

Safeguarding Policy and Procedure – including Prevent and Child Protection

Luton Adult Learning

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Contact: info@lutonacl.ac.uk

Version: 1.0

Last updated: March 2026 to be reviewed annually

Review date: March 2027

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

1. Purpose & Scope

Luton Adult Learning (LAL) is committed to safeguarding and promoting the welfare of **adults, young people and children** in accordance with the latest UK statutory guidance. This policy outlines LAL's approach to creating a safe environment where all learners can thrive.

This policy applies to:

- all staff (permanent, temporary, casual)
- volunteers
- contractors and partner organisations
- all learners aged 16+
- visitors to Luton Adult Learning premises

Safeguarding in adult learning includes protecting learners from **abuse, neglect and exploitation**, promoting wellbeing, and preventing harm including online and digital harms.

2. Legislative & Statutory Framework

This policy complies with the following current legislation and statutory guidance:

Children & Young People

- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education (KCSIE) 2025
- Children Act 1989 & 2004
- Education Act 2002 & 2011
- Apprenticeships, Skills, Children and Learning Act 2009
- Children and Young Persons Act 2008
- Information sharing advice for safeguarding practitioners (DfE) 2024
- Female Genital Mutilation Act 2003 as amended by the Serious Crime Act 2015
- 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
- Domestic Abuse Act 2021
- Locally agreed inter-agency procedures published by the pan-Bedfordshire service Safeguarding Bedfordshire

Adults

- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Domestic Abuse Act 2021
- Protection of Freedoms Act 2012

Prevent & Counter-Extremism

- Counter Terrorism and Security Act 2015 and Prevent Duty Guidelines 2023
- Channel Panel Duty Guidance

Information Governance

- Data Protection Act 2018 & UK GDPR

Online Safety

- KCSIE 2025 online risk framework

3. Definition of Safeguarding

Safeguarding refers to:

- protecting individuals from **abuse, neglect and exploitation**
- preventing impairment of health or development
- ensuring safe and effective care
- promoting welfare and resilience
- preventing individuals from being drawn into extremist or terrorist activity

4. Roles & Responsibilities

4.1 Designated Safeguarding Lead (DSL)

Adult Skills Delivery Manager – Merielle James

Responsible for:

- managing referrals to MASH, Adult Safeguarding, Prevent/Channel
- maintaining safeguarding records
- oversight of training and practice quality
- multi-agency liaison

4.2 Deputy DSLs

- **Amrita Ghosh (Quality & Sustainability Manager)**
- **Annette Barnby (Curriculum Team Manager)**
Trained to DSL Level 3.

Responsible for:

- Covering the DSL role when the DSL is unavailable.

4.3 Safeguarding Champions

Veronica Prestedge, Sharon Gillas, Christiane Astridge, Samantha Root, Tufayl Ali.

Responsible for:

- Referring safeguarding concerns to Adult Safeguarding and/or the MASH team. Prevent/Chanel.

4.4 All Staff & Volunteers

Must:

- complete annual safeguarding training (in line with KCSIE 2025 expectations)
- complete Prevent/WRAP training every 2 years
- report concerns immediately
- maintain professional boundaries

5. Recognising Abuse, Neglect & Exploitation (Children & Adults)

LAL recognises all forms of harm including:

Main categories

- **physical** – deliberate harm caused by:
 - physical assault – punching, kicking, slapping, biting, scratching
 - rough handling
 - scalds and burns
 - physical punishment
 - inappropriate use of restraint

- isolation/confinement or restricting movement
- misuse of medication
- force feeding or withholding food
- **emotional** – a pattern of behaviour such as insults, gaslighting, threats, constant criticism used to:
 - impair emotional development
 - damage the sense of self-worth
 - control behaviour
 - isolate
 - frighten
- **sexual** – the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- **neglect** – the ongoing failure to meet basic needs

Additional recognised abuse categories:

- **modern slavery** – when an individual is exploited by others for personal or commercial gain.
- **radicalisation** – when someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities
- **honour based violence** – a collection of practices 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 marriages** – 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 social pressure or abuse.
- **sexual & criminal exploitation** – both sexual exploitation and criminal exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive someone into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Some specific forms of criminal exploitation can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others
- **female genital mutilation** – this is a procedure where the female genitals are deliberately cut or injured but there is 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 include bullying, teenage relationships abuse, physical abuse, sexual violence, sexting, up-skirting, hazing and online abuse including abusive, harassing and misogynistic/misandrist messages, non-consensual sharing of indecent

images and the sharing of abusive images and pornography to those who do not want to receive such content.

