



ADULT EDUCATION
WOLVERHAMPTON

Safeguarding

Policy and Procedure

CITY OF
WOLVERHAMPTON
COUNCIL



Contents

1. Purpose of the Policy	3
2. Policy Statement.....	3
3. Values and Behaviours	3
4. Scope.....	4
5. Management and Governance	4
6. Safer Recruitment and Selection	6
7. Staff Induction and Training	7
8. Safeguarding - a whole service approach	8
9. Freedom of speech.....	9
10. Prevent.....	10
11. Responding to a Disclosure or Suspicion of Abuse.....	13
12. Confidentiality	14
13. Allegations against Staff	14
14. External speakers and events	14
15. Displaying external publications (posters and leaflets).....	16
16. Review.....	17
Appendix A: Legal Framework	18
Appendix B: Definition of Terms	19
Appendix C: Types of Abuse	20
Appendix D: Safer Recruitment and Selection Practice.....	21
Appendix E: Staff Roles Requiring DBS Checks.....	22
Appendix F: External Speakers and Room Hire	23

1. Purpose of the Policy

This policy states the responsibilities of Adult Education Wolverhampton (AEW) in relation to safeguarding children and adults at risk, in response to current legislation and guidance.

It supports the implementation of our Mission Statement:

“To make a positive difference to the lives of individuals and communities through high quality learning that inspires, challenges and leads to further learning and employment”

2. Policy Statement

AEW is committed to a positive policy of equal opportunity and strives to support students wherever possible. AEW prioritises safeguarding by promoting the welfare of students and a positive culture where students are able to learn and develop in an environment that is safe and welcoming. Each student’s welfare is of paramount importance. AEW recognises its duty to promote and safeguard the welfare of children, young people and adults at risk receiving education and training at AEW.

This policy states how AEW carries out its obligation to protect children, young people and adults at risk from harm. The service will work with relevant external agencies to achieve this and expects all staff, students and visitors to share this commitment. In particular, to fulfil our statutory duty to assist the local authority with child protection issues and adults at risk.

All staff will be directed to read this policy and Part 1 of ‘Keeping children safe in education’ 2018 as part of their induction. The legal framework of this policy is included in appendix A.

3. Values and Behaviours

British values are integral to all involved with AEW activity. British values form the basis of citizenship within AEW community and across modern Britain. AEW promote and exemplify these values to students, staff and visitors and they are at the heart of all activity.

British values are defined as:

- democracy
- the rule of the law
- individual liberty
- mutual respect and tolerance for those with different faiths and beliefs

AEW also promote service values in line to achieving its mission and vision. AEW values are determined by the acronym PRIDE, illustrated below:

P	Professionalism	Maintaining the highest standards of service and conduct at all times
R	Respect	For our students, our communities, the environment and each other
I	Integrity	Doing the right thing; being honest, trustworthy, ethical and fair
D	Diversity	Learning from and valuing the diversity that our students, our staff and our communities bring to our Service
E	Excellence	Striving to achieve consistently highest standards and to exceed the expectations of our students and other stakeholders

The Student Charter is promoted on every classroom wall, in the Student Handbook and reinforced through induction. It confirms AEW expectations of our students and what they can expect in return.

The Staff Code of Conduct clarifies responsibilities expected as an AEW employee.

4. Scope

This policy applies to all those working in, studying and visiting any AEW site. This includes students, staff, Advisory board members, contracted services, employers offering work placements and visitors. A definition of terms can be found in appendix B. Types of abuse can be found in appendix C.

