



WLGA & ADEW's Consultation Response Draft Keeping Learners Safe Guidance

07 November 2019



CLILC • WLGA



INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales. The three national park authorities and the three fire and rescue authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The WLGA is pleased to be able to respond to the Welsh Government's consulting views on the revision of the 2015 guidance for local authorities and governing bodies on arrangements for safeguarding children. This response has been informed by the knowledge and expertise of the Association of the Directors of Education in Wales (ADEW). As such this is a joint consultation response on behalf of the WLGA and ADEW and represents the collective views of the 22 local authorities in Wales.
4. The following response is structured around the specific questions set out in the proposal for that includes:
 - An overview of current policies to safeguard those in education
 - Greater clarity on the specific duties placed on schools and colleges, and how they should be adopted by other education settings
 - A safeguarding audit tool to support education settings to review their safeguarding arrangements.

Question 1 - Do you agree that the draft amendments made to the updated KLS guidance are appropriate and effective? If not, what further amendments do you think are necessary?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments:

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Question 2 - Do you agree with the role and responsibilities outlined in the KLS guidance for both the Designated Senior Person (DSP) for child protection and local authority lead officer for safeguarding? If not, what further amendments do you think are necessary?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments:

The WLGA believes that in both cases these are clear, and do not require any further amendment.

Question 3 - Do you think that the safeguarding audit tool provides the right level of support for schools?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments:

It is essential that schools are supported in such an important area, and the WLGA feels that the suggested amendments should achieve that.

Question 4 - On publication of the final KLS guidance following this consultation, a programme of implementation will commence. What implementation activity (training and/or awareness raising for specific audiences, for example) do you consider will be necessary?

School staff and governors, as well as key local authority staff and members need to be aware of these changes. Safeguarding Boards are also an important audience.

Some general regional sessions would be very helpful to give an overview, and then local authorities and partners may be well placed to deliver specific sessions locally, including schools.

The WLGA would be happy to be involved in further discussions on this.

Question 5 - We would like to know your views on the effects that the KLS guidance has on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

It is assumed that Welsh Government will issue all documents bilingually, and arrange for any training/awareness raising that it manages, will also be available bilingually, including any on-line modules.

If that is done, the WLGA believes that opportunities for those who use Welsh are properly created and available.

Question 6 - Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

Please see response to 5 above.

Question 7 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The WLGA feels that these proposed amendments to 'Keeping Learners Safe' strengthens the suite of arrangements and guidance already in place, and underpinned by the All Wales Procedures, and statutory guidance to local authorities, school governing bodies and other partners in relation to safeguarding children and young people.

Current proposals out to consultation on Home Education have to have regard to all aspects of safeguarding, including an understanding of what is involved by those proposing to deliver education in home or other settings.

The WLGA understands from some local authorities that the involvement of an independent person in cases where safeguarding issues short of criminal prosecution is sometimes difficult to achieve in good time owing to a lack or appropriately qualified and experienced people in some areas. The WLGA supports the idea of an independent person being involved in such cases.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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