- **domestic abuse** - physical, psychological, or sexual abuse of a member of one's family or household, especially a spouse or partner.
- **financial exploitation** - the illegal or unauthorized use of a person's money, property, or assets through deception, coercion, or manipulation. It involves taking advantage of someone's vulnerability, often targeting elderly or disabled people or children, to steal savings, accumulate debt, or use their accounts for money laundering.
- **organisational abuse** - the mistreatment or neglect of adults at risk, arising from poor care practices, rigid routines, or malicious policies within a service setting, such as supported living, a care home or hospital.
- **discriminatory abuse** - the unfair or unequal treatment of an individual based on age, disability, gender reassignment, race, religion, sex, or sexual orientation (protected characteristics). It includes harassment, slurs, and exclusion that violate a person's dignity.

Digital & Online Harms (KCSIE 2025):

- **cyber abuse** - the use of digital technology - social media, messaging, gaming, or mobile phones - to deliberately harass, threaten, humiliate, or intimidate someone.
- **grooming** - the process by which a perpetrator builds an emotional connection, trust, and rapport with a child or vulnerable person, and often their family, to lower inhibitions for the purpose of sexual abuse.
- **harmful/extremist online content** - user-generated material that promotes terrorism, violence, hate speech, or severe harm to individuals or society, often designed to radicalize viewers. This content spans illegal material (terrorism, sexual abuse) to harmful, legal narratives (misinformation, extremist ideologies). Key types of harmful content are:
 - **extremist Ideologies:** Narratives that promote hateful ideologies, such as white supremacy, Islamist extremism, or misogynistic worldviews (e.g., incel culture).
 - **terrorist Material:** Content depicting violence, encouraging terror acts, or portraying terrorist acts positively to radicalize and recruit.
 - **hate Speech & Harassment:** Content that promotes violence or hostility against individuals or groups based on race, religion, or protected characteristics.
 - **child Sexual Abuse Material:** Illegal, harmful content that may be produced or shared, often reaching children online.
- **misinformation, disinformation & conspiracy theories** – content deliberately designed to cause distrust in authorities, polarize society, or incite violence:
 - **misinformation:** Incorrect information shared without bad intent (e.g., spreading a false rumour, sharing inaccurate statistics by mistake).
 - **disinformation:** Deliberately deceptive information, fabricated content, or manipulated media designed to mislead, manipulate public opinion, or cause harm.

- **conspiracy theories:** Attempts to explain events as top-secret plots by powerful groups, often ignoring evidence, and can cause significant harm
 - **AI-generated imagery** – deepfakes (videos, pictures or audio clips made with artificial intelligence to look real to deliberately mislead people) & fabricated material
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6. Prevent Duty

Staff will follow the council's **Notice - Check – Share** guidance which can be found on the intranet [here](#)

Notice

Are you worried a person is at risk of extremist behaviour or radicalisation?

- observe concern, listen to disclosure
- record concern on the safeguarding recording form
- talk with designated safeguarding lead (DSL)

If there is an immediate risk staff will:

- report to the police through 999
- follow the organisation's safeguarding procedures

Check

- Speak with the person to get a better understanding of what they are saying.
- Are there any reasons for the change in behaviour?
- If appropriate check with parent unless it could put the child / young person at further risk of harm.
- Talk with DSL or safeguarding champion
- Contact the [Bedfordshire Prevent Police](#)

Share

If there are still concerns the DSL or safeguarding champion will make a referral:

- referrals will be made using the Prevent national referral form [here](#)

- if there are other safeguarding concerns for the children/young people referrals will be made via MASH: [safeguarding concerns for children](#) or for adults via the [Adults Safeguarding team](#)

LAL will:

- identify individuals vulnerable to radicalisation or extremist narratives
- recognise online extremist content, including AI-generated propaganda and disinformation
- refer through *Prevent/Channel* where appropriate
- train all staff to recognise indicators
- embed critical thinking and British Values into the curriculum

7. Reporting and Referral Pathways

7.1 Internal Reporting

Staff **must report within one hour** of receiving a concern.

