

Safeguarding Policy and Procedure – including Prevent and Child Protection

Luton Adult Learning

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Version: 1.0

Last updated: August 2024 to be reviewed annually

Review date: August 2025

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Important contact information

[Whistleblowing policy](#)

Adult Safeguarding team –

Email: adultsafeguarding@luton.gov.uk

Phone: 01582 547730/547563

Children's Safeguarding team (MASH) –

MASH@luton.gov.uk

Reporting forms location on the R-Drive:

\\corporate\AdultEducation\AdultEdData\Resources\SAFEGUARDING\REPORT FORMS

Introduction

Luton Adult Learning is committed to safeguarding and promoting the welfare of all.

This policy has been developed in accordance with the requirements of the Counter Terrorism and Security Act and Prevent Duty (2015) and the Education and Training (Welfare of Children) Act 2021.

Safeguarding adults is supported by:

- Adult Safeguarding Vulnerable Groups Act 2006 (SOVA)
- Protection of Vulnerable Adults Act 2012 (POVA).

Safeguarding children and young people is supported by:

- Children Act 1989 & 2004
- Education Act 2002 and 2011
- Children and Young Person's Act 2008
- Information Sharing - advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Female Genital Mutilation (FGM) Act 2003 as amended by the Serious Crime Act 2015.
- Working Together to Safeguard Children (DfE 2018)
- Keeping Children Safe in Education 2024
- What to do if you are worried a child is being abused (DfE, 2015)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020
- The locally agreed interagency procedures published by the pan-Bedfordshire service Safeguarding Bedfordshire.

Safeguarding children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best life chances.

Child Protection is defined as:

- The activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.

Adult safeguarding is defined as:

- Preventing and responding to concerns of abuse, harm or neglect of adults.

Overall Aims

We believe that staff and Governors all have an active part to play in protecting our learners from harm. Their welfare is our paramount concern.

This policy will contribute to safeguarding adults, young people and children and promoting their welfare by:

- Providing an environment and organisational culture in which everyone feels safe, secure, valued and respected and knows how to access help if they are in difficulties, either in person or online.
- Raising the awareness of all staff of the need to safeguard everyone and of the risks and vulnerabilities people face, including virtually, to enable them to recognise and respond to concerns so that all possible cases of abuse, including harmful sexual abuse, cyber abuse, exploitation, radicalisation, child-on-child abuse, and extremism are reported in a timely and accurate fashion.
- Providing information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult, young person or child.
- Promoting and reinforcing shared British values whilst creating space for open debate that supports people's right to speak freely and voice their values and beliefs.
- Empowering learners to create communities that are more resilient to extremism and protect the wellbeing of particular learners or groups who may be vulnerable.
- Raising public awareness so that communities and professionals are active in preventing, identifying and responding to abuse.
- Developing effective working relationships with all other agencies involved in safeguarding.

Definitions of Abuse

Working Together to Safeguard Children 2018 identifies four main categories of abuse:

- **Physical** – deliberate harm caused by:
 - physical assault –punching kicking, slapping, biting
 - rough handling
 - scald and burns
 - physical punishment
 - inappropriate use of restraint
 - isolation/confinement or restricting movement
 - misuse of medication
 - force feeding or withholding food
- **Sexual**
 - The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Emotional** –
 - A pattern of behaviour that impairs a child's emotional development or sense of self-worth.

- **Neglect –**
 - The ongoing failure to meet a child's basic needs

Additional recognised abuse categories are:

- **Modern slavery –**
 - When an individual is exploited by others, for personal or commercial gain
- **Cyber abuse –**
 - Any type of abuse that happens on the internet, through social media, online gaming or mobile phones. Children and young people may be the victims of online grooming, sexual abuse, sexual exploitation or emotional abuse. They may also be exposed to sexting, online misrepresentation and cyberbullying.
- **Radicalisation**
 - Radicalisation means someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities.
- **Honour based violence**
 - Honour-based violence (HBV) is the term used to refer to a collection of practices used predominantly to control the behaviour of women and girls within families or other social groups in order to protect supposed cultural and religious beliefs, values and social norms in the name of 'honour'.
- **Forced marriage**
 - A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.
- **Sexual exploitation**
 - Sexual exploitation includes rape, prostitution, sexual photography, subjection to pornography or witnessing sexual acts and sexual assault or sexual acts to which the person has not consented or was pressured into consenting
- **Criminal exploitation**
 - Criminal exploitation refers to organised crime gangs / groups who operate in urban areas who supply drugs to suburbs, market and coastal towns; often crossing county borders. The gangs use dedicated mobile phone lines, sometimes known as “deal lines”. They use adults (and children) to move drugs and money.
- **Female genital mutilation:**
 - **(FGM)** is a procedure where the female genital are deliberately cut, injured or changes but there’s no medical reason for this to be done. It is also known as female circumcision or cutting. It is usually carried out on young girls between infancy and the age of 15.
- **Child-on-child abuse:**