5. Management and Governance

a. The Advisory Board

There is a designated safeguarding Advisory Board Ambassador. They are responsible for:

- Liaising with the Head of Service, Senior Manager (Business Operations and Student Services) and the DSL Officer regarding safeguarding
- Ensuring that the Advisory Board considers safeguarding and Prevent a priority
- Ensuring that an Annual Report is received by the Board
- Offering challenge and expertise to support safeguarding in AEW

b. Senior Nominated Lead

The Senior Manager (Business Operations and Student Services) is the nominated safeguarding lead at senior management level and responsible to ensure standardisation and parity between policy and practice.

c. Designated Lead Safeguarding Officer (DLSO: Student Services Manager)

The DLSO takes responsibility for safeguarding and child protection, including online safety. They provide advice and support to other staff on child welfare, child protection matters and safeguarding, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so. They work with appropriate partners to safeguard young people and adults at risk of harm and have particular responsibility to be available to listen to young people and adults at risk of harm studying at AEW. They maintain accurate records of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral) and make appropriate referrals to relevant agencies of suspected abuse or allegations.

d. Named Safeguarding Officers

The Learning Guide (Support), Business Services Manager and Facilities Officer are named safeguarding officers. Their role is to support the DLSO.

Suzie Lowe	Designated Lead Safeguarding Officer	01902 551545 suzie.lowe@aes.wolverhampton.gov.uk
Siobhan Jenkins	Designated Safeguarding Officer	01902 551655 siobhan.jenkins@aes.wolverhampton.gov.uk
Lee Southall	Designated Safeguarding Officer	01902 558175 lee.southall@aes.wolverhampton.gov.uk
Adrian Beckett	Designated Safeguarding Officer	01902 558163 adrian.beckett@aes.wolverhampton.gov.uk
Designated staff can also be contacted via: safe@aes.wolverhampton.gov.uk		

e. Safeguarding Monitoring Panel

The safeguarding monitoring panel is made up of the safeguarding officers, Curriculum Manager for Quality, Education and Skills, Curriculum Manager for Marketing and Continuing Education, ESOL Subject Lead and Senior Manager (Business Operations and Student Services).

The safeguarding monitoring panel oversees all aspects of safeguarding within the service by:

- i. Meeting a minimum of once per term to review developments and monitor activities
- ii. Developing and implementing an annual quality improvement plan to ensure that there is a whole service approach to safeguarding
- iii. Monitor types and volume of disclosures termly
- iv. Review and update service safeguarding policy and procedures annually

6. Safer Recruitment and Selection

AEW recognises the importance of creating a culture of safer recruitment to deter, reject or identify individuals who may abuse. Practice adopted to prevent the appointment of unsuitable people can be found in appendix D.

a. Regulated activity and DBS checks

Individuals employed to work in regulated activity will be required to have a DBS certificate before they commence in post, if this is not possible a risk assessment must be carried out by the line manager and discussed with the designated lead safeguarding officer. Line Managers (supported by the Administration Officer) will ensure that roles in scope, will begin the DBS checking procedure using the online portal. Appropriate ID will be checked. The DBS number and renewal date will be recorded by the Administration Officer on the single central record (SCR). If using a 'portable' DBS, the documentation must be checked by the DBS team within the HR team in the Council.

Any person whose normal duties include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically designated to have responsibility for such activities will be subjected to vetting and DBS checking.

Staff teaching under 18 year olds will be identified by the Manager for Skills for Work and MIS once the student's programme of study has been agreed. The Manager for Skills for Work and MIS will liaise with the Administration Officer to check whether there is a current valid DBS check in place or begin the DBS checking procedure using the online portal and carry out a risk assessment, if required.

DBS checks for staff in scope will be renewed every 3 years. However, if a member of staff changes roles within AEW, it may be necessary for their check to be renewed.

Relevant staff are DBS checked according to the roles indicated on appendix E.

The responsibility for keeping a single record of DBS will be Business Services Manager.

Appointments into the above roles made through employment agencies are also in scope for the appropriate DBS check if they are performing any of the roles above.