Steps:

1. Complete the safeguarding form and body map (if relevant)
2. Email to: safeguarding@luton.ac.uk
3. Notify a Safeguarding Champion or DSL in-person, by Teams or phone: **01582 490033**
4. For concerns in a school setting: also inform the school's DSL

7.2 External Referrals

Where required, the DSL/Deputy DSL will refer to:

- **MASH (Children):** MASH@luton.gov.uk
- **Adult Safeguarding:** adultsafeguarding@luton.gov.uk
- **Channel/Prevent:** via Prevent referral form to preventreferrals@beds.police.uk

8. Safe Working Practices & Professional Conduct

Staff will:

- avoid situations where they are alone with learners
 - use professional language and behaviour
 - avoid physical contact unless necessary for safety
 - follow digital communication guidelines
 - avoid personal social media contact with learners
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9. Online Safety

LAL adopts the **KCSIE 2025 four-category model** (content, contact, conduct, commerce) with mandatory additions of:

- **misinformation, disinformation, conspiracy theories**
- **AI-generated harms** including manipulated sexual imagery

LAL will:

- teach safe online behaviour at induction
 - review IT filtering & monitoring regularly
 - apply DfE "Plan technology for your school" and Generative AI risk guidance (referenced in KCSIE 2025)
 - support parents/carers of young learners
 - ensure images are used only with written consent
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11. Safer Recruitment (Updated to KCSIE 2025)

LAL will:

- carry out enhanced DBS + Barred List checks
 - conduct online pre-appointment checks (KCSIE 2025 update) [learning.n...pcc.org.uk]
 - ensure identity, employment history and reference verification
 - follow updated terminology changes in safer recruitment guidance (e.g., "Autism" nomenclature) [wrigleys.co.uk]
 - ensure inductions include safeguarding & Prevent
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12. Managing Allegations Against Staff

Allegations will be reported immediately to the Adult Skills Delivery Manager or Service Manager. LAL will follow:

- Luton Borough Council LADO procedures
 - KCSIE 2025 processes for “harm threshold” and “low-level concerns”
[\[learning.n...pcc.org.uk\]](#)
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13. Child-on-Child Abuse

LAL has a zero-tolerance approach to:

- sexual harassment
- harmful sexual behaviour
- bullying
- sharing of nudes/semi-nudes
- digitally created or manipulated indecent images (2025 update)

KCSIE 2025 reinforces the need for robust responses and ongoing support plans.
[\[assets.pub...ice.gov.uk\]](#)

14. Information Sharing & Record Keeping

LAL follows:

- **UK GDPR**
- **DfE Data Protection Guidance 2024b** (recommended by KCSIE 2025)
[\[cdn.educat...esuk.co.uk\]](#)
- **Working Together 2026** expectations for data-driven safeguarding
[\[safeguardi...dren.co.uk\]](#)

Records:

- kept securely with restricted access
- stored digitally with audit trails
- shared only on “need to know” basis

- retained according to statutory schedules
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15. Whistleblowing

All staff must report unsafe practices or concerns about colleagues without fear of detriment. LBC Whistleblowing Policy applies.

16. Staff Training Requirements

- Annual safeguarding refresher (aligned with KCSIE 2025) [\[gov.uk\]](https://www.gov.uk)
 - WRAP/Prevent every 2 years
 - DSL training every 2 years
 - Ongoing briefings throughout the year
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17. Quality Assurance & Monitoring

- Annual policy review
 - Safeguarding audits
 - Deep dives aligned with Ofsted Education Inspection Framework
 - Reporting to Senior Leadership & Luton Borough Council
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18. Key Contacts

- **Safeguarding Email:** safeguarding@luton.ac.uk
 - **Adult Safeguarding:** adultsafeguarding@luton.gov.uk
 - **MASH (Children):** MASH@luton.gov.uk
 - **ACL Safeguarding Phone:** 01582 490033
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