- This can including bullying, teenage relationship abuse, physical abuse, sexual violence, sexting, up-skirting, hazing. **It is essential that all staff understand the importance of challenging inappropriate behaviours between children** that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Procedures

- The Adult Skills Delivery Manager, Merielle James, will be the designated senior member of the leadership team for Safeguarding.
- The Quality and Sustainability Manager, Amrita Ghosh, will be the designated senior member of the leadership team for Prevent.
- We have a team of safeguarding champions, and two senior members of staff, Amrita Ghosh and Annette Barnby who will act in the Designated Safeguarding Lead’s absence, who have also received multi agency training and DSL level 3 training, who will have been briefed in this role.
- When a staff member has a safeguarding concern, they will follow the process described below.
- All new members of staff, including volunteers and staff from subcontracted organisations will complete safeguarding and WRAP training as part of their induction programme.
- Refresher safeguarding training will be completed annually in line with KCSIE updates, and ETF (or similar) Safeguarding and Prevent training will be completed every two years and the DSL and two deputy DSLs will complete specific DSL level 3 training every two years. This is in addition to regular safeguarding newsletters and training throughout the year.
- All members of staff, including volunteers know how to respond to an adult, young person or child who discloses abuse or a safeguarding concern and the procedure to be followed in appropriately sharing this information.
- All staff are aware that children & young people may not feel ready or know how to tell someone that they are being abused, exploited, neglected and/or they may not recognise their experiences as harmful. If staff have any concerns, they should raise these using the normal safeguarding channels.
- The learner guide and learner induction makes all learners aware of the safeguarding policy and of Luton Adult Learning’s responsibilities in regard to safeguarding, child protection and Prevent.
- Pre-employment checks to determine staff suitability will be undertaken for all staff recruited to work for Luton Adult Learning and appointment will not be confirmed unless satisfactory checks have been completed. These checks will include references, eligibility checks and Barred List and Enhanced Disclosure & Barring Service Checks (formerly Criminal Records Bureau Checks)
- The names, contact details and photographs of the safeguarding champions will be clearly displayed for all to see, so that learners, visitors, staff, & volunteers know how and who to contact should they need to.

Responsibilities & Disclosure Arrangement

- The Service recognises that it is an agent of referral and not of investigation. It is not the Service’s responsibility to investigate abuse.
- Ensuring that all safeguarding concerns are referred to the multiagency safeguarding hub (MASH) team using the appropriate referral form as soon as possible and within 24

hours of a concern being raised. All staff are aware that if someone discloses a safeguarding issue to them, they follow the process described below

- A referral to the multiagency safeguarding hub (MASH) team or the adult safeguarding team, and from there to the Channel programme, will be made should any adults, young people or children be identified as being at risk of radicalisation.
- Ensuring that detailed and accurate written records of concerns are kept even if the Designated Safeguarding Lead decides there is no need to make an immediate referral.
- Ensuring that all such records are kept securely and confidentially in line with General Data Protection Regulations. Paper records are scanned and then shredded. Electronic records are held in a secure area with restricted access and password protection.
- Records are kept on a database so that any themes or repeated concerns can be monitored and tracked.
- Ensuring that, where necessary, an appropriately informed member of the safeguarding team attends case conferences, family support meetings, core groups, or other multi-agency planning meetings, contributes to the Framework for Assessment process and provides a report which has been shared with the parents/carers.
- Keeping up to date with all current legislation and completing all required essential training.

Safeguarding Procedures / Process.

Staff will ensure children and adults are kept safe by following safeguarding procedures:-

- Staff will immediately record any safeguarding concerns on a safeguarding form and complete the body map if any marks are seen. The form will be signed and dated by the staff member concerned. (currently found here:
\\corporate\AdultEducation\AdultEdData\Resources\SAFEGUARDING\REPORT FORMS)
- The form will be emailed to the safeguarding@luton.ac.uk email address. The member of staff will contact a member of the safeguarding team to confirm they have sent the report. This will be done within one hour of the concern being disclosed, or within one hour of the end of a teaching session. A Safeguarding Champion can be contacted in person or by calling 01582 490033. If the session is held in a school the concern will also be reported to the DSL at the school.
- The designated safeguarding lead will discuss the report with the MASH team and submit a report to MASH within 24 hours as necessary.