Risk assessments will be carried out by the Business Services Manager for any member of staff or applicant where criminal history has been disclosed. The assessment will take account of:

- Nature, seriousness and relevance
- How long ago it occurred
- Whether it was a one-off or part of a history
- Circumstances of it being committed
- Changes in the individual's personal circumstances
- Country of conviction
- Decriminalisation

b. Single Central Record

The single central record is jointly maintained by Wolverhampton City Council, Human Resources team and AEW for all staff, including agency staff and volunteers.

Employment agencies are responsible for maintaining a SCR for staff employed to work at AEW and will provide written confirmation that all the relevant checks have been carried out.

The University is responsible for carrying out appropriate checks for PGCE students on placement at AEW and will provide written confirmation that all the relevant checks have been carried out.

The SCR confirms that relevant checks have been completed including:

- an identity check;
- a barred list check;
- an enhanced DBS check;
- further checks on people living or working outside the UK
- a check of professional qualifications;
- a check to establish the person's right to work in the United Kingdom;

Sample records from the SCR are checked regularly by the Business Services Manager to ensure correct information is being maintained.

7. Staff Induction and Training

The Designated Safeguarding Lead (DSL) and named safeguarding officers undertake appropriate child safeguarding training and inter-agency working training (provided by Wolverhampton Safeguarding Board) and also Designated Safeguarding Lead training. The training should be updated every two years. The safeguarding officers will undertake Prevent awareness training. In addition to their formal training, their knowledge and skills will be updated at regular intervals, but at least annually to keep up with any developments relevant to their role.

All staff will receive safeguarding training. They will receive updates (for example via email, e-bulletins and staff meetings) as required but at least annually.

It is the line manager's responsibility to follow the service induction procedure and direct the member of staff to the following documents, which should be read:

- the Safeguarding Policy and Procedure
- Part 1 and Annex A - Keeping children safe in education 2018
- Whistleblowing policy and procedure
- Staff Code of Conduct

The Curriculum Manager for Quality, Education & Skills is responsible for monitoring and recording staff have successfully completed their induction into the service within the required timescales.

The Business Services Manager is responsible for monitoring and recording volunteers have successfully completed their induction into the service within the required timescales.

8. Safeguarding - a whole service approach

a. Creating a safe environment

The service will:

- v. Ensure that all staff, including volunteers, are recruited in line with the Corporate policy and safer recruitment practices and guidance
- vi. Ensure that relevant staff have an enhanced DBS if appropriate for their role in AEW
- vii. Develop and implement appropriate risk assessments in relation to relevant criminal convictions
- viii. Regularly review staff roles to identify areas of 'regulated activity' eligible for Disclosure and Barring Service checks
- ix. Ensure all venues are a safe environment for students and staff
- x. Continually review the safety and security across the service, through the Safeguarding Monitoring Panel
- xi. Ensure risk assessments are undertaken at all main sites, and outreach venues including fire and activity
- xii. Take all reasonable measures to ensure that risks of harm are minimised by appropriate risk assessment and management
- xiii. Ensure staff, volunteers, students, contractors and visitors wear ID badges at all times
- xiv. All visitors and contractors will receive information on service safeguarding, health and safety and equality and diversity requirements
- xv. Have written procedures for following up issues of conduct for both staff and students
- xvi. Operate a 'zero tolerance' approach to weapons, drugs, alcohol and bullying, including cyber or electronic bullying, in all forms
- xvii. Be vigilant to extremism, radicalisation, and hate crime
- xviii. React quickly and appropriately to reports or concerns of abuse, following AEW safeguarding procedures
- xix. Promptly follow up on any student attendance concerns, particularly those with vulnerabilities
- xx. Apply the same appropriate standards regardless of gender, sexuality or disability
- xxi. Report any concerns about other staff to their line manager, Safeguarding DLO or Business Services Manager (whichever is most appropriate to the concern)
- xxii. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in any processes
- xxiii. Staff should feel confident to use the whistleblowing policy and procedure if they feel that genuine concerns are not being addressed

b. Positive promotion

Safeguarding, in its broadest sense, will be promoted positively throughout the service in a number of ways, including:

