff who has undergone safer recruitment training;
- A minimum of two references are taken up before a successful candidate can take up their position;
- Where a DBS check (basic or enhanced) or barred list check is required, no successful candidate can start work for the WEA until a satisfactory check is complete. For a role that is not in regulated activity, if the time taken to receive a DBS check is significant, the Director of Quality & Performance and Head of HR

Operations will determine whether the successful candidate can start on restricted duties to ensure that safeguarding risk is minimised.

- WEA maintains clear and regularly reviewed policies for procurement and subcontracting which require rigorous, thorough due diligence processes in the interest of ensuring agencies commissioned to provide services are adhering to appropriate legislation and statutory guidance, such as Keeping Children Safe in Education and Safer Recruitment principles.

#### **4. Training**

- The WEA requires all staff and volunteers to undergo safeguarding training, including online safety training, at least every two years, with regular updates in between training events.
- All new staff and volunteers will receive safeguarding induction training.
- Training will be proportionate to the role using a range of formats which include Canvas online learning, face to face group sessions, staff conferences and activities during tutor development days.
- WEA training resources will be revised regularly to consider topical issues, incidents or changes in legislation.
- National Safeguarding Lead Managers and Safeguarding Designate Officers are required to complete Level 4 external training, updated every two years. Additional external training will be utilised as appropriate.

#### **5. Sexual Harassment**

Procedures involving safeguarding students, staff and volunteers from possible sexual harassment are outlined in a separate policy. The policy includes sexual harassment that may occur beyond the WEA's normal business hours, such as on social media or during other forms of social activity.

[Policies | WEA](#)

#### **6. Online safety**

Policy and procedures regarding online safety are outlined in a separate policy:

[Policies | WEA](#)

Further information is available from:

<https://padlet.com/WEACQT/e-safety-with-the-wea-tj59ofvew3dr>

#### **7. Professional confidentiality and information sharing in relation to safeguarding concerns.**

“The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to

ensure that personal information about living individuals is shared appropriately”. (HM Government: Information sharing. July 2018).

A member of staff who receives a disclosure or has a concern should explain clearly to the person about what to expect next and how information could be shared with others who need to know. It is important to seek their agreement, except when to do so would put the child, adult or others at increased risk of significant harm. A degree of professional judgement is involved. There must be a legitimate purpose for sharing information with the overriding consideration being the individual’s safety and welfare. Information sharing will be based on “The Seven Golden Rules to Sharing Information” (HM Government: Information sharing. May 2024) and will be “necessary, proportionate, relevant, adequate, accurate, timely and secure”.

[DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/7_golden_rules_to_sharing_information.pdf)

There is a statutory or professional duty to share relevant information in circumstances where children need to be safeguarded. The appropriate Safeguarding Designate, in association with the WEA National Safeguarding Lead, will decide whether to refer a case to the relevant Local Authority Adult Board or Children’s Social Care. The WEA applies the same policy in situations where an adult is at risk of abuse or neglect.

## **8. Whistleblowing**

All staff will be made aware of their duty to raise concerns about the attitude or action of colleagues. The Whistleblowing policy provides guidance to all those who work within the organisation who think they need to “blow the whistle” on alleged bad practice. This may involve the disclosure of information by an employee or worker which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace.

## **9. Management of Safeguarding Allegations against Staff/Volunteers**

A Safeguarding allegation against a member of staff or volunteer is defined as any information that indicates that the member of staff/volunteer is behaving in a way that demonstrates unsuitability for working with children, young people or adults in their present position, or in any capacity. In relation to working with the WEA, this includes:

- Behaviour that has harmed or may have harmed an adult or child.
- Possibly committed a criminal offence against or related to an adult or child.
- Behaviour towards an adult or child that indicates that they may pose a risk of harm to other adults or children.
- Use/possession of sexual material relating to children.
- Use of sexually explicit images depicting violence against human beings (including possession of such images)

- Sexual behaviour involving a vulnerable adult or child.
- Inappropriate professional behaviour including initiating or seeking sexual activity with students.

Harm is defined by the DBS in its widest context and may include:

- Sexual harm
- Physical harm
- Financial harm
- Neglect
- Emotional harm
- Psychological harm
- Verbal harm

Safeguarding allegations about a member of staff or volunteer must be reported immediately to the WEA National Safeguarding Manager who will inform the appropriate WEA HR Manager and the Local Authority Designate Officer (LADO). If the allegation is about the National Safeguarding Manager, it must be reported immediately to the Director of Curriculum, Quality and Safeguarding. A Case Manager will be appointed and an investigation into the allegation will be carried out in liaison with HR, following HR procedures. The Trustee Safeguarding Lead will be kept informed of the progress and outcomes of the investigation and a case report provided for the Board of Trustees. A barring referral to the DBS will be submitted by the HR Department, if appropriate; a serious incident report to the Charity Commission will be submitted by the Board of Trustees, if appropriate.

## **10. Evaluation**

Safeguarding practice will be evaluated annually by the WEA National Safeguarding Lead managers. This evaluation will inform judgements made in the Self-Assessment report against the Common Inspection Framework Safeguarding criteria. Quality Improvement actions will be identified and implemented, as appropriate.

## **11. Review**

The WEA National Safeguarding Lead Managers are responsible for maintenance, regular review and updating of this policy.

## **12. Accessibility**

If any aspect of this policy or its related procedures causes an employee difficulty on account of any disability that they may have, or if they need assistance because English is not their first language, they should raise this issue with their designated safeguarding person who will facilitate the appropriate arrangements.

## **13. Links to other policies and procedures**

This policy needs to be read in conjunction with the following policies/procedures:  
WEA policies and procedures: [Policies | WEA](#)



- Prevent policy.
- Sexual harassment policy
- Equality, Diversity and Inclusion
- Student Confidentiality policy
- Information sharing Guidance
- Complaint Handling Procedure
- WEA student code of conduct
- WEA Student online learning agreement
- WEA online safety policy
- WEA Student computer and digital use policy
- Unacceptable student behaviour procedure
- Whistleblowing
- Disciplinary and Grievance
- Data Protection Policy
- Recruitment and Selection/DBS Procedures.
- Volunteer Complaints policy
- DBS guidance for Education Staff

#### **Other relevant policies and procedures**

- Making Barring Referrals to the DBS (<https://www.gov.uk/>)
- Strategy for dealing with Safeguarding issues in Charities. (updated 6<sup>th</sup> December 2017)  
<https://www.gov.uk/.../strategy-for-dealing-with-safeguarding-issues-in-charities>
- Keeping Children Safe in Education (updated September 2024)  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government July 2018).
- Review of sexual abuse in schools and colleges. Ofsted June 2021  
<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>.

<b>Date of this Review</b>	<b>Date of next Review</b>	<b>Policy reviewed and updated by:</b>	<b>Policy owner:</b>	<b>Policy approved by:</b>
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