Confidentiality

- We recognise that all matters relating to safeguarding and child protection are confidential.
- The Designated Safeguarding Lead and the Safeguarding Champions will disclose personal information about a child, young person or adult to other members of staff on a need to know basis only.
- All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, young people and adults.
- All staff are aware that they cannot promise a child, young person or adult to keep secrets which might compromise their safety or well-being or that of another.
- Staff will share the intention to refer a child or young person to the multiagency safeguarding hub with their parents/carers unless to do so could put the child or young person at greater risk of harm, or impede a criminal investigation.

Supporting Children, Young People and Vulnerable Adults

We will support all children, young people and vulnerable adults by:

- Encouraging the development of self-esteem and resilience through the curriculum.
- Promoting a caring safe and positive environment.
- Having a zero tolerance approach to sexual violence and sexual harassment.
- Embedding safeguarding throughout the curriculum at all levels.
- Teaching staff and learners how to stay safe, including online safety.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children, young people and vulnerable adults.
- Notifying the multiagency safeguarding hub (MASH) as soon as there is a significant concern.

Online Safety

We will support all children, young people and adults by:

- Ensuring the safety and wellbeing of children, young people and adults is paramount when adults, young people or children are using the internet, social media or mobile devices
- Providing staff and volunteers with the overarching principles that guide our approach to online safety
- Ensuring that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

The online world provides everyone with many opportunities; however it can also present risks and challenges

- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We have a responsibility to help keep children and young people safe online, whether or not they are using Luton Adult Learning's network and devices
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If it is felt that any learners or staff are at risk, a member of the safeguarding team will report it by email to the Anti-Phishing Working Group at reportphishing@apwg.org

We will support online safety by:

- Through our learner induction, ensuring that all members of our learning community are aware that unlawful or unsafe behaviour is unacceptable.
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others.
- Supporting and encouraging parents and carers to do what they can to keep themselves and their children safe online.
- Reviewing and updating the security of our information systems regularly.
- Ensuring that user names, logins, email accounts and passwords are used effectively.
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate.
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- Providing supervision, support and training for staff and volunteers about online safety.
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.
- Ensuring that Luton Borough Council Safeguarding procedures are followed where an online safety issue occurs which gives rise to any concerns related to child protection.

Supporting Staff

We recognise that staff who have become involved with a child, young person or adult who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by:

- Providing an opportunity to talk through their anxieties with a member of the safeguarding team.
- Providing regular safeguarding training (as mentioned previously in policy).
- Making them aware of the Council EAP program.

Allegations against Staff

- Staff will take care not to place themselves in a vulnerable position with a child, young person or adult. Wherever possible individual work with children, young people and adults will take place in the view of other adults.
- Any allegations made about staff will be reported immediately to the Adult Skills Delivery Manager. If the Adult Skills Delivery Manager is unavailable the allegation will be reported to the Service Manager.
- If an allegation is made about the Adult Skills Delivery Manager the Service Manager will be informed immediately.
- The Adult Skills Delivery Manager/Service Manager will discuss the content of any allegation with the Local Authority Designated Officer (LADO) and will follow Luton Borough Council procedures for managing allegations against staff.

Whistleblowing

We understand that whistleblowing has a key role to play in safeguarding children, young people and adults and as such we will ensure that:

- All staff are aware of their duty to raise concerns about the attitude or actions of colleagues.
- All staff are aware of Luton Borough Council's whistleblowing policy and how to go about raising concerns about the attitude or actions of colleagues.

Prevention

We understand that staff play a significant role in the prevention of harm by providing adults and children with effective lines of communication within a culture of safety and protection. In order to provide this we will:

- Ensure that all staff are active in establishing and maintaining a culture of safety and protection, where learners feel secure and understand that they will be listened to.
- Ensure that everyone knows who the safeguarding team are and that they can approach them if they are in difficulty.
- Ensure curriculums are broad enough to provide learners with opportunities to learn the skills needed to stay safe from harm and to know to whom they should turn for help.
- Ensure that Prevent is embedded throughout curriculums.