- i. Commitment to safeguarding will be available on the service website
- ii. Policy and procedures will be available on the intranet and website and upon request (refer to section 18 for a list of the policies, procedures and guidance)
- iii. Information provided to students during course induction (in the Student Handbook and 'Be Safe' card)
- iv. Health and wellbeing, anti-bullying, e-safety, British values and safeguarding information will be promoted throughout the academic year in all curriculum areas
- v. Safeguarding is included within the 'student voice' process
- vi. Safeguarding and Equality issues to be included in all staff meetings
- vii. To provide awareness raising posters, messages in AEW publicity, publications and across the Service

c. Support for students

Students will be offered support through a number of mechanisms, which include:

- i. Additional support for students with learning difficulties or disabilities
- ii. Maintaining links to other relevant agencies or services to signpost for relevant support
- iii. Ensuring the needs of the individual are at the heart of any intervention
- iv. Relevant criminal conviction (RCC) Risk Assessments
- v. Receiving information about who they can talk to if they have any concerns
- vi. Being taught how they can keep themselves safe (i.e. online safety, critical incident protocol etc.)
- vii. Ensuring it is clear about who they should talk to if they have a concern (e.g. publicity, Be Safe cards etc.)

9. Freedom of speech

AEW upholds the fundamental importance of freedom of thought and expression, whilst maintaining dignity and respect for all. Freedom of speech is important for student to develop and learn.

However, free speech which seeks to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued and is subject to laws and policies governing human rights, equality, community safety and community cohesion.

AEW will not suppress freedom to express controversial or unpopular views, unless points of view constitute:

- incitement to riot,
- insurrection,
- racial hatred,
- religious hatred,
- sexual harassment or
- other activity that are likely to cause a breach of the peace or public disorder or otherwise to be unlawful

This statement is designed to support the safeguarding and wellbeing of students and staff and to also reduce the risk of adverse publicity for AEW.

This applies to all staff, students and visitors.

AEW will take action, under the either the relevant staff disciplinary procedure of the Student Conduct Policy should there be any breaches.

Encouragement of terrorism and inviting support for terrorist organisations are criminal offences. AEW will not provide a platform for these offences to be committed.

10. Prevent

The Government's Prevent Strategy is a national programme to stop people becoming terrorists or supporting terrorism. AEW recognises its duty to protect children and vulnerable people from being exposed to extreme views, which may lead to radicalisation (Section 26 of the Counter-Terrorism and Security Act 2015). Extreme views may seek to validate political, religious, sexist or racist violence, or to steer them into a rigid and restricted ideology that does not tolerate diversity. This could include messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

a. Definitions

Definitions given by the Government in the *Prevent* Strategy:

- i. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- ii. Extremism is:
 - Vocal or active opposition to fundamental British values
 - We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- i. Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- ii. Seek to provoke others to terrorist acts;
- iii. Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- iv. Foster hatred, which might lead to inter-community violence in the UK.

b. AEW Approach to Prevent

AEW:

- Is clear that exploitation and radicalisation should be viewed as a safeguarding concern and addressed through our safeguarding procedures
- Will work with partners to prevent students becoming victims or causes of harm
- Values freedom of speech as part of its commitment to equality and diversity. It promotes the expansion of beliefs / ideology as fundamental rights underpinning our society's values and to promote learning
- Will work with staff to:
 - i. Ensure staff recruitment and induction materials are effective in safeguarding students.
 - ii. Promote responsible and effective use of ICT to prevent accessing illegal and inappropriate content. Websites and social networking sites are vehicles for extremists to promote their message and encourage engagement.
 - iii. Raise awareness about the threat from violent extremist groups.
 - iv. Develop a clear understanding and recognition of the risks and vulnerabilities of radicalisation.
 - v. Promote the positive contribution we can make to enable resilient communities.
 - vi. Develop confidence to promote and exemplify fundamental British values in the management, the curriculum and through behaviours across the organisation
 - vii. Promote the importance of protecting the well-being and equalities of students or groups who may be vulnerable to being drawn into violent extremist activity.

c. Risk

There are 5 levels of threat of terrorism and currently the threat to the UK from international terrorism is at the fourth level of severe. This means that an attack is highly likely and could occur without warning at any time. Terrorism in the United Kingdom may include exploitation of vulnerable people, to involve them in terrorism or an activity in support of terrorism. Terrorist groups who pose a threat seek to radicalise and recruit people to their cause. The amount of people who are actually prepared to support violent extremism is very small, however it is significantly greater amongst young people who are vulnerable to manipulation and exploitation.

d. Reducing Risk

The Senior Management Team and the DSL assess the level of risk within the Service. The Safeguarding Monitoring Panel is tasked to implement actions to reduce that risk. Areas for consideration include:

- Risk assessing external speakers and the use of our premises by external organisations
- Our curriculum offer
- Provision specifically targeting vulnerable groups
- Safeguarding cases
- Equality and diversity cases
- Any other issues specific to the organisation and our community

e. Interventions

The majority of people do not become involved in extremist activity so interventions must be relevant and proportionate. It is important to be aware that most interventions are likely to be related to mental health, drug/alcohol or relationship issues.

f. Indicators of radicalisation

There is no defined profile of an extremist. Individuals who become involved in extremist activity come from a range of backgrounds and experiences.

g. Indicators of vulnerability

Students may be receptive to radicalisation through various social, personal and environmental factors. Extremists will take advantage of an individual's vulnerabilities to create a divide between them and their families and communities. It is vital that staff are able to recognise those at risk and exhibiting:

- Identity Crisis - the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis - this may include one or more of the following:
 - i. family tensions
 - ii. sense of isolation
 - iii. low self-esteem
 - iv. dissociated from existing friendship group
 - v. becoming involved with a new and different group of friends
 - vi. searching for answers to questions about identity
 - vii. faith and belonging
 - viii. community tensions
 - ix. events affecting the student's country or region of origin
 - x. aspects of Government policy

- xi. feeling of failure, injustice and/or rejection
- Criminal Behaviour - involvement with criminal groups, imprisonment, and poor habilitation/reintegration;
- Mental Health and addiction issues

11. Responding to a Disclosure or Suspicion of Abuse

a. In the event of an emergency

Contact the emergency services by phoning 999.

b. To report a non-urgent crime

Contact emergency services by phoning 101.

c. Safeguarding concern

Any member of staff who has knowledge of or a suspicion that, a person is or has been suffering significant harm must refer their concern on the same day to a designated member of staff and an account made **in writing, preferably using the AEW Safeguarding Concern form** which can be found on the Safeguarding page of the intranet.



Safeguarding Concern Form

All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in the first instance. However, the student should be assured that all matters will be dealt with discreetly.

Questions should be kept to the minimum required for clarity, and leading questions must be avoided. Judgments should not be made. The information should be factual and not include opinions or personal interpretation of the facts (what you see, what you hear and what you are told). It should be detailed and accurate and where possible use the person's own words.

Any safeguarding concerns relating to students attending classes held in the evening that require immediate attention should be raised in the first instance with the manager on safeguarding duty.

Staff with any concern that there may be a risk of radicalisation or involvement in terrorism should treat it the same as any other safeguarding concern.

d. ICT web monitoring alert reports

Alerts generated by the monitoring and filtering system, Smoothwall, will be treated as any other safeguarding concern and followed up accordingly. The DSL is responsible for checking alerts received for students who attempt to access inappropriate material and the Business Services Manager is responsible for following up on alerts triggered by staff.

e. What happens next?

It is the responsibility of the designated officers to check the detail of the concern/allegations and decide the best course of action. The concern raised will be categorised according to risk. If assessed as a low risk, clear advice and guidance will be provided to the referrer to address

through classroom management or other internal options. If assessed as a medium risk, the safeguarding officer will liaise with staff and outside support organisations for the benefit of the individual. High-risk cases will require intervention from the Wolverhampton Multi-Agency Safeguarding Hub (MASH) or police.

12. Confidentiality

A good working relationship between staff and students depends to a large extent on the establishment of trust. This may be described as a “confidential relationship”. However, guarantees of absolute confidentiality should not be given. If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

All safeguarding records and supporting information are stored securely in accordance with the GDPR and Data Protection 2018.

13. Allegations against Staff

If allegations are made against a member of staff by a student, the DLS should be informed immediately and relevant disciplinary procedures may be invoked. The DLS must also advise the Local Authority Designated Officer (LADO). If the allegation concerns one of the Safeguarding Officers, the Senior Manager (Business Operations and Student Services) will be appointed to deal with the allegation.

If a student makes a malicious allegation against a member of staff (or others) found to be unsubstantiated, the Student Conduct policy will be followed.

14. External speakers and events

AEW does not seek to restrict fundamental freedom of speech however, the expression of views needs to be balanced with the need to ensure students, staff and visitors are free from harm. All of our events, activities and initiatives should be safe, without risk to AEW, and within the law.

If an external speaker, their topic of discussion or the purpose for room hire has the potential to go against our conditions for a safe event, we are committed to working together with event organisers and in some cases, external speakers themselves, to make sure that we reach a judgement that is reasonable, informed and within the law.

a. Definitions

An external speaker, guest speaker or visitor is used to describe any individual or organisation who is not a student or staff member of AEW and who has been invited to speak to students, visitors and/or staff.

This includes any individual who is a student or staff member from another institution. It also includes the main contact from any external organisation who is paying to use AEW facilities.

An event is any event, presentation, visit, activity or initiative organised by a student group, individual or staff member that is being held on AEW premises or where AEW is being represented by a stand on other premises e.g. at an exhibition, school event or fair. It includes events where external speakers are streamed live into an event or a pre-recorded film is shown. It also includes activity being held on AEW premises but organised by external organisation.

b. Code of Conduct for External Speakers

The person or group arranging the event is responsible for ensuring that all speakers or visitors are made aware of its policy and the code of conduct expected. Speakers should:

- i. Abide by the law and our values and policies
- ii. Must not advocate or incite hatred, violence or call for the breaking of the law
- iii. Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support terrorism
- iv. Must not spread hatred and intolerance in the community
- v. Must not discriminate 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
- vi. Are not permitted to raise or gather funds for any external organisation or cause without express permission of the Head of Service

c. Procedure

An External Speaker and Room Hire Request Form must be completed by the staff member, individual or group making the request and sent to the Facilities Officer, (a copy to the relevant Programme Manager) at least 14 days before the event. This form is a risk assessment and should be accompanied by a transcript of the intended talk, together with a signed copy of AEW External Speakers and Room Hire Code of Conduct (see appendix F).

The Facilities Officer and the DSL will be responsible to consider the request and one of the following decisions will be made:

- i. To not permit the event with the external speaker to go ahead
- ii. To not permit the external speaker to attend the event (if it is a wider event)
- iii. To fully permit the event with the external speaker to go ahead unrestricted
- iv. To permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk. These may include observation; independent filming; the inclusion of opportunities to debate or challenge the view being held will grant or refuse permission.

The decision will be final.

AEW reserves the right to cancel, prohibit or delay any venue hire booking with external speakers if the policy is not followed, requested information not produced or if health, safety and security criteria cannot be met.

d. Monitoring

Any breach of the Code of Conduct or any concerns raised by any individual should be taken seriously and forwarded to one of the designated Safeguarding Officers.

The External Speaker and Room Hire Request Form will be stored centrally by the Facilities Officer on the Risk Assessment Database and reported to the Safeguarding Monitoring Panel.

e. Further information

UK Government list of proscribed terror organisations:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578385/201612_Proscription.pdf

15. Displaying external publications (posters and leaflets)

All displayed information should be of good quality, respectful and lawful.

Anyone responsible for displaying or circulating material which is indecent or illegal, or which has the purpose or effect of violating another person's dignity or of creating an intimidating, hostile, degrading, humiliating, offensive or threatening environment or making other feel fearful, anxious or vulnerable will be subject to disciplinary action.

AEW reserves the right to destroy any materials displayed/distributed by individuals or organisations without authorisation.

Any requests from other organisations or individuals to display material on our premises should first seek permission from the Marketing team. The DSL is a member of the Marketing team.

a. Material not normally permitted to be displayed/distributed

- i. Party political material e.g. election posters and leaflets
- ii. Material and advertisements whose contents are proscribed, or which are issued by proscribed organisations;
- iii. Any material which attacks or comments on another person or views
- iv. Any material deemed by AEW to be of a sexually explicit or provocative nature
- v. Any material which AEW considers might reasonably cause offence to a member of AEW community or a visitor
- vi. Material which is unlawful
- vii. Material promoting any paid for or commercial product, service, subscription or membership offered by any person or organization.
- viii. Material which purports to discriminate against persons with Protected Characteristics (Equality Act 2010).

16. Review

This policy and any associated procedures will be reviewed on an annual basis and be amended in accordance with legislative changes, changes to locally agreed inter-agency procedures and best practice in education.

This policy should be read in conjunction with other policies, procedures and guidance including:

Student and Visitors	Staff	Staff, Students and Visitors
Visitors Welcome procedure	Safeguarding, Prevent and British Values staff guidance	Health and Safety policy
Complaints, Concerns and Compliments process	Working Alone procedure	Accident and Incident procedure
Admissions policy	Signing in procedure	ICT policy
Student Charter	Recruitment, Selection and Appointment procedure	VLE Terms and Conditions
Student Conduct policy	Grievance procedure	Be Safe cards
Admissions policy and procedure	Whistle Blowing Policy and Procedure	ID Policy and Procedure
Harassment and Bullying	Staff Code of Conduct	
Student Voice initiatives	Risk Assessment guidance	

Appendix A: Legal Framework

The policy is written against the following legal framework by which AEW delivers its services:

- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Disability Discrimination Acts 1995 & 2005
- Counter Terrorism and Security Act 2015
- Counter Terrorism Strategy 2015
- Prevent Duty Guidance for Further Education Institutions 2015
- Mandatory Reporting of Female Genital Mutilation Oct 2015
- Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015
- Children Act 1989, 2004
- Keeping Children Safe in Education 2018
- Working Together to Safeguard Children 2018
- No Secrets - Department of Health 2000
- Sexual Offences Act 2003
- General Data Protection Regulations and Data Protection 2018
- Mental Health Act 1983
- Mental Capacity Act 2005
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Vetting and Barring Scheme/ Independent Safeguarding Authority 2009
- Care Act 2014

This policy has also been informed by West Midlands Regional multi-agency policy, procedures, and practice guidance.

Appendix B: Definition of Terms

Term	Definition
Child	A person aged up to 18
Young person	Between 12 - 20 years old
Looked after Children	A child who has been in the care of the local authority for more than 24 hours until they turn 18 years old
Care Leavers	Previously been in local authority care. The local authority still has a duty to support care leavers until the age of 21, or 25 if in full time education or have a disability.
Students with special educational needs	Up to the age of 25 who may also need additional services, assistance, protection and consideration
Adult at risk	Aged 18 years or over who is or may be in need of, community care services by reason of mental or other disability, age or illness; or who is or may be unable to take care of him or herself or is unable to protect him or herself against significant harm or exploitation
<p>Vulnerability can apply to a wide range of disabilities and situations, for example adults with caring responsibilities, the old and frail, asylum seekers, those under a probation order or individuals who have suffered from addiction issues, abuse or trauma.</p>	

Appendix C: Types of Abuse

Safeguarding arrangements may be needed to protect young people and/or vulnerable adults from:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online bullying and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/ violence against women or girls
- Radicalisation and/or extremist behaviour
- Child sexual exploitation (CSE)
- Peer on peer abuse
- The impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography
- Substance misuse
- Domestic violence
- Female genital mutilation
- Honour-based violence
- Forced marriage
- Human trafficking and modern day slavery

Appendix D: Safer Recruitment and Selection Practice

i.	Define the role	Job description, specification and advert clearly communicate AEW's expectations, values towards young people, adults at risk or who are vulnerable. There are statements about our commitment to safeguarding
ii.	Scrutinise applications	All information is complete. Any gaps in employment history are queried and documented. There is a signed declaration about any relevant criminal records and that all the information is true. At least 2 people are involved on the recruitment and selection panel, 1 of which must be 'Safer Recruitment' trained
iii.	Agree selection criteria	Consistent application of criteria for shortlisting and assessment
iv.	Robust interview	Structure questions. Rigorous checks for inconsistencies or incomplete information. Probe any gaps, vagueness or areas of concern, taking up any discrepancies with the candidate. Safeguarding related questions will be asked. Notes should be retained
v.	Gather references	Must be a current/most recent employer. Never accept open references or testimonials
vi.	Carry out pre-appointment checks	Verify identity (including date of birth), eligibility to work in the UK, DBS and overseas checks (for roles defined in table below), professional qualifications and any other concerns

Appendix E: Staff Roles Requiring DBS Checks

Staff Role	DBS Type
Family Learning teachers	Enhanced DBS (children's workforce)
Education & Skills (who carry out work place observations)	Enhanced DBS (children's workforce)
Teachers of under 18's	Enhanced DBS (children's workforce)
Life Skills teachers (who teach students with learning disabilities)	Enhanced DBS (adults workforce)
Like Minds teachers (who teach students with mental health issues)	Enhanced DBS (adults workforce)
Designated Safeguarding Officers	Enhanced DBS (children and adults workforce)
Learning Guides	Enhanced DBS (children and adults workforce)
Learning Support Workers	Enhanced DBS (adults workforce)

Appendix F: External Speakers and Room Hire

Request to book External Speaker and/or Room Hire

A member of staff will make a request to invite an external speaker or hold an event. This form must be completed and sent to: Facilities Officer, AEW

Information about who is making the request

Staff member organising the event		Team	
Contact Number		Email address	
No. of attendees expected			

Information about the event

Proposed date of event		Proposed location	
Start time		End time	
Purpose/topic of proposed event			
Proposed speakers/presenters			
Is the event likely to attract media interest - if so why?			

Information about speaker(s)/presenter(s)

Full name		Telephone no.	
Occupation		From which organisation	
Speaker's website, other social media links			
Where did you hear about this speaker? Please give details			

Organiser's Declaration

I declare that the information provided here is, to the best of my knowledge, a true and accurate statement of intentions and requirements.

I/we understand and accept that this event request is made under the provisions of AEW's Code on Freedom of Speech, and I/we agree to comply with that Code in the event that permission to hold this event is granted.

Signature(s)

External Speakers Code of Conduct

Adult Education Wolverhampton (AEW) is committed to creating an environment where everyone is treated with dignity and respect and where diversity is valued. All of our events, activities and initiatives should be safe, without risk to AEW, and within the law.

I will be speaking at the _____ (title) event,

held on _____ (date)

I confirm I will observe the code of conduct for external speakers:

1. Abide by the law and AEW values and policies
2. Must not advocate or incite hatred, violence or call for the breaking of the law
3. Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support terrorism
4. Must not spread hatred and intolerance in the community
5. Must not discriminate 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
6. Must not raise or gather funds for any external organisation or cause without express permission of the Head of Service

Name: _____

Signed: _____ Date: _____

AEW staff member: _____

AEW staff member signature: _____